

24th May 2019

Project Manager
WARR Regulations Amendments
Waste Avoidance and Resource Recovery
Department of Water and Environmental Regulation
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Submission for Proposed estimation/calculation methods for non-metropolitan landfills receiving more than 20,000 tonnes of waste per annum under proposed amendments to the Waste Avoidance and Resource Recovery Regulations 2008

Dear Jill,

We thank you again for the opportunity to review the proposed amendments and provide feedback as a liable recycler. We provide our feedback to your questions as set out in the paper as well as any other issues we see may arise out of the suggested amendments.

Premium Waste Management is a non-metropolitan landfill located in Waroona and currently also has a licenced transfer station and sand quarry.

We accept waste direct to landfill as well as waste to our transfer station that requires sorting and processing to divert recyclables from landfill. Majority of country waste is unsorted and direct from site so can undergo rigorous sorting to salvage a multitude of recyclable materials, greatly reducing the amount sent to landfill.

We currently use weighbridge software to record all incoming and outgoing material for the annual audits due by the DWER.

We list below our questions and queries that refer to our landfill/recycling facility:

1. Are the proposed material categories practical and appropriate for the Western Australian landfill industry?

We propose you add the additional categories to Table 4:

Incoming:

Mixed inert Waste	100% of waste to landfill is mixed to some description.
Asbestos	100% of asbestos is buried to landfill
Contaminated Sand	100% of contaminated loads would be buried direct to landfill
Asbestos Contaminated Sand	100% of asbestos is buried to landfill

Outgoing:

Landfilling means there is no outgoing from landfill. Any outgoings would be captured at the recycling level via the Transfer Station. The only time this would ever occur would be if a non-compliant load arrived and had to be reloaded in which case a reversal of the amount would be applied.

2. Are the proposed calculation methods to estimate the weigh of waste received, disposed, leaving and stockpiled at your site clear? If not, what further clarification is required?

We have a weighbridge onsite which records all incoming waste to landfill. As there is no outgoing from landfill there is only one number recorded. The calculation proposed would be correct.

Estimating the weight of stockpiles – in landfilling there are no stockpiles. All waste for landfilling is recorded and buried accordingly.

3. Are there any barriers that would prevent your organisation from using these calculation methods? If so, what are they and how can they be overcome?

We already have a weighbridge installed for recording at our own expense. How do you propose other sites meet these same criteria?

4. Are the proposed default material densities appropriate for the Western Australian landfill industry?

Again the material densities that are applicable to our site do need further measuring and confirmation as some are clearly incorrect. ie Sand does not equate to 1:1

However for our landfilling activities none of this is relevant to us as we have a weighbridge and do not have any stockpiles in our landfill.

Also bulk densities are acceptable for sites that have incoming waste loads of one type of material at a time and then outgoing loads are also one type of material.

When all loads incoming are mixed waste loads of multiple materials and densities it is impossible to determine any weight amount of each and every load and each and every subsequent stockpile.

5. Other Queries:

Surveys:

- if this is being proposed then who pays?

Recording of Incoming Waste

- All landfills state-wide receiving waste should be required to report to DWER.
- What recording are Metropolitan landfills subjected to?

Penalties

- What are the penalties for not reporting? What will be the consequences to non-metropolitan landfills that accept waste and do not record and report to you?

Kind Regards,



Kristy Sumich
Director