Government of Western Australia
Department of Environment Regulation

Amendment Notice 1

Licence Number	L8461/2010/2
Licence Holder	Daniels Health Services Pty Ltd
Registered business address	36 Cahill Street DANDENONG SOUTH VIC 3175
Date of amendment	Wednesday, 2 November 2016
Prescribed Premises	Category 61A: Solid waste facility. Category 62: Solid waste depot.
Premises	Daniels Health Services Pty Ltd Lot 164 on Plan 17339 Coolibah Way BIBRA LAKE WA 6163

Amendment

The Chief Executive Officer (CEO) of the Department of Environment Regulation (DER) has amended the above licence in accordance with section 59 of the *Environmental Protection Act 1986* as set out in this Amendment Notice.

Date signed: 2 November 2016

Alan Kietzmann

Manager Licensing (Waste Industries)

an officer delegated under section 20 of the Environmental Protection Act 1986 (WA)

Amendment Notice

This Notice is issued under 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.

Amendment Description

Daniels Health Services Pty Ltd (the Licence Holder) was granted a transferred licence (L8461/2010/2) on 30 March 2016. The premises accepts medical and clinical waste for autoclave treatment prior to off-site disposal, with a throughput of up to 5,000 tonnes per year.

The Amendment Notice is a result of a Licence Holder initiated amendment. On 27 September 2016, the Licence Holder submitted an amendment application to request that 500 tonnes/year of Genetically Modified Organisms (GMO), being mice carcasses, be included onto the licence as an authorised waste type. This will be an increase in the Solid Waste depot (category 62) 'approved premises production or design capacity' from 500 tonnes/annual period to 1,000 tonnes per annual/period.

The amendment application also requested changing of wording to Tables 1.2.1 and 1.2.2 of the Licence which relate to storage requirements, and the substitution of the 'Map of storage locations' in Schedule 1 of the Licence.

Location, environmental siting and potential receptors

Table 1 below lists the receptors in the vicinity of the Premises.

Table 1: Receptors and distance from prescribed activity

Residential and Sensitive Premises	Distance from prescribed activity
Residential area of Yangebup	Residential areas extends from the east to south of the Premises. The closest residence in this area is 450m south-east. Other residential areas such as South Lake and Spearwood are within 2km of the Premises and are located to the east, south and west of the Premises.
South Lake	830m north-east
Yangebup Lake	1.25km south-east
Little Rush Lake	1.07km east of Premises
Bibra Lake	1.6km north-east of Premises
Bush Forever area	430m north of Premises; 800m east of Premises (which extends to the south); and 1.5km north-east of the Premises.

Risk assessment

The Delegated Officer considers that the following proposed changes will not cause an increase in emissions and therefore these do not require a risk assessment:

- Change in the wording for Table 1.2.1 regarding solid waste from clinical facilities.
    - The change of wording broadens the description of facilities from where wastes can be received. The type and nature of waste will not change.
- Change in wording for Table 1.2.2 to allow for waste to be stored in sealed bags or sealed containers.
    - This change allows for different methods of storage but does not change the requirement that waste is sealed.
- Change in wording in Table 1.2.2 to remove requirement for cytotoxic and dry waste to be stored in a bunded area.
    - These wastes will be stored in a sealed bags and/or containers in a hardstand area or sea container. Given the dry nature of these wastes and the sealed storage requirements, the Delegated Officer considers it rare that any spills or leachate would be generated from these wastes and therefore the requirement to also be stored in a bund is not required.
- Change in wording in Table 1.2.2 regarding shredding of waste
    - The Licence Holder requested that this table be amended for clinical waste to remove the requirement to shred waste, stating that “not all clinical waste requires shredding”.
    - The Delegated Officer has amended Table 1.2.2 to reflect that some clinical wastes may require shredding and therefore now allows shredding to be undertaken if required.
    - This amendment does not alter the processes undertaken onsite.

Additional waste acceptance criteria and increase in premises capacity

The request to store an additional 500 tonnes/year of solid waste (GMO) is doubling the current authorised solid waste depot capacity. The Licence Holder proposes to store the GMO as per the current requirements for cytotoxic waste, prior to removal offsite for incineration. The current controls for cytotoxic waste require waste to be stored in sealed bags (the Licence Holder has requested this be expanded to include sealed containers), labelled, stored in a secure closable sea container, and stored within a bunded concrete hardstand (the Licence Holder has requested that the requirement for this area to be bunded is removed), and that this waste must be removed offsite within 60 days.

As per the Bureau of Meteorology’s Jandakot station data, prevailing wind direction in the morning is towards the east, with wind direction changing towards the west and south-west in the afternoon. The nearest odour sensitive receptors are located 450m from the site and are within the prevailing wind direction.

The Delegated Officers does not consider the increase in premises capacity to be a

concern in itself however the type of waste proposed to be stored has the potential to generate an increase in odour emissions which is discussed below.

Emission Description

Emission: Odour emissions generated from the storage of mice carcasses as they decompose, especially if stored onsite for extended periods.

Impact: Nuisance impacts on the comfort, amenity, health and wellbeing on sensitive receptors located 450m south of the site, especially wind directions is towards the east. Other residential communities located south and west of the site may also experience nuisance odour impacts when winds are in the direction of the residences.

Controls: The Licence Holder intends to store the GMO mice carcasses and other waste that may contain GMO waste, in the same manner as cytotoxic waste (described above) for up to 60 days in sealed bags or containers. Any of the GMO waste that contains organic material will also be stored in refrigeration units prior to transport offsite.

Risk Assessment (when waste refrigerated)

Consequence: Moderate
Likelihood: Unlikely
Risk Rating: Moderate

Regulatory Controls

Given the moderate risk for odour emission when the GMO waste is refrigerated, the Delegated Officer has included additional controls in Table 1.2.2 to manage the risk of odour emissions. Table 1.2.2 requires refrigeration of this waste at all times and in the event that the integrity/function of the refrigeration unit it compromised, such as in the event of power outages, the waste must be removed offsite within 24 hours of the event occurring. Table 1.2.1 has been amended to authorise GMO waste to be accepted however it limits the waste received to mice carcasses and that no more than 500 tonnes/year is to be accepted, as requested by the Licence Holder.

Decision

The Delegated Officer has determined that based on the risk assessment, an amendment is to be made to authorise GMO as a waste stream and increase solid waste storage throughput by 500 tonnes/annual period. Consequently, the waste acceptance criteria and waste processing (Tables 1.2.1 and 1.2.2) requirements have been amended, and replace the 'map of storage locations' in Schedule 1 with a new map.

In granting this amendment the Delegated Officer has considered the following DER guidance statements:

- *Setting Conditions Division 3, Part V, Environmental Protection Act 1986, October 2015*

- *Licensing and works approvals process Part V Environmental Protection Act 1986, September 2015.*

Amendment History

Instrument	Issued	Amendment
L8461/2010/2	30/03/2016	Transfer of licence occupier
L8461/2010/2	2/11/2016	Amendment Notice 1: Inclusion of GMO waste acceptance and increase in Premises capacity

Amendments

1. The licence Prescribed premises category table on page one is amended by the by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:

Category number	*Category description*	*Category production or design capacity*	*Approved Premises production or design capacity*
61A	*Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.*	*1,000 tonnes or more per year*	*5,000 tonnes per annual period*
62	*Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use.*	*500 tonnes or more per year*	*~~500~~ 1,000 tonnes per annual period*

2. *The Interpretation section of the licence is amended by the insertion of the red text shown in underline below*

   ***'GMO'** means Genetically Modified Organisms*

3. Table 1.2.1 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:

Table 1.2.1: Waste acceptance		
Waste type	***Quantity limit***	***Specification[1]***
Cytotoxic, Clinical & Pharmaceutical waste (for storage prior to removal off-site for incineration)	*500 tonnes per annual period*	*Solid waste received from ~~hospitals and medical facilities~~ clinical and related waste generators.* *This includes:* • *sharps and sharps containers, packaging and surgical instruments/equipment used during the collection/analysis/disposal of clinical waste and contaminated with cytotoxic waste;* • *recognisable anatomical body parts;* • *research animals;* • *microbiological cultures from laboratory waste;* • *human tissue and blood/body fluids;*

Table 1.2.1: Waste acceptance		
Waste type	**Quantity limit**	**Specification[1]**
		and • *by products of cytotoxic drug therapy.* *This does not include:* • *corpses*
GMO waste	*500 tonnes per annual period*	*Solid waste that contains or is associated with GMO waste*
Clinical waste (for sterilisation prior to removal offsite for landfilling)	*5,000 tonnes per annual period*	*Solid waste received from ~~hospitals and medical facilities~~ clinical and related waste generators.* *This includes:* • *sharps and sharps containers;* • *packaging and surgical instruments/equipment used during the collection/analysis/disposal of clinical waste;* • *body piercing equipment/waste; and* • *acupuncture waste.*

4. Table 1.2.2 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:

Table 1.2.2: Waste processing		
Waste type	**Process**	**Process limits**
Clinical and wet Pharmaceutical waste (for storage prior to removal offsite for incineration)	*Receipt, handling and storage prior to transport offsite for incineration.*	*Autoclaving of this waste on the Premises is not permitted.* *Waste must be removed from the premises within 60 days of arriving at the premises.* *This waste is to be stored* • *Within sealed bags or sealed containers;* • *Only within the storage area depicted 'S1' in Schedule 1;* • *Within a bunded concrete hardstand area* • *In a secure, refrigerated container at all times;* • *Stored at a temperature of 4 degrees Celsius or less; and* • *Within the appropriately labelled bin or container for that waste type.* *Waste must not be stored with autoclave and shredding waste.*
Cytotoxic and dry pharmaceutical wastes (for storage prior to	*Receipt, handling and storage prior to transport offsite for incineration.*	*Autoclaving of this waste on the Premises is not permitted.* *Waste must be removed from the premises within 60 days of arriving at the premises.*

Table 1.2.2: Waste processing		
Waste type	**Process**	**Process limits**
removal offsite for incineration)		*This waste is to be stored* • *Within sealed bags or sealed containers;* • *Within the appropriately labelled bin or container for that waste type.* • *Within a secure, closable sea container,* • *Within a ~~bunded~~ concrete hardstand area* *Waste must not be stored with autoclave and shredding waste.*
Clinical waste (for sterilisation prior to removal offsite for landfilling)	*Receipt, handling and storage. Autoclaving and shredding (if required) prior to disposal offsite.*	*Maximum of 5,000 tonnes throughput per year.* *Waste must be autoclaved within 7 days of arriving at the premises.* *This waste is to be stored:* • *Within the secure and enclosed building on the premises;* • *Within a bunded or contained concrete hardstand area;* • *Within the appropriately labelled bin for that waste type, prior to autoclaving; and* • *for up to 7 seven days within the unrefrigerated untreated autoclave waste storage area, after which time it must be autoclaved.* *Waste shredding may only occur after autoclaving.* *Waste must not be stored with waste destined for incineration off site.*
GMO waste (for storage prior to removal offsite for incineration)	*Receipt, handling and storage prior to transport offsite for incineration.*	*Autoclaving and shredding of this waste on the Premises is not permitted.* *Waste must be removed from the premises within 60 days of arriving at the premises.* *This waste is to be stored* • *Within sealed bags or sealed containers; and* • *If waste contains organic material, stored at a temperature of 4 degrees Celsius or less.* *In the event that the refrigeration unit ceases to function in working order, the waste must be removed offsite within 24 hours.* *Waste must not be stored with autoclave and shredding waste.*

5. The ‘Map of storage locations’ in Schedule 1 is amended with the following image: