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End-of-waste Review
Department of Environment Regulation
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A draft DER Guideline: Submitting an application for the use of waste-derived Materials (case-by-case determination). ChemCentre Comments

Thank you for giving ChemCentre the opportunity to comment on this initiative. ChemCentre regards this initiative as a significant step forward in ensuring the safe use of waste-derived materials to benefit the environment, improve agricultural productivity and divert potentially useful materials from increasingly scarce and costly landfill.

In regards to the draft DER Guideline document:

Section 4.2 Risk assessment

Leach tests

It is stated that “Where a WDM is intended for widespread use, DER will generally require that variable-pH leaching tests, and variable liquid-to-solid ratio tests on the material will be undertaken using the *US EPA Leaching Environmental Assessment Framework (LEAF) test method 1313*”.

Reference should also be made to the other three US EPA LEAF test methods 1314, 1315 and 1316 that are part of a total set of four LEAF test methods. The other LEAF methods should be utilised as appropriate, as determined by the specific material and potential receiving environment and/or intended end-use.

ChemCentre has experience in the use of the US EPA LEAF test methods and in the near future will adopt the associated tools and predictive models to inform and support product and by-product utilisation, i.e. the Leaching Environment Assessment Framework (LEAF). ChemCentre is currently in discussion with MRIWA, Alcoa, Water Corporation, Iluka and DER as how to best validate these tests for waste-derived materials in WA.

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