



Licence Holder Veolia Environmental Services (Australia) Pty Ltd

ACN 051 316 584

Licence Number L8765/2013/1

File Number: 2013/003439

Premises North West Waste Alliance Waste Handling and
Transfer Station

Lot 2864 Pyramid Road
KARRATHA INDUSTRIAL ESTATE WA 6714
Being Lot 2864 on Plan 184127

Date of amendment 1 May 2017

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. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act and follows.

Date signed: 1 May 2017

Steve Checker
Manager Licensing (Waste Industries)

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

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.

The following DER 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* (October 2015)
- *Guidance Statement: Licence Duration* (November 2015)
- *Guidance Statement: Decision Making* (February 2017)
- *Guidance Statement: Risk Assessment* (February 2017)
- *Guidance Statement: Environmental Siting* (November 2016)

Amendment Description

Veolia Environmental Services (Australia) Pty Ltd (Veolia) applied to amend Licence L8765/2013/1. The amendment is in response to the Premises being inspected on 12 October 2016 by DER. DER Officers noted the Licensee accepting glycol and fire extinguishers, which is in contradiction to Condition 1.3.2 which states '*Only waste types specified in Schedule 2 may be accepted*'. Veolia have applied to accept the following wastes streams as part of this amendment application:

- Fire extinguishers;
- Brine;
- Glycol; and
- Mercury sludge

DER has also taken this opportunity to make administrative changes to the Condition 1.3.2 in accordance with the guidance statement *Setting Conditions* (October 2015). The proposed amendment of the Licence L6853/1997/14 is made by the Delegated Officer pursuant to section 59(1) (a) of the EP Act. Table 1 below outlines the proposed changes to the licence

Table 1: Proposed changes requested in amendment

Category	Current Design Capacity	Proposed Capacity	Description of proposed amendment
61	20,000 tonnes per annual period	20,000 tonnes per annual period	Brine (99.5 tonnes per annual period); and Glycol (200 tonnes per annual period).
61A	13,000 tonnes per annual period	13,000 tonnes per annual period	Fire extinguishers (0.7 tonnes per annual period); Mercury sludge (0.2 tonnes per annual period).

Location, environmental siting and potential receptors

The nearest watercourse (un-named) is a tributary of the Nickol River running 170 metres (m) to the north-east of the site entrance. There is no formal below ground stormwater collection system at the premises. All surface water flows into surface drains and then under Anderson road and into the adjacent creek. This is in the general direction of the nearest watercourse - a tributary of the Nickol River running 170m to the north east of the site. Groundwater is located at 6.5 metres below ground level (mbgl).

The premises zoned as 'Industry' by the City of Karratha. The premises is bounded by similar industrial sites to the north, west and south. An area of Unallocated Crown Land (UCL) is located immediately east. The City of Karratha have zoned the UCL as 'Conservation Recreation and Natural Landscapes'. The nearest sensitive receptor to the Premises is an accommodation village located 1.4km to the North West.

Risk assessment

Table 2 below describe the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. Both tables identify whether the emissions present a material risk to human health or the environment, requiring regulatory controls.

Table 2: Risk assessment for proposed amendments during operation

Source/Activities		Risk Event				Consequence rating	Likelihood rating	Risk	Reasoning
		Potential Emissions	Potential Receptors	Potential Pathway	Potential Adverse Impacts				
Category 61 Liquid waste facility	Receipt, handling and storage prior to disposal	<i>[Dust: associated with [ore handling]</i>	<i>[e.g. residence XXXm north of the Premises]</i>	<i>Air: []</i>	<i>Health and amenity impacts</i>	<i>Severe / Major / Moderate / Minor / Slight</i>	<i>Almost Certain / Likely / Possible / Unlikely / Rare</i>	<i>High / Medium / Low</i>	<i>Describe any other considerations of the Delegated Officer in arriving at the risk assessment.</i>
		Waste: Unauthorised discharge of brine and glycol	Groundwater Local soils within the Premises	Land and groundwater – <i>direct infiltration into soil and groundwater</i>	Alteration to soil and groundwater with excess metals and nutrients.	Slight	<i>Unlikely</i>	Low	Groundwater is located at 6.5 mbgl. There are no known groundwater uses in the Karratha area. Brine will be transported onto site in bulk containers or IBC's. Brine in bulk containers will be pumped into ISO containers in a bunded area to contain any spills. Glycol will be transported onto site in Bulk containers or IBC's. Glycol in bulk containers will be pumped into ISO containers in a bunded area to contain ant spills. Licence condition 1.2.2 regulates waste processing activities and requires hazardous waste to be stored and sorted in designated bins or bunded areas prior to transport offsite The Delegated Officer does not consider additional regulatory controls are required given the licence amendment application risk assessment.

Category 61 A Solid waste facility	<i>Receipt, handling and storage prior to disposal</i>	Waste: Unauthorised discharge of Mercury sludge	Groundwater Local soils within the Premises	Land and groundwater – direct infiltration into soil and groundwater	<i>Alteration to soil and groundwater with excess metals</i>	<i>Slight</i>	<i>Unlikely</i>	<i>Low</i>	Groundwater is located at 6.5 mbgl. There are no known groundwater uses in the Karratha area. Mercury sludge will be transported as packaged waste and will not be consolidated on site. Mercury sludge will be stored in a hardstand bunded area of the Premises until transferred to a waste disposal facility that can accept mercury sludge.
		Waste: Discharge of firefighting gas into the atmosphere	Adjacent industrial premises and accommodation village	Air	<i>Health and amenity impacts</i>	<i>Minor</i>	<i>Unlikely</i>	<i>Medium</i>	The premises is bounded by similar industrial sites to the north, west and south. The nearest sensitive receptor to the Premises is an accommodation village located 1.4km to the north west. Fire extinguishers will be transported to the Premises a packaged waste. Fire extinguishers will be degassed into plastic 44 gallon drums. Openings to the drums will be covered with black plastic prior to discharge. The fire extinguishers are then drilled through the bottom and sent for disposal to metal recyclers. The dry powder will be consolidated into plastic 44 gallon drums through a small 2 inch opening on top of the drum. On completion, the drum will be sealed with the screw in bung. It will then be transported to a waste disposal site.

Decision

The Delegated Officer has considered DER's *Guidance Statement: Regulatory Principles*, *Guidance Statement: Setting Conditions* and *Guidance Statement: Risk Assessment* in granting this amendment, and does not consider that this amendment will impact the risk profile of the premises, which is currently considered as Low.

Licence condition 1.2.2 regulates waste processing activities and requires hazardous waste to be stored and sorted in designated bins or banded areas prior to transport offsite. The Delegated Officer has included proponent commitments regarding the handling of storage of mercuric waste as controls on the licence and does not consider additional regulatory controls are required given the risk assessment in Table 2 above. Veolia will only be licensed to accept 0.2 tonnes of mercury sludge each annual period.

Amendment History

Instrument	Issued	Amendment
L8765/2013/1	29/4/2016	Licence amendment for the extension of the Licence duration to 22 September 2026
L8765/2013/1	1/5/2017	Licence amendment for acceptance of fire extinguishers, brine, glycol and mercury sludge

Licence Holder's Comments

The Licence Holder was provided with the draft Amendment Notice on 9 March 2017. Comments received from the Licence Holder have been considered by the Delegated Officer as shown in Appendix 2.

Amendment

1. Condition 1.3.2 of the Licence is amended by the insertion of the red text shown in underline below:

- 1.3.2 *The Licensee shall only allow waste to be accepted on to the Premises if:*
- (a) *it is of a type listed in Table 1.3.1;*
 - (b) *the quantity accepted is below any limit listed in Table 1.3.1; and*
 - (c) *it meets any specification listed in Table 1.3.1 and listed in Schedule 2.*

Waste	Waste Code	Quantity Limit	Specification ¹
<i>Inert Waste Type 1</i>	<i>N/A</i>	<i>Combined total of no more than 13 000 tonnes per annual period</i>	<i>Fire fighting foam shall be received, stored and removed to an appropriately licensed facility.</i>
<i>Inert Waste Type 2</i>	<i>N/A</i>		
<i>Putrescible Waste</i>	<i>N/A</i>		<i>Radioactive waste shall not be accepted</i>
<i>Special Waste Type 2</i>	<i>R100, R120, R140</i>		

Table 1.3.1: Waste acceptance			
Solid Hazardous Waste	B100, <u>D120</u> D220, D221, N100 N160		Only waste types specified in Schedule 2 may be accepted ²
Liquid Hazardous Waste	J100, J120 J130, J170, J180, N205		<u>Mercury waste shall:</u> <ul style="list-style-type: none"> <u>be accepted onto the Premises as packaged waste;</u> <u>shall not be consolidated or mixed at the Premises;</u> <u>shall be stored in a hardstand bunded area on the Premises.</u>
Liquid Waste	K110, K200 K210, L100, L150, <u>M130</u>	Combined total of no more than 20 000 tonnes per annual period	Only waste types specified in in Schedule 2 may be accepted ²

Note 1: Additional requirements for the acceptance of controlled waste are set out in the Environmental Protection (Controlled Waste) Regulations 2004.

Note 2: Waste streams are variable for the site, however quantity limits for waste acceptance overall must not exceed the Approved Premises production or design capacity stated on page 1 of this Licence.

2. Schedule 2 of the Licence is amended by the insertion of the red text shown in underline below:

Schedule 2: Accepted waste types

The waste types that can be accepted in accordance with condition 1.3.1 are listed in `Table 1 below.

Table 1: Waste types and quantities	
Material Type	Maximum quantity (tonnes per annual period)
Solid materials	
Activated carbon	100
Aerosol cans	3
Air filters	100
Aluminium	30
Barite (drilling mud additive)	3
Batteries - alkaline	3
Batteries – lead acid	130
Batteries – lithium	2
Batteries – nickel cadmium/nickel metal hydride	3
Bentonite (clay)	5
Cement	200
Chemical sacks	5
Chemical waste	100
Contaminated sand	300
E-Waste	20
Fluorescent tubes & lamps	10
Garnet	200
Gas cylinders	30
Glass	50
Contaminated/used protective clothing	5

Grease	5
Uncontaminated lagging/Insulation	300
Special Waste Type 2	5
Mercury filters	3
Metal drums/containers	300
Mixed plastics	200
Molecular sieve	3
Oil, glycol & condensate filters	20
Oily absorbents	300
Paint waste solid	5
Paper/cardboard	500
Plastic drum/container	1000
Printer & fax toner cartridges	5
Scrap steel	5 000
Thread protectors	30
Wood	1 000
<u>Fire extinguishers</u>	<u>0.7</u>
<u>Mercury sludge</u>	<u>0.2</u>
Liquid materials	
AMDEA (solvent CO ₂ removal)	100
Chemical Waste	500
Degreasers	100
Diesel	30
Drill mud	500
Flammable liquids & sludges	300
Fire fighting foam	10
Grease trap waste	100
Hydrocarbon sludge	200
Industrial wash waters	120
Oily water	3 000
Paint and thinners	20
Septage waste (including wastewater)	6 000
Vegetable oil	30
Waste oil	1 000
<u>Brine</u>	<u>99.5</u>
<u>Glycol</u>	<u>200</u>

Appendix 1: Key Documents

	Document Title	In text ref	Availability
1	Licence L8765/2013/1 – North West Waste Alliance Waste Handling and Transfer Station	L8765/2013/1	accessed at http://www.der.wa.gov.au

Appendix 2: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice on 17 March 2017 for review and comment. The Licence Holder signed the waiver form on 24 April 2017 accepting the amendments and requesting the Amendment Notice be issued as soon as possible.

Comments received	DER consideration of risk
N/A	N/A