



## Application for Licence

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

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<b>Licence Number</b>	L8572/2011/2
<b>Applicant</b>	Western Resource Recovery Pty Ltd
<b>ACN</b>	099 144 180
<b>File number</b>	2012/002663-1
<b>Premises</b>	Western Resource Recovery Hampton Location 221, Portion of Reserve 42000 Celebration Road, BOULDER WA 6429
<b>Date of report</b>	20 June 2024
<b>Decision</b>	Licence granted

**GRACE HEYDON**

**A/Manager Waste Industries – Regulatory Services**

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

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## 1. Decision summary

Licence L8572/2011/2 is held by Western Resource Recovery Pty Ltd (the applicant). This decision report documents the renewal of the Licence and 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 L8572/2011/2 has been renewed.

## 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 7 March 2024, the applicant submitted an application to renew licence L8572/2011/2 which is due to expire on 13 July 2024. In addition, the applicant requested the following amendment:

- Addition of two waste codes (F120 and K210) in the new licence.

The Western Resource Recovery (WRR) facility (the premises) is located on Hampton Location 221 Reserve 42000 in Boulder, Western Australia. The site is within an area zoned “rural” in the City of Kalgoorlie Boulder’s Town Planning Scheme No 1.

The premises relates to the categories and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) defined on the licence. The infrastructure and equipment relating to the premises category and any associated activities are outlined on the licence and are in line with *Guideline: Risk Assessments* (DWER 2020).

No changes to existing, approved prescribed premises categories, throughput, infrastructure, wastes, emissions or discharge points are being proposed as part of this application.

In renewing the licence, the Delegated Officer has also:

- Updated the format and appearance of the licence; and
- Consolidated, revised or removed redundant conditions and revised condition numbers for numerical consistency.

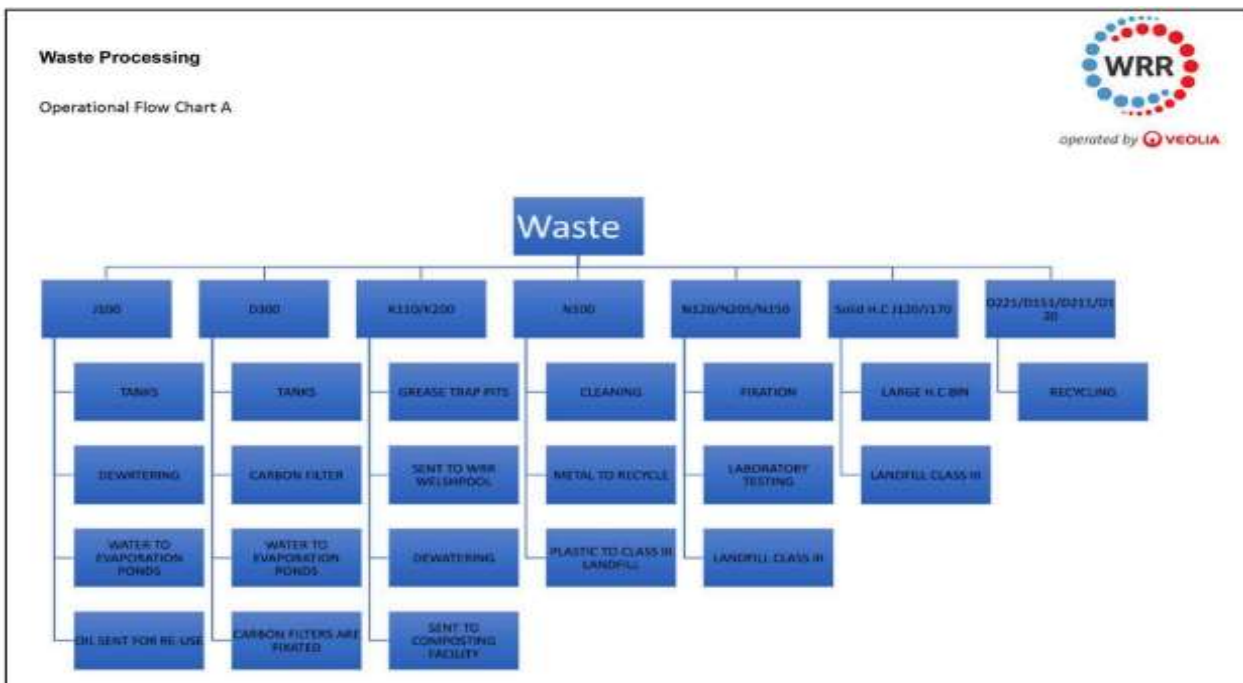
### 2.3 Premises operations

The following information in relation to the stabilisation and solidification process for accepted wastes which occurs at the premises prior to wastes being transported off site for disposal has been summarised as follows:

- Before accepting a load of waste the load is checked to ensure that it matches the waste type recorded on the control waste tracking form (CWTF), and is consistent with the waste facility’s licence;
- Accepted loads of liquid waste are placed into a 50,000 litre concrete pits. If the waste is received contained in drums or IBC’s, a fork hoist is used to move the container to the pit area for transfer into the pit. If the waste is a bulk consignment, vacuum trucks are used to empty their barrels directly into the process pits.
- A composite sample of the waste is taken to the laboratory for determining the correct amounts of reagent to aid in the solidification of metals and reduction of organic material.

- The reagents are added to the liquid in the pit and mixed with a backhoe for a minimum of half an hour.
- The precipitated material is allowed to settle and separate from the liquid fraction over a period of > 6 hours.
- The liquid fraction is pumped from the top of the pit and held in settling tanks.
- The remaining sludge/solids in the pits are blended with lime and sand with a backhoe for up to 6 hours until the consistency of the waste is spadable.
- Once the waste is spadable it is removed from the pits using the backhoe & front-end-loader. It is then left to cure for approximately seven days.
- Stockpiles are turned over using a loader daily for up to 90 days to aid the aeration and drying process.
- Sampling is then undertaken in accordance with the sampling procedure in the *Landfill Waste Classification and Waste Definitions 1996 (as amended 2019) (LWCWD)*.
- Samples collected are sent to a NATA accredited laboratory for analysis. Samples are analysed for leachates using Australian Standard Leaching Procedure (ASLP) test procedure.
- The results from the soil analysis are evaluated against limits provided in the LWCWD.
- The results are forwarded to relevant landfill facilities. Once the landfill confirms the waste can be accepted to their facility the waste will then be transported for disposal.

The following operational flow charts provide an overview of processes waste types accepted to the premises are subject to, as determined by the controlled waste tracking code assigned to the waste type.



**Figure 1: Solid and liquid waste processing flow chart**

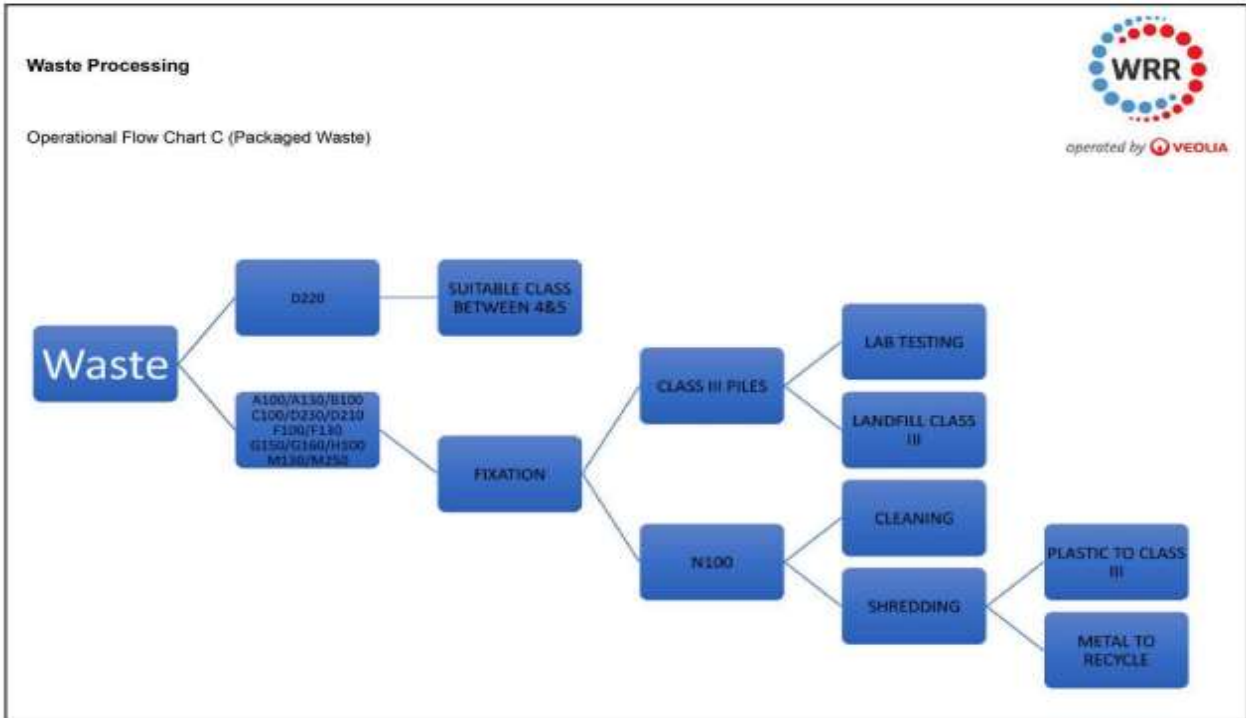


Figure 2: Liquid waste processing flow chart

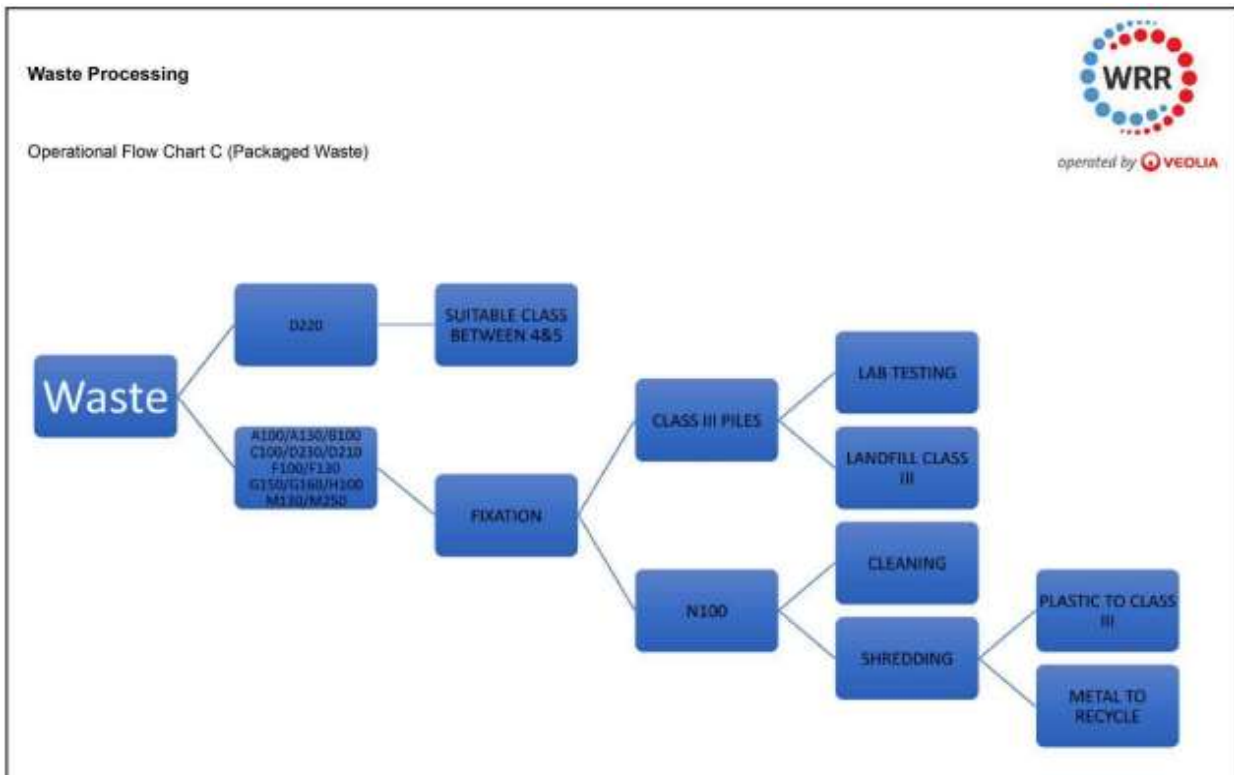


Figure 3: Packaged waste processing flow chart

**Key Findings:** The Delegated Officer has reviewed the information regarding stabilisation and solidification process and has found:

1. DWER does not consider the mixing of liquid waste (i.e. sludges) with a medium (i.e. lime and / or sand) to be 'fixation' but the absorption of liquid waste to allow it to be landfilled. It is unclear how this process meets the waste minimisation objectives of the EP Act given that waste will be diluted to achieve landfill acceptance criteria.
2. There are currently no conditions on the previous Licence for the premises requiring the applicant to test or ensure wastes are tested prior to / on arrival to the premises to provide assurance that what is being accepted meets the waste types authorised to be accepted to the premises. There are also currently no conditions on the previous Licence requiring the applicant to test wastes post treatment for contaminant concentrations and how this will impact where wastes can be disposed of to.
3. Wastes will require verification testing upon arrival to confirm the accepted waste stream is suitable for the proposed treatment and / or solidification.
4. As disposal of waste post treatment will be off-site at a downstream licensed landfill it is imperative to determine the relevant concentration and leachate acceptance criteria for contaminants of concerns as required by the *Landfill Waste Classification and Waste Definitions 1996* (as amended 2019) to ensure that waste sent to the correct landfill.
5. The applicant has indicated that testing of wastes on acceptance to the premises and post treatment is already occurring as a part of site operations.

## 2.4 Compliance inspection

In the months preceding the premises Licence expiry, DWER has received numerous complaints in relation to odour in Boulder, with complaints generally centralised around the premises and the neighbouring South Boulder Wastewater Treatment Plant premises. The odour has been described by complainants as resembling sewage and as having a chemical component.

In response to recent complaints, DWER officers attended the premises on 16 May 2024 and observed that the grease trap waste storage concrete tanks had no covers to contain the waste or to exclude rainwater. DWER officers considered that the open storage of grease trap waste could be contributing to odour concerns in the area.

Representatives for the applicant at the time of the inspection confirmed the following:

- Ambient air quality monitoring is undertaken daily to detect emissions of odour in accordance with current Licence condition requirements; and
- There would be benefit in enclosing the grease trap waste storage concrete tanks to prevent any potential contribution to odour emissions in the Boulder area, and prevent egress for potential pests using the grease trap waste as a food source.

**Key Findings:** The Delegated Officer will consider outcomes of the May 2024 inspection when undertaking a risk assessment for the premises relating to potential ongoing emissions of odour arising from operations.

### 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	Acceptance, handling, consolidation, treatment, and storage of liquid and solid waste, crushing of drums	Air / windborne pathway	Onsite speed limited to 10 km/hr and wetting down of roads when required.
Noise	Acceptance, handling, consolidation, treatment, and storage of liquid and solid wastes Crushing of drums	Air / windborne pathway	Compliance with the Environmental Protection (Noise) Regulations  Operating hours (7am to 3:30pm, Mon – Friday);
Odour	Acceptance, handling, consolidation, treatment, and storage of liquid and solid waste,	Air / windborne pathway	Adequate distance from sensitive receptors with nearest residential property approximately 2km south of the premise boundary.  To overcome odour problems the evaporation ponds are dosed with peroxide and salt on an as-needed basis.  Daily in house ambient boundary monitoring for Ammonia (NH <sub>3</sub> ), Sulphur dioxide (SO <sub>2</sub> ), Hydrogen Sulphide (H <sub>2</sub> S), Carbon monoxide (CO) and Nitrogen dioxide (NO <sub>2</sub> ) carried out as controls in place to detect and manage any odour issue arising in relation to the operations on site.
Containment loss or spills to ground	Acceptance, handling, consolidation, treatment, and	Seepage and run-off to soil and groundwater	Waste oil stored in enclosed tanks with appropriate bunding and available spill kits.  Stored on hardstand constructed of concrete

Emission	Sources	Potential pathways	Proposed controls
	storage of liquid and solid wastes		<p>with bunds.</p> <p>Containment ponds are lined and meets permeability equal or less than <math>1 \times 10^{-9}</math>.</p> <p>Processing conducted on a low permeability concrete pit.</p> <p>Spillages will be cleaned up immediately using onsite spill kits and disposed of at an appropriate facility.</p> <p>All staff handling waste material to be appropriately trained.</p>
Fugitive emissions to air of waste treatment by products	Acceptance, handling, consolidation, treatment, and storage of liquid and solid wastes	Air / windborne pathway	<p>Chemical safety is enforced and followed.</p> <p>Treatment processes developed, trialed, and supervised by a chemist or trained operator.</p> <p>Temperature and pH are monitored during treatment reactions to prevent air emissions.</p> <p>Stabilisation treatments will occur in enclosed containers to prevent air emissions.</p> <p>Appropriate training for all staff handling waste materials.</p> <p>Air monitoring when pesticides and herbicides are treated on site.</p>
Fire/smoke	Fire/smoke in the event of a fire incident	Air / windborne pathway	<p>Fire hydrants, fire hose-reels, fire extinguishers and fire blankets available onsite.</p> <p>Staff inducted on site emergency plan, fires safety and first aid.</p> <p>Working instructions are followed for assessment, receipt and handling of chemicals. At least two checks are made on assessment of wastes received.</p> <p>No flammables to be stored in any of the warehouse buildings or processing building and in a dangerous goods rated self-bunded container prior to commencement of operations.</p> <p>All storage shelving is made from non-flammable materials and capable of holding intended load capacity weights.</p>
Fire wash and contaminated stormwater	Release of fire water in the event of fire extinguishing	Discharge to land and infiltration to groundwater	<p>Firefighting wash water and other waste resulting from firefighting activities will be captured and contained on the premises.</p> <p>All excess stormwater run-off from hardstand areas are contained within the site through a series of blind sumps. Excess stormwater is pumped out of the blind sumps as required and managed on-site as part of the treatment</p>



Emission	Sources	Potential pathways	Proposed controls
			process.
Vermin / pets	Acceptance, handling, consolidation, treatment, and storage of liquid and solid wastes	Air/windborne pathway or transmission via fauna	Use of traps and/or baits to deter and/or control vermin, as well as engaging professional pest control subcontractors. Frequent removal of solid and treated waste from the premises.
Disposal - High contaminants- post treatment	Contaminant present in remediated soil	Direct Discharge-contamination of disposal area and groundwater	The treated waste will be sampled and tested following the LWCWD methodology to determine relevant landfill for disposal. Samples are analysed for chemical contents at a NATA accredited laboratory. Leachate analysis are also carried out.

### 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.

Table 2 and **Error! Reference source not found.** 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	The closest residential receptor to the premises is the town-site of South Boulder, located approximately 1.4 kilometres to the north.
Boulder Township	Located approximately 2 kilometres to the north.
BP Kalgoorlie truck stop	Located approximately 300 metres to the north-west of the premises.
Environmental receptors	Distance from prescribed activity
Hannans lake	The nearest major water natural water body is Hannan’s Lake, which is a normally-dry ephemeral-lake located immediately to the east of the premises.
Public Drinking Water Supply Area	The premises is not located within a Public Drinking Water Supply Area (PDWSA). Hannan’s Lake is not a scheduled PDWSA. Hypersaline groundwater. No beneficial uses of groundwater in the site vicinity.
Groundwater	Depth to groundwater encountered at approximately 2 – 3mbgl.

## 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 L8572/2011/2 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 <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Acceptance, handling, consolidation, treatment and storage of liquid and solid wastes, vehicle movements on the premises, operation of machinery and equipment incl. crushing of drums	Dust	Air / windborne pathway causing impacts to health and amenity	Residential premises located 1.4km north of the Premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions ,1 2, 6, 9, 13, 14, 24, 25, 26 and 29	N/A Dust emissions may also be regulated under general provisions of the EP Act.
	Noise	Air / windborne pathway causing impacts to health and amenity	Residential premises located 1.4km north of the Premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 6, 24, 25, 26 and 29	N/A Noise emissions may also be regulated under the <i>Environmental Protection (Noise) Regulations 1997</i> .
	Odour	Air / windborne pathway causing impacts to health and amenity	Residential premises located 1.4km north of the Premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 15, 18, 19, 20, 24, 25 and 29 <b><u>Conditions 1 and 6</u></b>	In light of perceived odour emissions that may be arising from grease trap wastes at the premises, the Delegated Officer has added conditions to the Licence to ensure that grease trap wastes are stored in containers which are capable of being closed to prevent odour emissions. Additionally, grease trap wastes will be required to be removed from the premises fortnightly, in line with advice received from the City of Kalgoorlie-Boulder (refer to Section 4 below).
	Spills to ground	Runoff to drains or seepage through	Depth to groundwater approximately 2	Refer to Section 3.1	C = Moderate	Y	Conditions 1, 6, 7, 11, 12, 23, 24, 26,	N/A Discharges to the

Licence: L8572/2011/2

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		hardstand and infiltration to soil and groundwater causing impacts to groundwater quality	– 3mbgl.		L = Unlikely <b>Medium Risk</b>		28, and 29	environment may also be regulated under the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .
	Vermin / pest	Air/windborne pathway or transmission via fauna	Residential premises located 1.4km north of the Premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 9, 23, 24, 25 and 29 <b><u>Condition 1</u></b>	Additional regulatory control has been added to the Licence by the Delegated Officer to ensure grease trap wastes are stored in covered containers, which will ensure vermin cannot access this waste type.
Fire incident during waste handling and storage	Fire washwater/ Contaminated stormwater	Overland flow	Surface water within Hannans lake	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 10, 11, 23, 24 and 26	N/A Discharges to the environment may also be regulated under the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .
High contaminants level-post treatment	Contaminants such as heavy metals, hydrocarbons present in remediated soil	Direct Discharge	Contamination of disposal area and groundwater	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 2,3,4, 6, 18, 23, 24 and 25 <b><u>Conditions 3, 4 and 6</u></b>	No verification or testing requirements for waste on acceptance to the premises or post treatment have previously been condition at the premises. The Delegated Officer considers the inclusion of verification and testing requirements on the Licence to be necessary to ensure these processes are being undertaken at the premises.

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								This will in turn ensure that treated waste leaving the premises is suitable for its final disposal location, and an understanding is gleaned into the effectiveness of the waste treatment processes at reducing contaminant concentrations.

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
Application advertised on the department's website on 6 May 2024	None received.	N/A
City of Kalgoorlie-Boulder advised of proposal on 10 May 2024	<p>Comments received on 30 May 2024.</p> <p>Odours from the site are chemical in nature and can be very suffocating and offensive at times.</p> <p>It is suggested that a condition for the management of odour from grease arrestor water be more effective and transported away from the site more regularly (every time the truck dumps grease trap water, it disturbs the tanks, and the odour in winter is more prominent).</p> <p>The fixation process is very odorous especially when the front-end loader is turning the solids in the ponds.</p>	<p>The Delegated Officer considers that the recommendation for removal of grease trap wastes from the premises on a more regular basis is appropriate, given recent complaints received in the vicinity of the premises in relation to odour.</p> <p>As such, the Delegated Officer has added conditions to the Licence requiring grease trap wastes to be removed from the premises fortnightly. Additionally, conditions have also been added to the Licence requiring that the storage area for grease trap wastes have capacity to be covered, which should also act to reduce odour emissions.</p> <p>Should odour continue to be a concern, and should odour emissions be linked to premises operations, the Delegated Officer can review the appropriateness of current Licence conditions and if required, impose additional regulatory controls to further odour emissions.</p>
Department of Mines, Industry Regulation and Safety (DMIRS) advised of proposal on 27 May 2024	None received.	N/A
Applicant was provided with draft documents on 6 June 2024	Refer to Appendix 1	Refer to Appendix 1

## 5. Conclusion

Based on the assessment in this decision report, the Delegated Officer has determined that the renewed licence L8572/2011/2 will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

## 5.1 Summary of amendments

Table 55 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the renewal process.

**Table 5: Summary of licence amendments**

Condition no.	Proposed amendments
1 (Table 1)	Infrastructure and equipment requirements table has been added to the Licence. This table is now a standard condition on new Licences. No additional regulatory control has been imposed through the addition of this condition, except where covers are now required on storage tanks / containers for grease trap wastes.
2 (Table 2)	Table 2 amended to allow for the receipt and storage of: <ul style="list-style-type: none"> <li>• Solvent based-wastes from the production, formulation and use of resins, latex, plasticisers, glues adhesives (waste code F120); and</li> <li>• Septage waste (waste code K210).</li> <li>• Additional waste types / codes included to reflect premises waste acceptance.</li> </ul>
3	Condition added outlining waste acceptance requirements and verification.
4	Condition added outlining that wastes cannot be accepted to the premises unless they can be treated at the premises.
6 (Table 3)	Waste processing table updated to reflect: <ul style="list-style-type: none"> <li>• Reference to the current stabilization manual in use at the premises, as well as how wastes are tested post treatment;</li> <li>• Inclusion of waste testing requirements against the LWCWD post treatment; and</li> <li>• Added requirement for the removal of grease trap waste from the premises fortnightly.</li> </ul>
Conditions 29 and 30	New condition added regarding maintaining accurate and auditable books relating to the calculation of fees, works to be conducted, monitoring programmes and any complaints. This is now a standard condition on new Licences. No additional regulatory control has been imposed through the addition of this condition.
N/A Schedule 2	N1 notification form removed from the Licence.

## 5.2 Summary of changes to the licence

Section 62 of the EP Act provides general power to impose conditions on a licence. Licenses are issued with conditions as per Guidance Statement – Setting Conditions (October 2015) for the purposes of the EP Act to prevent, control, abate or mitigate pollution or environmental harm. Table 6 summarizes the transfer of all appropriate conditions from the expiring licence into the new licence.

**Table 6: Consolidation of licence conditions**

Existing condition	Condition summary	Revised condition	licence	Conversion notes
1	Emissions	N/A		Redundant condition. Deleted from licence.
2	Pollution control and monitoring equipment	N/A		Redundant condition. Adequately covered by alternative existing conditions. Deleted from licence.
3	Recovery and removal of spills	N/A		Redundant condition. Adequately covered by EP (Unauthorised Discharges) Regulations 2004. Deleted from licence.
4	Prevention of contamination and containment of contaminated stormwater	N/A		Redundant condition. Adequately covered by alternative existing conditions and proposed new conditions. Deleted from licence.
5	Record and investigate exceedances of limits or targets	N/A		Redundant condition. Deleted from licence.
N/A	Current infrastructure, equipment and all relevant associated operational requirements.	1	Table 1	New condition added. Revised to current licensing format.
6 Table 1	Waste acceptance	Condition 2	Table 2	Revised to current licensing format and new numbering
N/A	Waste verification	Condition 3		New condition added.
N/A	Waste not to be accepted if premises can't treat it	Condition 4		New condition added
7 Table 2	Waste processing	Condition 6	Table 3	New numbering
8	Waste not meeting the acceptance criteria	Condition 5		New numbering
9	Storage pond management	Condition 7		New numbering
10	Implementing security measures	Condition 8		New numbering
11	Implement control measures to prevent infestations of pests, flies and vermin at the Premises	Condition 9		New numbering
12	Taking all reasonable and practical measures to ensure that no windblown waste escapes from the Premises	Condition 10		New numbering



Existing condition	Condition summary	Revised condition	licence	Conversion notes
13	Maintaining drains, oil traps and sumps	Condition 11		New numbering
14	Removing oil collected from oil traps	Condition 12		New numbering
15	Practical measures to prevent dust emissions	Condition 13		New numbering
16	Visible dust emissions	Condition 14		New numbering
17	Odour control	Condition 15		New numbering
18	Water sampling requirements	Condition 16		New numbering
19	Quarterly monitoring requirement	Condition 17		New numbering
20 Table 3	Monitoring of inputs and outputs	Condition 18 Table 4		New numbering
21	Air monitoring	Condition 19		New numbering
22 Table 4	Ambient air quality monitoring requirement	Condition 20 Table 5		New numbering
23 Table 5	Monitoring of ambient groundwater quality	Condition 21 Table 6		New numbering
24	Records	Condition 22		New numbering and update to wording format
25	Person in charge must be aware of the Licence conditions	Condition 23		New numbering
26	Annual Audit Compliance Report	Condition 24		New numbering
27	Recording complaints	Condition 25		New numbering
28 Table 6	Annual reporting requirements	Condition 26 Table 7		New numbering
29	Information to be provided in the annual report	Condition 27		New numbering
Condition 30 Table 7	Notification requirements	Condition 28 Table 8		New numbering. Reference to N1 form removed from the Licence.
N/A	Standard condition for maintaining books relating to complaints, maintenance of	Condition 29		New condition added. Revised to current licensing format.

Existing condition	Condition summary	Revised condition	licence	Conversion notes
	infrastructure, monitoring results			
N/A	Keeping books specified in condition 29	Condition 30		New condition added. Revised to current licensing format.
Schedule 1: Maps	Premises maps	Schedule 1: Maps		Updated premises plan as provided by licence holder includes details of labelled key infrastructure and location of all monitoring bores
Schedule 2 Reporting & notifications	Form N1 Notification	N/A		Redundant attachment. Deleted from Licence

## 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.

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

Condition	Summary of applicant's comment	Department's response
Condition 1 Table 1	Typographical error noted - Error! Reference throughout the table	Corrected.
Condition 1 Table 1 Row 6, column 2	Typographical changes requested relating to fire hydrants.	Condition has been updated as requested.
Condition 1 Table 1 Row 9, column 2	Typographical changes requested. Reference to design criteria for ponds requested for removal and replacement with 'management' as the ponds have already been designed, sized and built in accordance with original approvals.	Condition has been updated as requested.
Condition 1 Table 1 Row 10, column 2	Typographical changes requested. Reference to design criteria for ponds requested for removal and replacement with 'management' as the ponds have already been designed, sized and built in accordance with original approvals.	Condition has been updated as requested.
Condition 5	Typographical error noted	Corrected.
Condition 28	Request removal of N1 form from the Licence.	N1 form removed as a redundant condition – exiting licence conditions and legislation adequately cover licence holder notification requirements.
Definitions table 5	Typographical changes requested – Suitably qualified chemist definition	Definition updated as requested.
N/A – amendment report	While DWER's stance may differentiate between fixation and absorption, our waste processing flow charts demonstrate a strategic approach to waste management. Fixation is primarily employed for the sludge component of the waste, which typically holds minimal value. At our facility, all incoming oil (J100), along	Noted.

Condition	Summary of applicant's comment	Department's response
	<p>with J120, J130, and J180, undergoes meticulous dewatering and desludging processes, ensuring they are prepared for further reuse and recycling. Similarly, grease trap waste undergoes thorough processing for recycling purposes.</p> <p>Fixation, as implemented in our procedures, targets the residual waste fractions that lack inherent value and possess potential environmental risks if not handled properly. This entails a careful mixing of these waste components with sand, compost, lime, and other reagents. By doing so, we mitigate the risk of leaching into the ground, aligning with the environmental protection objectives outlined in the EP Act.</p> <p>This approach not only addresses regulatory requirements but also underscores our commitment to sustainable waste management practices. Through effective fixation processes, we not only ensure compliance with landfill acceptance criteria but also contribute to minimizing the environmental footprint of waste disposal operations.</p>	

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY			
<b>Application type</b>			
Renewal	<input checked="" type="checkbox"/>	Current licence number:	L8572/2011/1
Date application received		7 March 2024	
<b>Applicant and Premises details</b>			
Applicant name/s (full legal name/s)		Western Resource Recovery Pty Ltd	
Premises location		Hampton Location 221 Reserve 42000 Boulder	
Local Government Authority		City of Kalgoorlie Boulder	
<b>Application documents</b>			
HPCM file reference number:		2012/002663-1	
Key application documents (additional to application form):		1A Occupier Status, Attachment 2 Premises Map Attachment 3B Proposed Activities Application Form Attachment 1A – Executed lease document Attachment 2 - Premises Map Attachment 7 – Environmental Siting map	
<b>Scope of application/assessment</b>			
Summary of proposed activities or changes to existing operations.		<p><i>Licence renewal – no changes to the existing operations</i></p> <p>Total Waste Management Pty Ltd’s facility is located on Hampton Location 221 Reserve 42000 in Boulder, within an area zoned “rural” in the City of Kalgoorlie-Boulder’s Town Planning Scheme #1. The site is located with a buffer of approximately 1.5 km to the nearest sensitive area (residential neighbours).</p> <p>The facility accepts bulk liquid waste from the Goldfields, Perth and other licenced facilities via enclosed tanker trucks and packaged waste on appropriately licenced vehicles. The categories approved for the prescribed premises are shown in section 2 below.</p> <p>All category wastes received at site are treated by the process of Chemical Fixation and Solidification (CFS), though certain categories are pre-treated with other methods before being processed by CFS. Wastes are treated to meet landfill criteria and then disposed of to landfill by licensed controlled waste carriers.</p> <p>The waste treated onsite is mainly oily water, with the oil consisting of engine oil, lubricating products, coolants. In most instances, the waste is treated as soon as it is received so is not considered to be “stored” on site.</p> <p>The main emissions relating to this site will be dust, odour and noise. Dust emissions are controlled via licence condition which requires no visible dust to cross the boundary. Odour emissions have in the past been significant, however, they are currently being managed on site by chemical (lime) means. The environmental risk</p>	

	associated with noise emissions is considered to be low as distance to sensitive receptors is approximately 1.5 km.
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**Category number/s (activities that cause the premises to become prescribed premises)**

**Table 1: Prescribed premises categories**

<b>Prescribed premises category and description</b>	<b>Proposed production or design capacity</b>	<b>Proposed changes to the production or design capacity (amendments only)</b>
Category 61: Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage) is stored, reprocessed, treated or irrigated.	40,000 tonnes per annum	N/A
Category 61A: Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated or discharged onto land.	20,000 tonnes per annum	N/A
Category 62: Solid Waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use	20,000 tonnes	N/A

**Legislative context and other approvals**

Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input checked="" type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input type="checkbox"/> Assignment of lease <input checked="" type="checkbox"/> Expiry: 28 May 2025 Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Approval: Proof of consultation with CKB provided Expiry date:
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: Perth Groundwater Area Type: Proclaimed Groundwater Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Regional office: Swan Avon

<p>Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Name: N/A                  Priority: N/A                  Are the proposed activities/ landuse compatible with the PDWSA (refer to <a href="#">WQPN 25</a>)?                  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>
<p>Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p><i>Environmental Protection (Controlled Waste) Regulations 2004, EP Act, EP (Unauthorised Discharges) Regulations 2004</i></p>
<p>Is the Premises within an Environmental Protection Policy (EPP) Area?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises subject to any EPP requirements?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Classification: NA</p>