



<b>Licence Number</b>	L6917/1997/8
<b>Licence Holder</b>	Town of Port Hedland
<b>File Number:</b>	DER2014/000670
<b>Premises</b>	South Hedland Landfill Reserve 41342 North Circular Road SOUTH HEDLAND WA 6721  Being Lot 5813 on Plan 189435
<b>Date of Amendment</b>	03/09/2018

## Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* (EP Act) as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act.

Rebecca Kelly  
MANAGER WASTE INDUSTRIES

*An Officer delegated under Section 20  
of the Environmental Protection Act 1986 (WA)*

# Definitions and interpretation

## 1. Definitions

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

**Table 1: Definitions**

Term	Definition
Amendment Notice	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 info@dwer.wa.gov.au
DFES Tyre Guidelines	Department of Fire and Emergency Services published <i>Guidance Note GB02: Bulk Storage of Rubber Tyres including Shredded and Crumbed Tyres</i>
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	Town of Port Hedland
m <sup>3</sup>	cubic metres
Occupier	has the same meaning given to that term under the EP Act.
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Decision Report applies, as

	specified at the front of this Decision Report.
Risk Event	as described in <i>Guidance Statement: Risk Assessment</i>
Tyre Pile	means four individual tyre stacks or bales of tyres grouped together.

## Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the Licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

This notice is limited only to an amendment for Category 57 and 64. No changes to the aspects of the original Licence relating to Category 61 have been requested by the Licence Holder.

The following guidance statements have informed the decision made on this amendment

*Guidance Statement: Regulatory Principles (July 2015)*

- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Land Use Planning (February 2017)*
- *Guidance Statement: Licence Duration (August 2016)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

## 2. Amendment description

This amendment was initiated by the Department of Water and Environmental Regulation (DWER). Due to an administrative error the comments from the Town of Port Hedland were not taken into account in Amendment Notice 1. The Amendment is to rectify this and incorporate the comments.

## 3. Requested amendments

The Licence Holder was provided with the draft Amendment Notice 1 on 30 May 2018 for review and comment. The Licence Holder responded on 12 June 2018. The comments are displayed in Table 2.

**Table 2: Licence Holders Comments**

Condition	Summary of Licence Holder comment	DWER Response
1.3.14 (a) - (g)	<p>It is understood that these Conditions correspond directly to the recommendations provided by DFES Guidance Note: GN02. However, the Licence Holder is unclear how practical these recommendations are for approximately 25,000m<sup>3</sup> of tyres that are currently stored at the Site. Unlike the tyres depicted in the DFES Guidance Note: GN02, the tyres at the Site vary in size and weight from relatively small car tyres to large mining equipment tyres.</p> <p>Creating stacks (with a smaller footprint but higher) as opposed to the current stockpiles would be difficult and may increase the risk of falling hazards and other safety concerns for the Site staff.</p> <p>In addition, all previous correspondence between the Licence Holder and the DWER have discussed compliance with the current Licence Conditions, which are the following:</p> <ul style="list-style-type: none"> <li>• Each stockpile is 10m x 10m or a maximum of 100m<sup>2</sup> in area</li> <li>• Each stockpile is a maximum of 3m in height; and</li> <li>• Each stockpile is 2.5m distant from the next stockpile</li> <li>• Stockpiled Tyres need to be stored on and on level ground</li> <li>• Stockpiled tyres need to be located at distances greater than 10m from all Landfill boundary fences</li> </ul> <p>The Licence Holder has already relocated stockpiles to be compliant with the current Licence Conditions. It would be impractical and costly to retrospectively apply new conditions and rearrange the stockpiles for a second time. It would also be unrealistic to have one set of stockpiles under the old</p>	<p>The Delegated Officer has considered the comments and agree to revert back to the existing conditions for the tyre stockpile and storage.</p> <p>The agreement in December 2017 between the Town of Port Hedland (ToPH) and DWER regarding the tyre stockpile reduction and compliance with the existing stockpile conditions has already been risk assessed and agreed to in consultation with DFES prior to the DFES Guidelines being published in 2018.</p> <p>The ToPH have stated that 100% of the stockpiles will be shredded by February 2019, therefore requiring the ToPH to comply with the DFES Tyre Guidelines relating to stockpiles is impractical as the stockpiles have already been arranged as per the existing licence conditions. As the existing conditions were completed in consultation with DFES DWER is satisfied that the risk is being managed.</p>

	<p>licence conditions and any new stockpiles set to different conditions if this was proposed to be implemented going forward.</p> <p>The current Licence Conditions provide sufficient risk mitigation measures that are practical and have already been carried out by the Licence Holder for most of the tyre stockpiles at the Site in accordance with the requested actions by the DWER in December 2017.</p> <p>Therefore, the Licence Holder requests that the DWER review the practicality of using the DFES Guidance Note: GN02 for the Site with regards to Conditions 1.3.14 (a) – (g).</p>	
1.3.14 (f)	<p>There are approximately 25,000m<sup>3</sup> of tyres that are currently stored at the Site, therefore it would be impractical to comply with the new separation distances as set out in Condition 1.3.14 (f). The revised stacking and separation distances would considerably increase the actual area designated for tyre stockpiling. Therefore, the Licence Holder requests that this Condition be removed. The current 4m separation distance between each stockpile provides sufficient space for fire-fighting trucks to maneuver between tyre stockpiles in case of a tyre fire.</p>	<p>The Delegated Officer has considered the comments and agree to revert back to the existing conditions for the tyre stockpile and storage.</p> <p>The agreement in December 2017 between the Town of Port Hedland (ToPH) and DWER regarding the tyre stockpile reduction and compliance with the existing stockpile conditions has already been risk assessed and agreed to in consultation with DFES prior to the DFES Guidelines being published in January 2018.</p> <p>The ToPH have stated that 100% of the stockpiles will be shredded by February 2019, therefore requiring the ToPH to comply with the DFES Tyre Guidelines relating to stockpiles is impractical. As the existing conditions were completed in consultation with DFES DWER is satisfied that the risk is being managed.</p>
1.3.14 (m) & (n)	<p>To reduce current stockpiles, the Licence Holder intends to shred approximately 6,000 tonnes of tyres, and it would be practically impossible to comply with Condition 1.3.14 (m) and (n). The conditions requirements cannot be readily measured against and thus implemented at the Site. Therefore, the</p>	<p>The Delegated Officer has considered the ToPH's comments regarding tyre shreds having less than 1% (by weight) of metal fragments that are not at least partially encased in rubber and metal fragments that are partially encased in rubber shall protrude no more</p>

	<p>Licence Holder requests that this Condition be removed. It is unclear how the Town could practically measure performance against the Condition or how the DWER will be able to enforce it.</p>	<p>than 25mm from the cut end of the tyre shred on 75% of the pieces and by no more than 50mm on 100% of the pieces.</p> <p>DWER agrees that this is impractical to enforce or audit and agree to remove these conditions.</p>
1.3.14 (o)	<p>The Licence Holder proposes to modify Condition 1.3.14 (o) to better reflect the intended purpose on this Condition. The modification is as follows:</p> <p><i>“(p) tyre shreds shall be stockpiled and buried in cleared areas free of vegetation and other combustible or flammable materials”</i></p> <p>In the initial Licence Amendment documentation, it was proposed that the tyre shreds are buried in unlined cells and the layers are to be separated by 300mm thick soil layers. The DWER has acknowledged that this proposed burial method satisfies the EP Regulations 1987, Part 6 (Refer to page 8 on this draft review).</p> <p>The Condition was taken directly from the DFES Guidance Note: GN02, which does not provide specific recommendations on the use of tyre monocells. This modification makes the Condition more applicable to the proposed works described in the initial Licence Amendment documentation.</p>	<p>The Delegated Officer has considered the ToPH’s comments regarding modifying the condition stating: <i>there is to be no direct contact between tyre shred and soil containing organic material e.g. topsoil.</i></p> <p>DWER has agreed to modify the condition to be more specific as the DFES guidelines is not specific in relation to monocell burial of tyres.</p>
1.3.14 (p)	<p>Due to the proposed removal of flammable and combustible material (e.g. vegetation) from the areas of the tyre monocells as stipulated in revised Condition 1.3.14 (o), the Licence Holder requests that Condition 1.3.14 (p) be removed.</p> <p>Stockpiled/placed tyre shreds are extremely compressible, it is therefore uncertain how a geotextile can be safely installed over the shreds prior to soil placement. The shreds cannot be safely/manually traversed until the soils are placed to provide a</p>	<p>The Delegated Officer has considered the ToPH’s comments regarding the placement of a geotextile layer between the shredded tyres and the soil cover.</p> <p>Due to Condition 1.3.14 (o) being changed to be more site specific for the monocell burial of tyres, this condition will be removed.</p>

	firm bedding for trafficking. The Licence Holder therefore requests that Condition 1.3.14 (o) 'separation geotextile' prior to soils placement is removed.	
1.3.15 (a)	<p>Extinguishing a tyre fire can be a difficult task and the volume of water and fire-fighting equipment required depends on the extent and severity of the tyre fire. The Site currently maintains sufficient fire-fighting equipment to manage an initial tyre fire until further equipment/services can be brought onto Site as appropriate. Therefore, the Licence Holder recommends that Condition 1.3.15 (a) be modified as follows:</p> <p><i>“(a) ensure that firefighting equipment stored onsite is capable of managing a tyre fire until it is either extinguished, or capable of controlling the fire until further firefighting equipment/services can be brought onsite to assist with extinguishing the tyre fire;”</i></p>	The Delegated Officer has considered the ToPH's comments regarding the extinguishing of a tyre fire and agrees to the changes to make it more consistent with on-site fire management protocols.

## 4. Risk assessment – Air emissions in the event of a tyre fire

### Description of air emissions during a tyre fire

Tyre fires can break down the tyres into hazardous compounds including gases, heavy metals and oils. Emissions may include particulates, carbon monoxide (CO), sulfur oxides (SO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>), and volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), benzene, styrene, phenols butadiene and heavy metals. In addition, firefighting foam may contain hazardous materials including surfactants, emulsifiers, modifiers, pyrolytic oils and potentially perfluorooctanoic acid (PFOA) and per and poly-fluoroalkyl substances (PFAS)

### Identification and general characterisation of emission

Used tyres pose a considerable risk to the public and the environment due to the potential discharges and emissions produced during tyre fires. Tyre fires are difficult to extinguish and as such pose additional risk of spreading to other areas beyond the Premises. The intense radiant heat produced during a tyre fire can also inhibit fire-fighting efforts, and the incomplete combustion of tyres can cause a health risk from inhalation of particulates.

### Description of potential adverse impact from the emission

Toxic gases from fire smoke can significantly impact the respiratory systems of the general public through inhalation and particulates and gases. Emissions generated from combustion of tyres will contain a number of pollutants that can cause significant acute and chronic health impacts to firefighters and nearby residents. Depending on the length and degree of exposure, these health effects could include irritation of the skin, eyes and mucous membranes, respiratory effects, central nervous system depression and cancer.

### Criteria for assessment

The National Environment Protection (Ambient Air Quality) Measure (NEPM) 2003 recommends air quality standards that must be maintained. The potential discharges to air that will occur during a tyre fire on the Premises would contain mostly very fine particulates that can cause significant health impacts if inhaled. The NEPM contains criterion for these fine particles (PM<sub>2.5</sub>) which have been applied to inform this Assessment.

### Applicant controls

Potential sources of ignition will be restricted in the tyre storage and processing areas and fire-fighting equipment will be maintained on the Premises.

The burning time and severity of tyre fires can be reduced by the appropriate storage of whole and shredded tyres. The Applicant has moved one mono stockpile of over 50 000 tyres into individual stockpiles compliant with their existing licence. These stockpile heights and widths were previously agreed to and risk assessed for fire and safety hazards in consultation with DFES.



This assessment has reviewed the controls set out in Table 5 below.

Control	Description
Infrastructure	<p>All tyres (whole and shredded) will be stored according to the agreed storage requirements within the existing licence prior to the DFES Guidelines being published.</p> <ul style="list-style-type: none"> <li>• Storage of tyres (whole and shredded) will be located on a level hardstand clear of rubbish and combustible materials.</li> <li>• The Premises will be enclosed by fences to prevent arson</li> <li>• The existing water storage on site consists of: <ul style="list-style-type: none"> <li>○ 1 x 450 m<sup>3</sup> tank with 5 days continuous flow water storage capacity</li> <li>○ 1 x 10 000L storage tank (containing mains water)</li> <li>○ 1 x 10 000 L water truck on site.</li> </ul> </li> </ul>
Management	<ul style="list-style-type: none"> <li>• The Premises will be secured when unattended</li> <li>• The Licence Holder is required to comply with the prescribed standard for tyre storage and burial, as set out in the Environmental Protection Regulations 1987, Part 6 – Tyres.</li> <li>• Part 6 – Tyres, stipulate that tyres must be buried under a final soil cover of no less than 500 mm. The batches must be separated by at least 100 mm of soil and each consisting of not more than 40 m<sup>3</sup> of tyres reduced to pieces</li> <li>• The licence holder intends to cap the shredded tyre cell with a minimum of 1000 mm of restoration soils and 300 mm of soil separating the cell layers. This is more that the stipulated cover in the EP Regulations, Part 6 – Tyres.</li> </ul>

#### 4.1.1 Consequence

If emissions are released from a tyre fire within the Premises, then the Delegated Officer has determined that the impact of emissions of this fire will be a local scale impact with mid-level adverse health effects requiring medical treatment. Therefore, the Delegated Officer considers the consequence of air emissions during a tyre fire to be **Major**.

#### 4.1.2 Likelihood of consequence

Based upon the Licence Holder's controls and proximity to residences the Delegated Officer has determined that the consequence of air and gas emissions from a fire may only occur in exceptional circumstances. Therefore, the Delegated Officer considers the likelihood to be **Rare**.

#### 4.1.3 Overall rating of air emissions during a tyre fire

The Delegated Officer has compared the consequence and likelihood ratings described above with the Risk Rating Matrix (**Error! Reference source not found.**) and determined that the overall rating for the risk of negative health impacts from air emissions during a fire is **Medium**

#### 4.1.4 Key findings

The Delegated Officer has reviewed the information regarding the impact of air emissions on residents generated during a tyre fire and has found:

1. *Shredded tyres are more ignitable than whole tyres given the increased surface area for combustion.*
2. *The previous licence did not include regulatory controls in relation to shredded tyres or burial.*
3. *Tyre storage controls can reduce the risk of impacts from fire;*
4. *Storage of used tyres can be regulated through conditions of the licence; and*
5. *The risk event is acceptable subject to multiple regulatory controls.*

## 5. Decision

The Delegated Officer has determined that an amendment be made to the Licence with the inclusion of licence conditions.

Condition 1.3.14 and 1.3.15 have been updated to include the requirements for tyre storage agreed to with DWER and DFES prior to the DFES Tyre Guidelines being published and are the existing licence conditions for the storage of tyres.

The Delegated Officer considers the amendment of burying shredded tyres will increase the risk of emissions at the premises.

The Delegated Officer considers the additional conditions are appropriate and in line with other premises as assessed across the State, and in accordance with DWER's regulatory approach.

The Delegated Officer has considered DWER's *Guidance Statement: Regulatory Principles*, *Guidance Statement: Setting Conditions* and *Guidance Statement: Risk Assessment* in granting this amendment, and consider that this amendment will impact the risk profile of the premises, which is currently considered as Medium. The risk profile has changed to High.

Conditions 1.1.3 through to 3.3.1 currently on the Licence capture operational emissions relating to tyre storage, landfilling and receiving and treating liquid waste.

## 6. Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice on 21 August 2018. The Licence Holder responded on 22 August 2018. The comments received on the draft Amendment Notice are summarised in Appendix 2. The Licence Holder requested that the remainder of the 21 day comment period be waved, should the Department deem the changes acceptable.

Amendment Notice 1 was granted following that correspondence.

## 7. Amendment

1. Condition 1.3.14 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:

- 1.3.14 The Licensee shall ensure that tyre storage and burial complies with the following:
  - (a) ~~a maximum of four individual stacks can be grouped;~~
  - (b) each stockpile stack is located at a minimum of 10 ~~18~~ m from any fence, combustible materials or walls;
  - (c) each stockpile stack is a maximum of 100 ~~60~~ m<sup>2</sup> in area;
  - (d) each stockpile stack is a maximum of 3 m ~~3.7 m~~ in height,
  - (e) a minimum separation distance of 2.5 m at the base must be maintained between stockpiles stacks;
  - (f) ~~a clear separation distance of no less than 18 m must be maintained between each tyre pile (4 stacks);~~
  - (g) buried tyre chip layers are less than 3 m deep,
  - (h) tyre shreds shall be free of contaminants such as oil, grease, petrol and diesel fuels that could create a fire hazard,
  - (i) in no case should the tyre shreds contain the remains of tyres that have been subjected to fire,
  - (j) tyre shreds shall have a maximum of 25% (by weight) passing a 38mm sieve,

- (k) tyre shreds shall have a maximum of 1% (by weight) passing a 4.75mm sieve,
- (l) tyre shreds shall be free of fragments of wood, wood chips and other fibrous organic matter, and
- ~~(m) tyre shreds shall have less than 1% (by weight) of metal fragments that are not at least partially encased in rubber,~~
- ~~(n) metal fragments that are partially encased in rubber shall protrude no more than 25mm from the cut end of the tyre shred on 75% of the pieces and by no more than 50mm on 100% of the pieces,~~
- (o) ~~there is to be no direct contact between tyre shred and soil containing organic material e.g. topsoil;~~  
tyre shreds shall be stockpiled and buried in cleared areas free of vegetation and other combustible or flammable materials.
- ~~(p) tyre shred to be separated from soil with a geotextile.~~

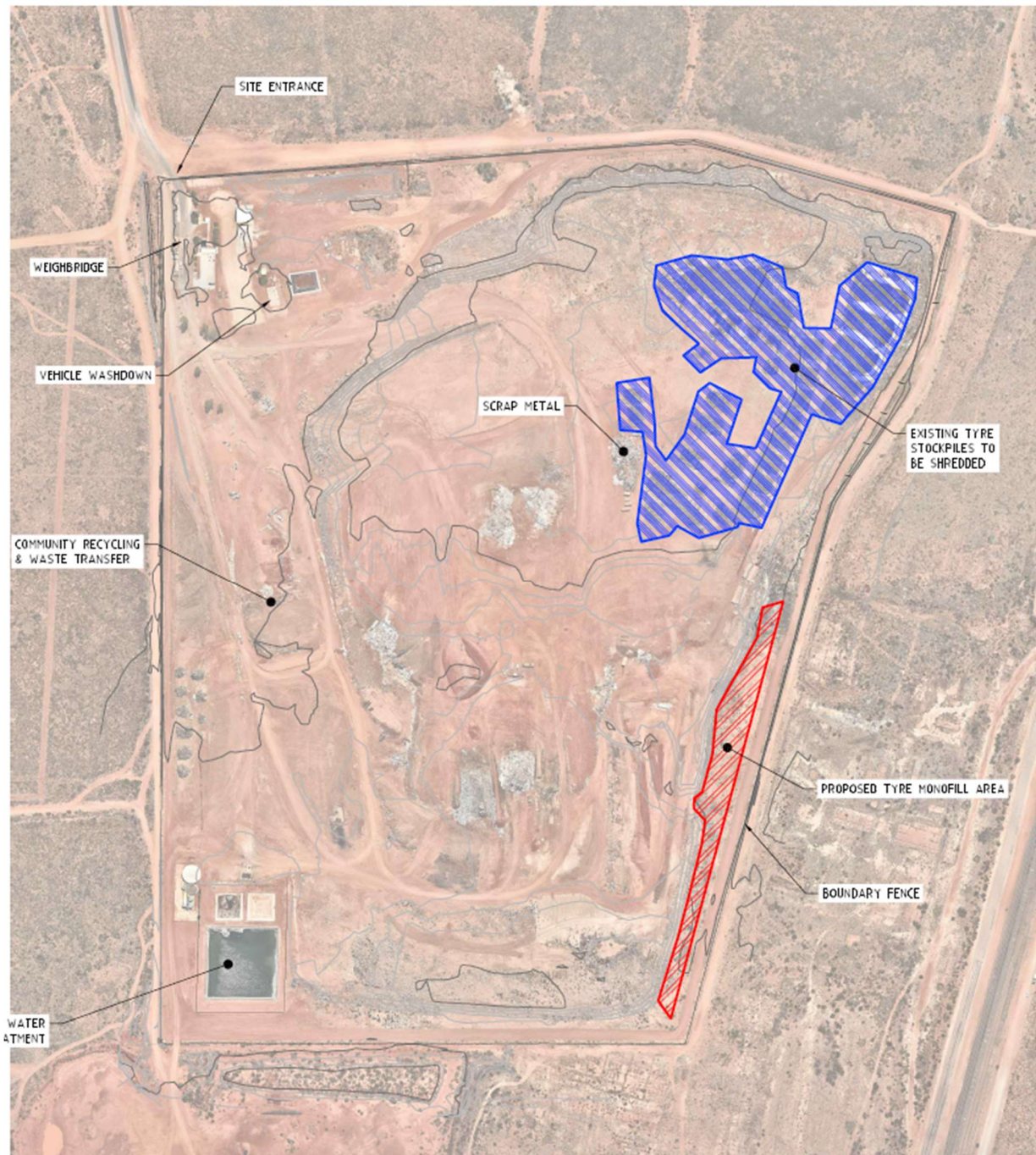
2. Condition 1.3.15 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:

1.3.15 The Licensee shall implement the following measures for managing the risk of fires:

- ~~(a) ensure that firefighting equipment stored onsite is capable of controlling and extinguishing a tyre fire;~~ ensure that firefighting equipment stored onsite is capable of managing a tyre fire until it is either extinguished, or capable of controlling the fire until further firefighting equipment/services can be brought onsite to assist with extinguishing the tyre fire;
- ~~(b) ensure that tyre stockpiles stacks do not obscure fire protection equipment (including fire hydrants and fire hoses) or any related signage; and~~
- ~~(c) maintain a firebreak of at least 3 meters around the boundary at the premises.~~

## Schedule 1: Maps

Figure 2: Plan of premises and location of tyre burial cell





## Schedule 3: Consequence and likelihood of risk events

A risk rating will be determined for risk events in accordance with the risk rating matrix set out in Table 7 below.

**Table 7: Risk rating matrix**

Likelihood	Consequence				
	Slight	Minor	Moderate	Major	Severe
Almost certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	High	Extreme
Possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Medium	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High

DWER will undertake an assessment of the consequence and likelihood of the Risk Event in accordance with Table 8 below.

**Table 8: Risk criteria table**

Likelihood		Consequence		
The following criteria has been used to determine the likelihood of the Risk Event occurring.		The following criteria has been used to determine the consequences of a Risk Event occurring:		
		Environment	Public health* and amenity (such as air and water quality, noise, and odour)	
Almost Certain	The risk event is expected to occur in most circumstances	Severe	<ul style="list-style-type: none"> <li>onsite impacts: catastrophic</li> <li>offsite impacts local scale: high level or above</li> <li>offsite impacts wider scale: mid-level or above</li> <li>Mid to long-term or permanent impact to an area of high conservation value or special significance<sup>^</sup></li> <li>Specific Consequence Criteria (for environment) are significantly exceeded</li> </ul>	<ul style="list-style-type: none"> <li>Loss of life</li> <li>Adverse health effects: high level or ongoing medical treatment</li> <li>Specific Consequence Criteria (for public health) are significantly exceeded</li> <li>Local scale impacts: permanent loss of amenity</li> </ul>
Likely	The risk event will probably occur in most circumstances	Major	<ul style="list-style-type: none"> <li>onsite impacts: high level</li> <li>offsite impacts local scale: mid-level</li> <li>offsite impacts wider scale: low level</li> <li>Short-term impact to an area of high conservation value or special significance<sup>^</sup></li> <li>Specific Consequence Criteria (for environment) are exceeded</li> </ul>	<ul style="list-style-type: none"> <li>Adverse health effects: mid-level or frequent medical treatment</li> <li>Specific Consequence Criteria (for public health) are exceeded</li> <li>Local scale impacts: high level impact to amenity</li> </ul>
Possible	The risk event could occur at some time	Moderate	<ul style="list-style-type: none"> <li>onsite impacts: mid-level</li> <li>offsite impacts local scale: low level</li> <li>offsite impacts wider scale: minimal</li> <li>Specific Consequence Criteria (for environment) are at risk of not being met</li> </ul>	<ul style="list-style-type: none"> <li>Adverse health effects: low level or occasional medical treatment</li> <li>Specific Consequence Criteria (for public health) are at risk of not being met</li> <li>Local scale impacts: mid-level impact to amenity</li> </ul>
Unlikely	The risk event will probably not occur in most circumstances	Minor	<ul style="list-style-type: none"> <li>onsite impacts: low level</li> <li>offsite impacts local scale: minimal</li> <li>offsite impacts wider scale: not detectable</li> <li>Specific Consequence Criteria (for environment) likely to be met</li> </ul>	<ul style="list-style-type: none"> <li>Specific Consequence Criteria (for public health) are likely to be met</li> <li>Local scale impacts: low level impact to amenity</li> </ul>
Rare	The risk event may only occur in exceptional circumstances	Slight	<ul style="list-style-type: none"> <li>onsite impact: minimal</li> <li>Specific Consequence Criteria (for environment) met</li> </ul>	<ul style="list-style-type: none"> <li>Local scale: minimal to amenity</li> <li>Specific Consequence Criteria (for public health) met</li> </ul>

<sup>^</sup> Determination of areas of high conservation value or special significance should be informed by the *Guidance Statement: Environmental Siting*.

\* In applying public health criteria, DWER may have regard to the Department of Health's *Health Risk Assessment (Scoping) Guidelines*.

"onsite" means within the Prescribed Premises boundary.

## Acceptability and treatment of Risk Event

DWER will determine the acceptability and treatment of Risk Events in accordance with the Risk treatment Table 9 below:

**Table 9: Risk treatment table**

<b>Rating of Risk Event</b>	<b>Acceptability</b>	<b>Treatment</b>
<b>Extreme</b>	Unacceptable.	Risk Event will not be tolerated. DWER may refuse application.
<b>High</b>	May be acceptable. Subject to multiple regulatory controls.	Risk Event may be tolerated and may be subject to multiple regulatory controls. This may include both outcome-based and management conditions.
<b>Medium</b>	Acceptable, generally subject to regulatory controls.	Risk Event is tolerable and is likely to be subject to some regulatory controls. A preference for outcome-based conditions where practical and appropriate will be applied.
<b>Low</b>	Acceptable, generally not controlled.	Risk Event is acceptable and will generally not be subject to regulatory controls.

## Appendix 1: Key documents

	Document title	Availability
1	Licence L6917/1997/8 – South Hedland Landfill	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
2	Department of Fire and Emergency Services (DFES) published Guidance Note GB02: <i>Bulk Storage of Rubber Tyres including Shredded and Crumbed Tyres</i> (DFES Tyre Guidelines), which is valid until November 2019.	accessed at <a href="http://www.dfes.wa.gov.au">www.dfes.wa.gov.au</a>
3	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
4	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	
5	DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	
6	DER, February 2017. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	
7	DER, February 2017. <i>Guidance Statement: Decision Making</i> . Department of Environment Regulation, Perth.	



## Appendix 2: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice on 21 August 2018. The Licence Holder responded on 22 August 2018. The following comments were received on the draft Amendment Notice:

Condition	Summary of Licence Holder comment	DWER response
1.3.14 (e)	In order to remain consistent with the terminology in other Licence conditions, the Licence Holder requested the following modification: “a minimum separation distance of 2.5m at the base must be maintained between <b>stockpiles</b> ;”	The Delegated Officer deems the suggested terminology appropriate and has amended the licence accordingly.
1.3.15 (b)	In order to remain consistent with the terminology in other Licence conditions, the Licence Holder requests the following modification: “ensure that tyre <b>stockpiles</b> do not obscure fire protection equipment (including fire hydrants and fire hoses) or any related signage; and”	The Delegated Officer deems the suggested terminology appropriate and has amended the conditions accordingly.