

19<sup>th</sup> November 2024

Department of Water and Environment Regulation  
Locked Bag 10  
Joondalup DC WA 6919

### **Attachment 3B - Additional Information**

Dear DWER,

We are requesting the following amendment to licence **L8417/2012/2** to increase our throughput from 80,000 tonnes per annual period to 150,000 tonnes per annual period.

We provide the following information to assist in this amendment:

**1.) Increase throughput for Category 62 from 80,000 tonnes to 150,000 tonnes per annual period.**

- Current Throughput: 80,000 tpa
- New Throughput: 150,000 tpa
- Actual production capacity of our facility: 1,000 tonnes per day (250,000 tpa)
- No new machinery is required to help cope with the increase in throughput. We have existing recycling plant (installed 2017) with a design capability of over 1000 tonnes per day.
- Other notable upgrades: We have put on more pickers and transfer trucks to take material out of the facility.
- We have not identified any issues that may impact our ability to cope with the increased capacity.
- The main reason for increase in throughput: There has been a steady increase in construction waste as a result from covid. More customers and contracts. Overall increase in economic activity.
- Hours of operation will remain the same
- Staff hired: We have 12-13 staff at our facility.

**2.) Amend wording in Table 3.**

Further to this, we have noticed that the conversion used in **Table 3: Monitoring of inputs and outputs** of 1.3 tonnes in every m<sup>3</sup> is incorrect and inconsistent with the default bulk density conversion table which specifies conversion factors for each type of waste applicable. The current overarching factor is considerably higher than the default amounts for waste types such as inert, putrescible, greenwaste and asbestos waste.

We would ask that the wording "*OR m<sup>3</sup> and calculated tonnes – a conversion factor of 1.3 tonnes in every m<sup>3</sup> must be used to calculate tonnage*" be amended/deleted to refer to a more appropriate conversion factor to be used instead.

**3.) Change annual period to be inline with financial year calendar.**

We would like to change our current annual period from 6<sup>th</sup> December to the 5<sup>th</sup> of December of the following year, to state **1<sup>st</sup> July to 30<sup>th</sup> of June**.

This will ensure we are able to keep all waste reporting consistent with the Waste Data Online Reporting period and allows us to prepare and submit one set of data for both.

Please let me know if you require any further information. Feel free to call or email me to discuss further and if upon review there are any other amendments that would be beneficial for the efficiency of our licence conditions.

Kind Regards,

