



## Application for Licence Amendment

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

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<b>Licence Number</b>	L9139/2018/1
<b>Licence Holder</b>	Suez Recycling & Recovery Pty Ltd
<b>ACN</b>	002 902 650
<b>File Number</b>	DER2018/000926-1
<b>Premises</b>	Suez Welshpool Services Centre 116 Kurnall Road WELSHPOOL WA 6106  Legal description –  Part of Lot 98 on Deposited Plan 2102  As defined by the coordinates in Schedule 2 of the Revised Licence
<b>Date of Report</b>	21/12/2021
<b>Proposed Decision</b>	Revised licence granted

**Melissa Chamberlain**

**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 L9139/2018/1 is held by Suez Recycling & Recovery Ltd for the Suez Perth Services Centre (the Premises), located at 116 Kurnall Road, Welshpool, WA 6106.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L9139/2018/1 has been granted.

The Revised Licence issued as a result of this amendment supersedes the existing Licence previously granted in relation to the Premises. The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

## 2. Scope of assessment

### 2.1 Regulatory framework

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

### 2.2 Amendment summary

On 24 December 2020, the Licence Holder submitted an application to the department to amend Licence L9139/2018/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendment is being sought:

- Installation of a grease trap dewatering system to remove the liquid from the incoming grease trap wastewater; and
- Change premises name to Suez Welshpool Services Centre.

The proposed grease trap wastewater dewatering system is intended to remove the liquid from the incoming grease trap wastewater, resulting in the collection of the solid component of the wastewater in dewatering geotextile bags (geo-bags) and the liquid component flowing into the on-site Microsep wastewater treatment plant (WWTP). The dewatered solids, which will predominantly consist of grease and fat residue, will be transferred to the SUEZ composting facility at the North Bannister Resource Recovery Park, with the geotextile bags going to landfill, also located at the SUEZ North Bannister facility. The resultant liquid wastewater that has passed through the geo-bags will then go through the Microsep WWTP, where it will be treated and subsequently discharged to sewer in accordance with the Water Corporation's acceptance criteria for trade waste (trade waste permit approval No: 14453).

The WWTP treats wastewater from the Suez Welshpool Service Centre floor and wastewater from wash bay areas prior to discharging to sewer. The wastewater is returned to a neutral pH level by treating with acid and alkaline to raise and lower the pH level, stabilizing the level prior to discharge to sewer.

This amendment is limited only to changes to Category 61 activities. No changes to the aspects of the existing Licence relating to Category 61A and 62 have been requested by the Licence Holder.

## 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 construction and operation which have been considered in this Amendment Report are detailed in Table below. Table also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

**Table 1: Licence Holder controls**

Emission	Sources	Potential pathways	Proposed controls
<b>Construction</b>			
Noise	Dewatering pod installation – hooked to the wall	Air / windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> <li>Install only during City of Canning approved operating hours. 7am to 5pm Mon – Fri and 7am – 1pm Sat.</li> <li>Applicant will adhere to the <i>Environmental Protection (Noise) Regulations 1997</i>.</li> </ul>
<b>Dewatering grease trap waste</b>			
Odour	Treatment of grease trap waste	Air / wind dispersion	<ul style="list-style-type: none"> <li>Grease trap waste will be stored in tanks;</li> <li>If odour becomes an issue, then discontinue with the dewatering operation and recommence the removal of the grease trap waste to North Bannister using control waste tankers until odour issues could be resolved;</li> <li>If a particular customer is generating odorous liquid waste, then that load would be removed to North Bannister without processing through the geo-bag system;</li> <li>Inspection and maintenance will be undertaken; and</li> <li>Standard maintenance procedures are expected to effectively mitigate the risk of odour emissions.</li> </ul>
Grease trap waste spill	Pipes or holding tanks failure and overtopping	Direct discharge- Seepage to soils and groundwater	<ul style="list-style-type: none"> <li>The geo-bags and frames will be installed within a hooklift bin, which will be placed under the wastewater discharge pipes. All free liquid will drain out of the geo-bags and through holes in the floor of the hooklift bin. The hooklift bin will be on an existing concrete hardstand that will drain to the WWTP infeed sump; hence, all dewatered wastewater will gravity drain into the WWTP infeed sump and not escape to the environment;</li> <li>Pipelines will be inspected daily to identify leaks, spills or failures; and</li> <li>Sufficient freeboard will be maintained within the tank to ensure overtopping does not occur; and</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> <li>Spill kits maintained and spills immediately cleaned up.</li> </ul>

### 3.1.2 Receptors

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

Table 2 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
Lunch Bar	Approximately 320 metres Northeast Approximately 530 metres Southwest
Residential Premises (Queens Park and East Cannington)	1.2km Southwest and South
Residential Premises (Wattle Grove and Forrestfield) 1.5km and 1.8km Southeast	1.5km and 1.8km Southeast
Residential Premises (Kewdale)	1.9km Northwest
Environmental receptors	Distance from prescribed activity
Groundwater	Natural ground level is approximately 20 mAHD and the surface of the aquifer is approximately 12 mAHD, being approximately 8 m below ground level <sup>1</sup> . Beneficial users of groundwater. Salinity is estimated at between 250 and 500 mg/L. <sup>1</sup>
Perth groundwater area ( <i>Rights in Water Irrigation Act 1914</i> )	Premises is within the proclaimed Perth groundwater area. Beneficial users of groundwater.
Geomorphic wetlands	150 m northwest Artificial water catchment for stormwater that could support aquatic, avian and riparian biota.

Note 1: Source DWER Perth groundwater map <http://www.water.wa.gov.au/maps-and-data/maps/perth-groundwater-atlas>

## 3.2 Risk ratings

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

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

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

The Revised Licence L9139/2018/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

**Table 3. Risk assessment of potential emissions and discharges from the Premises during construction and operation**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
<b>Construction</b>								
Placement of dewatering pod including vehicle movements (reversing beepers).	Noise	Air/windborne pathway causing impacts to health and amenity	Closest residential premises 1.2km southwest and 1.5km south-east	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 18, 19, 20 & 21	N/A
<b>Operation</b>								
Dewatering grease trap waste Vehicle movements	Odour	Air/windborne pathway causing impacts to health and amenity	Closest residential premises 1.2km southwest and 1.5km south-east	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition <u>4</u> , 18, 19, 20 & 21 <b><u>Condition 11, 12 &amp; 13</u></b>	The Delegated Officer considers that the existing and additional licence conditions will adequately address the odour risk. Condition 4 (table 2) amended to allow for the dewatering activity.
	Spills and leaks of grease trap waste	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	The closest surface water body is an artificial lake located 150 metres (m) north-west of the site	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Condition 1, 2, 3, 4, 5, 6, 16, 18, 19, 20 & 21 <b><u>Condition 11, 12 &amp; 13</u></b>	Additional licence conditions authorise the installation of the dewatering pod as per specifications provided in schedule 3 of the revised licence.

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

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

## 4. Consultation

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

**Table 4: Consultation**

Consultation method	Comments received	Department response
The City of Canning advised of proposal on 30/08/2021	The City of Canning replied on 14/09/2021 confirming that the proposed additions/works do not require a development application to be submit to the City of Canning.	Noted
Licence Holder was provided with draft amendment on 22/10/2021	Refer to Appendix 1	Refer to Appendix 1

## 5. Conclusion

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

### 5.1 Summary of amendments

Table 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 amendment process.

**Table 5: Summary of licence amendments**

Condition no.	Proposed amendments
Front Cover page	Premises name change to Suez Welshpool Services Centre
4 (Table 2)	New numbering. Table 3, Table 2 now. Item 4 wording slightly amended. Reference to grease trap waste removed. Item 5 added to allow for the dewatering of the grease trap waste.
11	Added to ensure the installation of the dewatering pod is carried out as per works specified in table 4
12	Added to ensure a construction compliance document is provided once the installation work is constructed
13	Infrastructure and equipment requirements table added according to revised current licensing format
Table 9	Items 13 and 14 added. Definitions for licensed plumbing contractor and qualified professional engineer.
Condition 21 Table 7	New numbering. Condition numbers updated.



Condition 23 Table 8	New numbering.
Schedule 3	Addition of dewatering pod design drawing

**Table 6: Consolidation of licence conditions in this amendment**

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Prescribed Premises Category table	N/A	Revised to current licensing format.
Table 1	Interpretation and definitions	N/A Interpretation section, Definitions and Table 9	Revised to current licensing format.
2 (Table 2)	Premises Operation	Condition 2 Table 1	Revised to current licensing format. New numbering
5 (Table 4)	Containment infrastructure	Condition 5 Table 3	Revised to current licensing format. New numbering
11	Monitoring	Condition 14	New numbering
12	Monitoring	Condition 15	New numbering
13 (Table 5)	Monitoring	Condition 16 Table 6	New numbering
14	Records	Condition 20	New numbering and update to wording format
15	Reporting	Condition 17	New numbering and update to wording format
16	Records	Condition 18	New numbering and update to wording format
17	Reporting	Condition 21	New numbering
18	Reporting	Condition 22	New numbering
19 (Table 7)	Notification	Condition 23 Table 8	New numbering

## 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.
4. Department of Water and Environmental Regulation (DWER), June 2019. *Guideline: Decision Making*, Perth, Western Australia.

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

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Condition	Summary of Licence Holder's comment	Department's response
Condition 13 (b)	Typo error noted	corrected
Condition 20 (e)	Typo error, should refer to Condition 19 instead of 18	corrected
Condition 21	Typo error, should refer to Condition 20 instead of 19	corrected
Schedule 3	Typo error, Schematic spelt incorrectly	corrected

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY						
Application type						
Works approval	<input type="checkbox"/>					
Licence	<input type="checkbox"/>	Relevant works approval number:		None	<input type="checkbox"/>	
		Has the works approval been complied with?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	
		Has time limited operations under the works approval demonstrated acceptable operations?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	
		Date Report received:				
Renewal	<input type="checkbox"/>	Current licence number:				
Amendment to works approval	<input type="checkbox"/>	Current works approval number:				
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L9139/2018/1			
		Relevant works approval number:		N/A	<input checked="" type="checkbox"/>	
Registration	<input type="checkbox"/>	Current works approval number:		None	<input checked="" type="checkbox"/>	
Date application received	24/12/2020					
Applicant and Premises details						
Applicant name/s (full legal name/s)	SUEZ Recycling and Recovery Pty Ltd					
ACN	002 902 650					
Premises name	Suez Perth Service Centre					
Premises location	116 Kurnall Road Welshpool WA 6106					
Local Government Authority	City of Canning					
Application documents						
HPCM file reference number:	DER2018/000926-1					
Key application documents (additional to application form):	Licence amendment application and supporting information: <ul style="list-style-type: none"> <li>- Trade waste permit</li> <li>- Lease information</li> <li>- De watering grease trap waste work instruction</li> </ul>					

	- Site map showing the dewatering pod	
<b>Scope of application/assessment</b>		
Summary of proposed activities or changes to existing operations.	<p>Currently the liquid waste is pumped from the tanker into the 28 kL bulk storage tank. Once the bulk storage tanks have reached their capacity of stored liquid waste in any tank, a Controlled Waste registered bulk road tanker is brought to site to remove the liquid waste to a downstream liquid waste processing facility.</p> <p>The licence holder is proposing to dewater grease trap waste on site and further treating the water at the wastewater treatment plant.</p>	
<b>Category number/s (activities that cause the premises to become prescribed premises)</b>		
<b>Table 1: Prescribed premises categories</b>		
Prescribed premises category and description	Production or design capacity (Assessed – existing licence)	Proposed changes to the production or design capacity (amendments only)
Category 61	36,000 tonnes per annual period	NA
Category 61A	5,000 tonnes per annual period	NA
Category 62	30,000 tonnes per annual period	NA
<b>Legislative context and other approvals</b>		
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: N/A Managed under Part V <input 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: N/A EPA Report No: N/A
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No: N/A
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Existing prescribed premises

Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	No planning approval included with the application. Trade waste permit attached
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"/>	No clearing required
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
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"/>	NA
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: Type: Proclaimed Groundwater Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Name: Premises is within the proclaimed Perth groundwater area Are the proposed activities/landuse compatible with the PDWSA (refer to <a href="#">WQPN 25</a> )? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i> )	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>Environmental Protection (Unauthorised Discharges Regulations 2004</i>
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Classification: listed in DWERS Geocortex viewer as OBJECTID 43575

		CSS_ID 69561 CSS_SITE_ID 10029  Date of classification: Information Request Trim ID- DER2016/1247
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