



# Amendment Report

<b>Licence Number</b>	L5154/1989/10
<b>Licence Holder</b>	Schutz Australia Pty Ltd
<b>ACN</b>	090 995 958
<b>File Number:</b>	2010/005556-1
<b>Premises</b>	Schutz Australia Pty Ltd 146-152 Cockburn Road NORTH COOGEE WA 6163 Being Lot 201 on Plan 57076, Lot 222 on Diagram 94448 and Lot 22 on Diagram 21661 as depicted in Schedule 1.
<b>Date of Report</b>	22 July 2019
<b>Decision</b>	<b>Amendment Granted</b>

# 1. Definitions and interpretation

## Definitions

In this Amendment Report, the terms in Table 1 have the meanings defined.

**Table 1: Definitions**

Term	Definition
ACN	Australian Company Number
Amendment Report	refers to this document
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer. CEO for the purposes of notification means:  Director General Department Administering the <i>Environmental Protection Act 1986</i> Locked Bag 33 Cloisters Square PERTH WA 6850 <a href="mailto:info@dwer.wa.gov.au">info@dwer.wa.gov.au</a>
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Review
Licence Holder	Schutz Australia Pty Ltd
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Amendment Report

Term	Definition
	applies, as specified at the front of this Amendment Report.
Revised Licence	the amended Licence issued under Part V, Division 3 of the EP Act, with changes that correspond to the assessment outlined in this Amendment Report.
Risk Event	as described in <i>Guidance Statement: Risk Assessment</i>

## 2. Amendment Description

The following guidance statements have informed the assessment and decision outlined in this Amendment Report.

- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

### 2.1. Purpose and scope of assessment

On 29 May 2019, Schutz Australia Pty Ltd (the Licence Holder) submitted an application to the Department of Water and Environmental Regulation (DWER) to amend L5154/1989/10. The Licence is for a Prescribed Premises Category 62 solid waste depot in North Coogee, Western Australia. The Premises is operated as an agricultural/industrial drum and container recycling business.

The scope of the amendment application relates to the addition of a new item of wastewater treatment infrastructure, a Hydroxon Plant, to the Premises. A primary water treatment process is currently used at the Premises to treat wash-water from IBCs and drums. The Hydroxon Plant will be used for secondary treatment of wash-water discharged from the primary wastewater treatment plant.

Table 2 lists the documents and information provided with the amendment application and submitted as part of the assessment process. The assessment was also informed by an onsite meeting between DWER personnel and Plant Manager Scott Willis.

**Table 2: Licence amendments**

Document/information description	Date received
Application Form (Amendment) signed by Managing Director Alan Barham and attached supporting documentation	19 May 2019
Response to Request for Information letter issued 14 June 2019, provided by Jeff Shivak of Enpoint	27 June 2019

### 2.2. Background

Addition of the Hydroxon Plant to the wash-water treatment process on the Premises was implemented to reduce glyphosate concentrations in wastewater discharged to the Water Corporation sewer. Glyphosate concentrations in water treated through the existing wastewater treatment plant are above new Trade Waste Criteria imposed by the Water Corporation.

The main source of wastewater treated at the Premises is wash-water from IBCs and drums which formerly contained hydrocarbons, pesticides or herbicides. Wash-water undergoes primary treatment using a bentonite polymer blend in the existing wastewater treatment plant. Secondary treatment will occur via catalytic advanced oxidation in the Hydroxon Plant.

The Hydroxon Plant will be housed on hardstand in a fully enclosed and bunded shed. Holding tanks in a bunded hardstand area adjacent to the Hydroxon Plant shed will be used to store wash-water which has undergone primary treatment and is pending secondary treatment. The design capacity for the Hydroxon Plant will not exceed 25 m<sup>3</sup>/day.

Chemicals which will be used in the process include ferric chloride coagulant, sodium

hydroxide based alkali, potassium permanganate oxidant and sodium hypochlorite. The Hydroxon Plant is expected to produce a pH neutral waste sludge in a volume equivalent to approximately 3% of the volume of processed wastewater. Waste sludge will be dried in a skip bin and then removed offsite by a waste management company.

Installation of the Hydroxon Plant has commenced and commissioning activities are expected to occur between June and October 2019. The verification process will occur over a three month period and involve testing to ensure that the Trade Waste Criterion for glyphosate is met.

### 3. Amendment history

Table 3 provides the amendment history for L5154/1989/10.

**Table 3: Licence amendments**

Instrument	Issued	Amendment
L5154/1989/10	06/11/2014	Licence re-issue and conversion to REFIRE format
L5154/1989/10	09/11/2016	Licence amended (Amendment Notice 1) to update ACN
L5154/1989/10	22/07/2019	Licence amended to include Hydroxon Plant infrastructure

### 4. Location and receptors

Table 4 below lists the relevant sensitive land uses currently in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

**Table 4: Receptors and distance from activity boundary**

Residential and sensitive premises	Distance from Prescribed Premises
Current – Residential premises	400 metres to the north-east
Current – Industrial premises	Adjacent to northern, southern and western boundaries

The Premises is within the Cockburn Coast Development Area (DA33) and under the Cockburn Coast District Structure Plan is zoned for residential, mixed-use and local activity node purposes (DPLH, 2019; WAPC, 2009). Potential future receptors related to these zonings were not considered as they are considered beyond the scope of the current assessment.

Table 5 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

**Table 5: Environmental receptors and distance from activity boundary**

Environmental receptors	Distance from Prescribed Premises
Surface water	Indian Ocean is 450 metres to the west
Green Growth	Vegetation Complexes Commitments (Cottesloe Complex – Central and South) – 30 m and 350 m to the west  Quenda Commitments Swan Coastal Plain Habitat Probability 0.5-0.9 areas – adjacent to western boundary

Groundwater	<p>Depth to groundwater varies between 11 m at the western boundary and 30 m at the eastern boundary; groundwater contours indicate that groundwater flows towards the Indian Ocean to the west.</p> <p>The City of Cockburn holds a licence (GWL49535) to extract groundwater from the superficial aquifer at a location which is down-gradient of the northern portion of the Premises, but not directly down-gradient of the Hydroxon Plant.</p>
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## 5. Risk assessment

Table 6 below describes the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. This table identifies whether the emissions present a material risk to public health or the environment and outlines relevant regulatory controls.

Odours were not included in the risk assessment because the Licence Holder advised that the Hydroxon Plant will not produce odour emissions as it will be fully enclosed and no ventilation is required.

**Table 6: Risk assessment for proposed amendments during operation**

Risk Event				Consequence rating <sup>1</sup>	Likelihood rating <sup>1</sup>	Risk <sup>1</sup>	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
Hydroxon Plant	Spills and unintended releases of wastewater or treatment chemicals	Infiltration to groundwater, migration down-gradient to impact marine environment and groundwater dependent terrestrial ecosystems	Hydroxon Plant and holding tanks located on bunded hardstand pad	Specific Consequence Criteria (for environment) at risk of not being met  <b>Moderate</b>	May only occur in exceptional circumstances  <b>Rare</b>	<b>Medium</b>	The Delegated Officer considers that siting of the Hydroxon Plant and holding tanks on bunded hardstand areas provides sufficient mitigation of this Risk Event.	Existing Licence Conditions 1.2.2, 1.2.3, 1.2.4  Revised Licence Condition 1.3.3
		Infiltration to groundwater, migration down-gradient to impact City of Cockburn extraction bore		Specific Consequence Criteria (for public health) at risk of not being met  <b>Moderate</b>	May only occur in exceptional circumstances  <b>Rare</b>		The Delegated Officer considers that siting of the Hydroxon Plant and holding tanks on bunded hardstand areas provides sufficient mitigation of this Risk Event. The likelihood is also reduced because the City of Cockburn extraction bore is not directly down-gradient of the Hydroxon Plant.	

Risk Event				Consequence rating <sup>1</sup>	Likelihood rating <sup>1</sup>	Risk <sup>1</sup>	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
<b>Hydroxon Plant</b>	Spills and unintended releases of wastewater or treatment chemicals	Discharge of contaminated stormwater offsite and exposure to the public and terrestrial fauna	Hydroxon Plant and holding tanks located on bunded hardstand pad and existing stormwater management practices	Mid level impact to amenity  <b>Moderate</b>	May only occur in exceptional circumstances  <b>Rare</b>	<b>Medium</b>	Stormwater may discharge from the site during heavy rain events, as occurred in September 2017 (ICMS 46732).  The Delegated Officer considers that bunding of the Hydroxon Plant and holding tanks, combined with stormwater management practices are appropriate controls to prevent contamination of stormwater and subsequent discharge offsite.	Existing Licence Conditions 1.2.2, 1.2.3, 1.2.4 and 1.2.5  Revised Licence Condition 1.3.3
<b>Hydroxon Plant</b>	Noise	Dispersal via air to residential area 560 m to the north-east of the Hydroxon Plant or adjacent industrial premises	Hydroxon Plant located within a fully enclosed shed	Minimal local scale impacts  <b>Slight</b>	May only occur in exceptional circumstances  <b>Rare</b>	<b>Low</b>	The Delegated Officer considers the risk of noise emissions to be low as the Hydroxon Plant does not produce significant noise and is fully enclosed in a shed.	N/A

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Department's Guidance Statement: Risk Assessments (February 2017)



## 6. Conclusion

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

### 6.1. Summary of amendments

Table 7 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 7 Licence amendments**

Condition No.	Proposed amendments
1.1.2	Definitions updated to reflect department name changes and add some new definitions.
1.2.3	Reference to the Code of Practice for the Storage and Handling of Dangerous Goods removed and replaced with reference to relevant codes of practice approved in accordance with section 20 of the <i>Dangerous Goods Safety Act 2004</i> .
1.3.3	Inclusion of new controls on the storage of wash-water prior to treatment in the primary and secondary wastewater treatment plants. Inclusion of requirement to treat wash-water prior to discharge to the sewer.
1.3.6	New condition requiring waste sludge produced during wastewater treatment to be disposed of to a licensed or registered premises.
Schedule 1	Site Plan updated to show the location of the Hydroxon Plant, stormwater and wastewater infrastructure.

### 6.2. Licence Holder comments

The Licence Holder was provided with the draft Amendment Report on 18 July 2019 for review and comment. The Licence Holder responded on 19 July 2019 waiving the remaining comment period (until 9 August 2019). No comments were submitted on the draft Amendment Report.

## **A/MANAGER WASTE INDUSTRIES REGULATORY SERVICES**

*An officer delegated by the CEO under section 20 of the EP Act*

## Appendix 1: Key documents

	Document title	In text ref	Availability
1	Licence L5154/1989/10	L5154/1989/10	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
2	DER, October 2015. <i>Guidance Statement: Setting conditions.</i> Department of Environment Regulation, Perth.	DER 2015b	
3	DER, November 2016. <i>Guidance Statement: Environmental Siting.</i> Department of Environment Regulation, Perth.	DER 2016a	
4	DER, February 2017. <i>Guidance Statement: Decision Making.</i> Department of Environment Regulation, Perth.	DER 2017a	
5	DER, February 2017. <i>Guidance Statement: Risk Assessment.</i> Department of Environment Regulation, Perth.	DER 2017b	
6	DPLH, 2019. <i>City of Cockburn Town Planning Scheme No. 3</i> , as updated 26 February 2019. Department of Planning, Lands and Heritage, Perth.	DPLH 2019	accessed at <a href="http://www.dplh.wa.gov.au">www.dplh.wa.gov.au</a>
7	Western Australian Planning Commission, 2009. <i>Cockburn Coast District Structure Plan.</i> September 2009, Perth.	WAPC 2009	