



## Application for Licence Amendment

### Part V Division 3 of the *Environmental Protection Act 1986*

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| <b>Licence Number</b>    | L9066/2017/1                                                                                                                                                                                                                                                                                                     |
| <b>Licence Holder</b>    | SUEZ Recycling & Recovery Pty Ltd                                                                                                                                                                                                                                                                                |
| <b>ACN</b>               | 002 902 650                                                                                                                                                                                                                                                                                                      |
| <b>File Number</b>       | DER2017/000998-1                                                                                                                                                                                                                                                                                                 |
| <b>Premises</b>          | SUEZ Picton Resource Recovery Centre<br>21 Giorgi Road PICTON WA 6229<br><br>Legal description –<br>Part of Lot 101 on Deposited Plan 29618<br>Certificate of Title Volume 2503 Folio 671<br><br>As defined by the Premises map in Schedule 1 of the licence<br>and the coordinates in Schedule 2 of the licence |
| <b>Date of Report</b>    | 24/01/2022                                                                                                                                                                                                                                                                                                       |
| <b>Proposed Decision</b> | Revised licence granted                                                                                                                                                                                                                                                                                          |

**MANAGER WASTE INDUSTRIES  
REGULATORY SERVICES**

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

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## 1. Decision summary

Licence L9066/2017/1 is held by SUEZ Recycling & Recovery Pty Ltd (Licence Holder) for the SUEZ Picton Resource Recovery Centre (the premises), located at 21 Giorgi Road, Picton, WA 6229.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the premises. As a result of this assessment, Revised Licence L9066/2017/1 has been granted.

The Revised Licence issued as a result of this amendment supersedes the existing Licence previously granted in relation to the premises.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

### 2.2 Amendment summary

On 7 October 2021, the Licence Holder submitted an application to the department to amend Licence L9066/2017/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Addition of hand-sorting, to remove non-conforming waste types, to the authorised waste processes for putrescible waste.
- Installation of baling equipment to undertake baling operations of the paper and cardboard wastes currently received at premises.

This amendment is limited only to changes to Category 62 activities from the Existing Licence. No changes to waste type or throughputs have been proposed by the applicant.

Table 1 below outlines the proposed changes to the existing Licence.

**Table 1: Proposed throughput changes**

| Category | Current throughput capacity           | Proposed throughput capacity | Description of proposed amendment                                  |
|----------|---------------------------------------|------------------------------|--------------------------------------------------------------------|
| 62       | 45,000 tonnes per annual period (tpa) | 45,000 tpa                   | Installation of baling equipment and addition of hand-sorting only |

Figure 1 below depicts the general layout of infrastructure and activity areas at the premises.

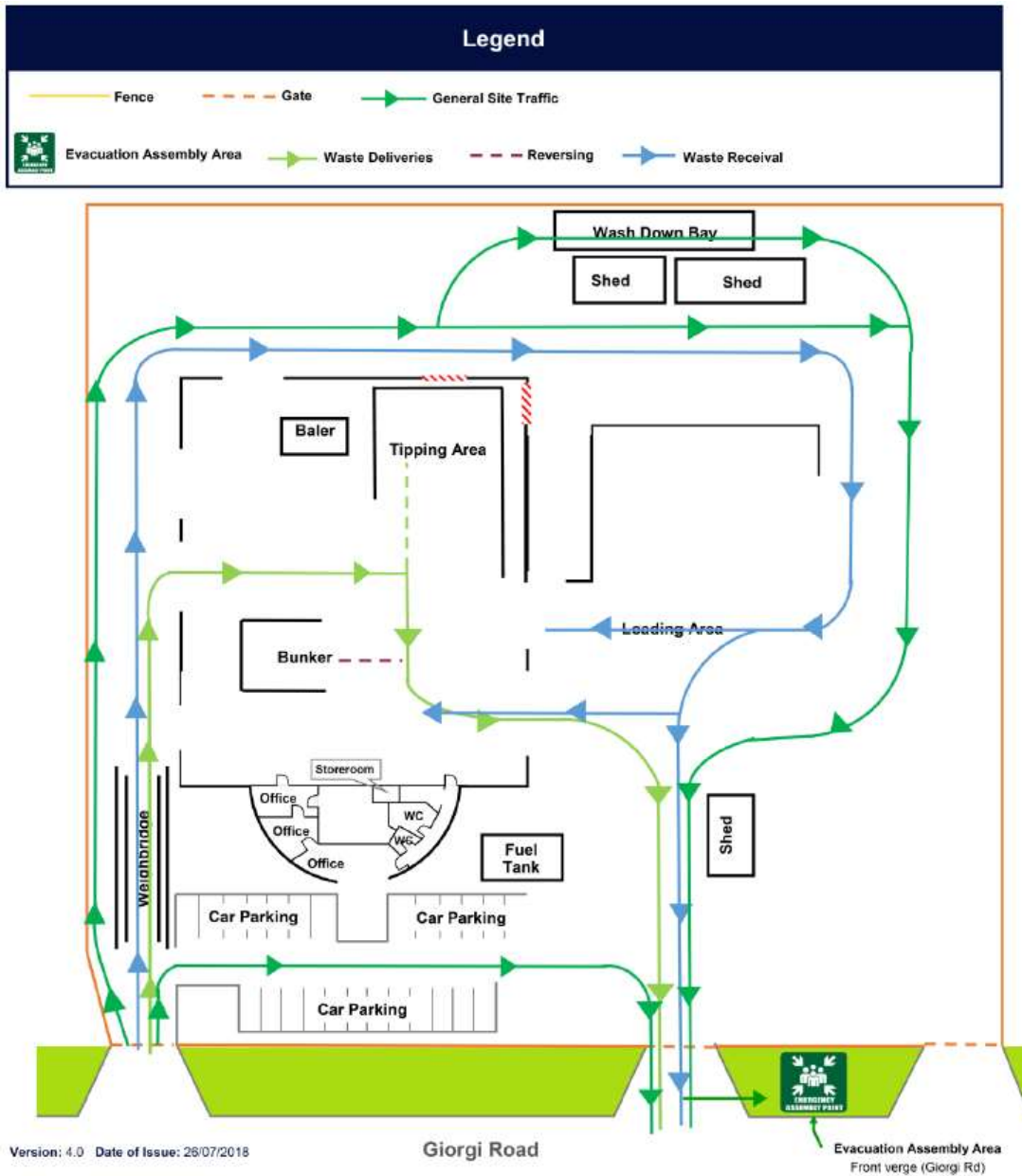


Figure 1: Site layout

### 3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

#### 3.1 Source-pathways and receptors

##### 3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

**Table 2: Licence Holder controls**

| Emission                          | Sources                                                             | Potential pathways               | Proposed controls                                                                                                                                                                                                                                                            |
|-----------------------------------|---------------------------------------------------------------------|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Windblown waste                   | Unloading, loading, hand-sorting, baling and storage of solid waste | Air/windborne pathway            | Perimeter fencing around premises boundary.<br>Regular litter collection.<br>Enclosed storage/handling facilities.<br>Expedited transfer of stored wastes.                                                                                                                   |
| Smoke/toxic fumes from waste fire | Storage of baled paper and cardboard                                | Air/windborne pathway            | Never using baled combustible material to clean floors to prevent sparks.<br>Flammable baled materials are to be stacked in a pyramid/off-set manner.<br>Limiting the quantity of stored, baled material before loading out for off-site disposal to 175 tonnes at one time. |
| Firefighting wash-water           |                                                                     | Overland runoff and infiltration |                                                                                                                                                                                                                                                                              |
| Noise                             | Baling of paper and cardboard                                       | Air/windborne pathway            | Baler to be located within the storage shed on-site.                                                                                                                                                                                                                         |

### 3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

**Table 3: Sensitive human and environmental receptors and distance from prescribed activity**

| Human receptors                  | Distance from prescribed activity                                       |
|----------------------------------|-------------------------------------------------------------------------|
| Residential Premises             | 1200m to north-west of premises boundary (Figure 2)                     |
| Caravan Park                     | 1250m east of premises boundary (Figure 2)                              |
| Commercial/Light Industrial area | Immediately adjacent to the south, south-west and south-east (Figure 2) |

| Environmental receptors                                                          | Distance from prescribed activity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Geomorphic Wetlands                                                              | <p>A multiple use status sumpland underlies the premises (light blue polygon, Figure 2)</p> <p>A conservation status dampland is located 60m north-east of the premises (dark green polygon, Figure 2)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Threatened Ecological Communities and Priority Ecological Communities (TEC/PECs) | Priority 3 and endangered Banksia woodland community (14849) located to the north of the premises                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Major watercourses/waterbodies                                                   | East Picton main drain 850m south of premises boundary (Figure 2) and Ferguson River 1500m south of premises boundary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Groundwater                                                                      | <p>Depth to groundwater in the superficial aquifer at the premises is unknown but is expected to be very shallow given the premises is sited within an area mapped as sumpland and in close proximity to a nearby dampland. Superficial groundwater flow direction at the premises is unknown.</p> <p>Depth to groundwater on an adjacent premises was measured in 2005 and was recorded as about 3.7m below ground level (BGL). This monitoring bore is recorded in the Water Information Reporting database (site ID 61100241) and is 40 m south-west of the premises boundary.</p> <p>The premises is within the Bunbury Groundwater Area which is a proclaimed groundwater area under the <i>Rights in Water and Irrigation Act 1914</i>.</p> <p>There is one site with a licence to take groundwater from the superficial aquifer within 1.5 km of the premises. This licence is held by the Dardanup Butchering Company located 850m west of the premises where groundwater is used for abattoir purposes.</p> |
| Public Drinking Water Source Areas (PDWSAs)                                      | The Picton Water Reserve is a Priority 1 PDWSA located 715 m north of the premises. Groundwater in this PDWSA is currently drawn from the Yarragadee South aquifer which is deep and locally confined with negligible risk from contaminating activities at the surface (Department of Water 2011).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

Figure 2 below depicts distance to sensitive and environmental receptors.



**Figure 2: Distance to sensitive and environmental receptors**

Blue areas indicate multiple use geomorphic wetlands and dark green areas represent conservation geomorphic wetlands. TEC/PECs are not shown.



## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The Revised Licence L9066/2017/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Category 62 activities.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).



**Table 4: Risk assessment of potential emissions and discharges from the premises operation**

| Risk events                                                         |                                     |                                                                                         |                                                                                                                                                   |                      | Risk rating <sup>1</sup><br>C = consequence<br>L = likelihood | Applicant controls sufficient? | Conditions <sup>2</sup> of licence            | Justification for additional regulatory controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------------------------------------|-------------------------------------|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------|--------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sources / activities                                                | Potential emission                  | Potential pathways and impact                                                           | Receptors                                                                                                                                         | Applicant controls   |                                                               |                                |                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Operation</b>                                                    |                                     |                                                                                         |                                                                                                                                                   |                      |                                                               |                                |                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Baling of paper and cardboard                                       | Noise                               | Air / windborne pathway causing impacts to health and amenity                           | Residential premises located 1200m north-west and caravan park 1250m east<br><br>Adjacent industrial premises                                     | Refer to Section 3.1 | C = Minor<br>L = Rare<br><b>Low Risk</b>                      | Y                              | Condition 4                                   | Noise emissions are adequately regulated by the <i>Environmental (Noise) Protection Regulations 1997</i> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Unloading, loading, hand-sorting, baling and storage of solid waste | Windblown waste                     | Air / windborne pathway causing impacts to amenity<br><br>Adverse impacts to ecosystems | Adjacent industrial premises<br><br>Fauna of the Banksia woodland TEC to the north<br><br>Fauna in the conservation status wetland 60m north-east | Refer to Section 3.1 | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>            | Y                              | Conditions 4 and 5                            | The existing Licence specifies that all reasonable and practical measures are implemented to ensure no windblown litter escapes the premises but does not specify what specific measures are required or at what frequency they occur.<br><br>The Delegated Officer considers that the following specific and enforceable measures are required to mitigate risks to off-site receptors: <ul style="list-style-type: none"> <li>• Windblown waste on the premises and along the premises boundary fence line should be collected at least once per week.</li> <li>• The perimeter fence should be maintained in good condition to minimise windblown waste crossing the premises boundary.</li> </ul> |
| Storage of baled paper and cardboard                                | Smoke / toxic fumes from waste fire | Air / windborne pathway causing impacts to health and amenity                           | Adjacent industrial premises<br><br>Residential premises located 1200m north-west and caravan park 1250 m east                                    | Refer to Section 3.1 | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>            | N                              | <b><u>Conditions 3, 4, 6, 7, 8 and 13</u></b> | The potential fire size correlates with the quantity of combustible materials stockpiled on-site and the site layout. Baling combustible materials may reduce the likelihood of a fire starting in the waste, but once established fires in bales are harder to extinguish because the fuel is more concentrated (EPA Victoria 2021).<br><br>Implementation of appropriate measures to prevent the ignition and spread of fires, fire response procedures and firefighting equipment are important controls to reduce the likelihood and impact from fires.                                                                                                                                           |

| Risk events          |                                                                                   |                                                                                         |                                                                                                                                                                                                           |                      | Risk rating <sup>1</sup><br>C = consequence<br>L = likelihood | Applicant controls sufficient? | Conditions <sup>2</sup> of licence            | Justification for additional regulatory controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------|--------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sources / activities | Potential emission                                                                | Potential pathways and impact                                                           | Receptors                                                                                                                                                                                                 | Applicant controls   |                                                               |                                |                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                      | Contaminated firefighting wash-water generated from extinguishing of a waste fire | Overland runoff and infiltration potentially causing soil and groundwater contamination | Down-gradient shallow groundwater users<br><br>Down-gradient groundwater dependent ecosystems, potentially including the Banksia woodland TEC to the north and conservation status wetland 60m north-east | Refer to Section 3.1 | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>            | N                              | <b><u>Conditions 3, 4, 6, 7, 8 and 13</u></b> | <p>The controls proposed by the Licence Holder are suitable and have been included as controls in the Revised Licence. The Delegated Officer considers that the following additional controls are required to prevent and mitigate impacts from a potential fire incident at the premises:</p> <ul style="list-style-type: none"> <li>• Requirement to prepare, maintain, implement and submit a Fire and Emergency Management Plan.</li> <li>• Requirement to ensure firefighting equipment/ systems are in good working order and capable of controlling a loose or baled material fire.</li> <li>• General requirements in the event of a fire, including extinguishing the fire as soon as possible and collection and appropriate disposal of fire wash-water and other wastes.</li> <li>• Specification of maximum dimensions and minimum separation distances for stockpiles of baled paper and cardboard. These controls are intended to limit the potential size and spread of a stockpile fire and are derived from controls outlined in the <i>Guidance Note: GN02 Fire Prevention and Management in a Recycling Facility</i> (DFES 2020) and <i>Management and storage of combustible recyclable and waste materials – guideline</i> (EPA Victoria 2021).</li> <li>• Specification of minimum separation distance of 6m between the baler and stockpiled combustible materials, to reduce the risk of ignition from this source.</li> <li>• Specification of security requirements relating to the perimeter fence and entrance gates.</li> <li>• Notification requirements for fire incidents, to keep the department informed of any incidents that occur.</li> </ul> |

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

## 4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

**Table 5: Consultation**

| Consultation method                                            | Comments received   | Department response |
|----------------------------------------------------------------|---------------------|---------------------|
| Licence Holder was provided with draft amendment on 17/01/2022 | Refer to Appendix 1 | Refer to Appendix 1 |

## 5. Conclusion

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

### 5.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Licence as part of the amendment process.

**Table 6: Summary of licence amendments**

| Condition no.                                        | Proposed amendments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Legal description of premises boundary               | Addition of reference to coordinates in Schedule 2 for consistency with the current regulatory approach for premises occupying part of a cadastral lot.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Cover page                                           | Category 62 description and assessed design capacity moved from Schedule 2 to the cover page of the Licence for consistency with the current regulatory approach.<br>Correction of a typographical error in the stated assessed design capacity of '45,000 tonnes per day' to '45,000 tonnes per annual period'.                                                                                                                                                                                                                                                                                                                                                                           |
| Explanatory notes                                    | Removed for consistency with the current regulatory approach. This guidance is available in the department's <i>Guideline: Industry Regulation Guide to Licensing</i> (DWER 2019).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Licence history                                      | Added for consistency with current regulatory approach.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Interpretation                                       | Moved to precede the conditions and updated based on departmental legal advice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| N/A                                                  | References to 'shall' changed to 'must' to align with current regulatory approach.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Former condition 1 – Emissions                       | Removed. This condition is considered to unnecessarily duplicate legislation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2; Table 1 – Waste acceptance (formerly condition 2) | Updated wording of condition and table headings to align with current regulatory approach.<br>Inert Waste Type 1 removed from the accepted waste types because none of the wastes accepted by the Licence Holder are captured under this waste type as it is defined in the <i>Landfill Waste Classification and Waste Definitions 1996</i> (Landfill Definitions) (DWER 2019). General recyclable material including aluminium cans and plastics derived from source-separated kerbside municipal or commercial collections are forms of putrescible waste based on the Landfill Definitions.<br>Rewording of the acceptance specification for putrescible waste to more clearly describe |

| Condition no.                                        | Proposed amendments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                      | <p>the two different waste streams accepted under the waste type as follows:</p> <ul style="list-style-type: none"> <li>• comingled recyclables from source-separated kerbside municipal or commercial collections; and</li> <li>• paper and cardboard.</li> </ul> <p>Minor rewording of the R140 waste code to fix a typographical error.</p> <p>Removal of asbestos and tyres from Note 1 to Table 1 as neither of these wastes are authorised to be accepted at the premises.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3; Table 2 – Waste processing (formerly condition 4) | <p>Updated wording of condition and table headings to align with current regulatory approach.</p> <p>Removal of Inert Waste Type 1 (see discussion for condition 2 above).</p> <p>Specification of separate waste processing limits and/or specifications for comingled recyclables and paper and cardboard.</p> <p>Addition of hand-sorting to authorised processes for comingled recyclables and paper and cardboard and baling to authorised processes for paper and cardboard.</p> <p>Editing of waste processing limits and/or specifications for comingled recyclables as follows:</p> <ul style="list-style-type: none"> <li>• replacement of requirement that comingled recyclables are not processed on-site with a requirement that they are not baled on-site;</li> <li>• locations specified for storage of comingled recyclables edited to also apply to where they can be sorted; and</li> <li>• replacement of the term ‘internal unloading area’ to ‘storage shed’ to better describe the area where comingled recyclables can be stored and sorted.</li> </ul> <p>Editing of waste processing limits and/or specifications for paper and cardboard as follows:</p> <ul style="list-style-type: none"> <li>• removal of specification that paper and cardboard are not processed on-site;</li> <li>• locations specified for storage of paper and cardboard edited to also apply to where they can be sorted;</li> <li>• addition of requirement that no more than 175 tonnes of paper and cardboard is stored on-site at one time; and</li> <li>• addition of maximum dimensions, minimum separation distances and stacking configuration for stockpiles of baled paper and cardboard. These requirements are derived from the following guidance documents: <i>Guidance Note: GN02 Fire Prevention and Management in a Recycling Facility</i> (DFES 2020) and <i>Management and storage of combustible recyclable and waste materials – guideline</i> (EPA Victoria 2021).</li> </ul> |
| 4; Table 3 – Infrastructure and equipment            | <p>New condition specifying operational requirements and location of infrastructure and equipment for consistency with the current regulatory approach. New operational requirements for specific equipment are as follows:</p> <ul style="list-style-type: none"> <li>• clinical and pharmaceutical refrigerated containers – maintained in good working order and located inside the storage shed;</li> <li>• weighbridge – calibrated and maintained in good working order;</li> <li>• baler – located inside the storage shed and maintained in good working order; and</li> <li>• perimeter fence and entrance gates – maintained to minimise windblown waste crossing the premises boundary and prevent unauthorised access, entrance gates are securely locked when the premises is unattended and this infrastructure is regularly inspected and any damage repaired as soon as practicable.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5 – Windblown waste                                  | <p>Removal of requirement for the Licence Holder to take all reasonable and practical measures to ensure that no windblown litter escapes from the premises. This condition has been replaced with a more specific and enforceable condition that the Licence Holder must collect windblown waste from outside of designated waste storage areas and from along the premises boundary fence line at least once per week.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Condition no.                                                     | Proposed amendments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6 and 7 – Fire and Emergency Management Plan                      | New conditions requiring the preparation, maintenance and implementation of a Fire and Emergency Management Plan (FEMP). The Licence Holder is required to submit the FEMP by 31 May 2022. The FEMP should be a live document that is reviewed and updated over time. Further guidance on preparation of a FEMP is provided in <i>Guidance Note: GN02 Fire Prevention and Management in a Recycling Facility</i> (DFES 2020).                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 8 – Fire prevention and response                                  | New condition specifying controls to prevent and respond to potential fire events, including: <ul style="list-style-type: none"> <li>• firefighting equipment and systems are in good working order and capable of controlling a loose or baled material fire;</li> <li>• any fire on the premises is extinguished as soon as possible;</li> <li>• all recoverable firefighting wash-water and other waste that may result from firefighting on the premises is collected;</li> <li>• any firefighting wash-water is removed without delay by a carrier licenced under the <i>Environmental Protection (Controlled Waste) Regulations 2004</i> and all fire impacted waste is removed for disposal off-site to a suitably licensed premises; and</li> <li>• baled combustible materials are not used for sweeping of hardstand areas.</li> </ul> |
| 9; Table 4 – Monitoring of inputs and outputs                     | New condition requiring monitoring of waste inputs and outputs which is consistent with the current regulatory approach for licensed premises that receive wastes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10 and 11 – Books (formerly condition 6)                          | Addition of recordkeeping for books addressing the maintenance of infrastructure relating to condition 4 and monitoring of waste inputs and outputs under condition 9.<br>General recordkeeping requirements for books separated out to condition 11 and edited to require books to be retained for the duration of the licence instead of three years. These changes align with the department's current regulatory approach for recordkeeping requirements at prescribed premises.                                                                                                                                                                                                                                                                                                                                                             |
| 12 – Complaints (formerly condition 7)                            | Editing of condition wording to align with current regulatory approach which requires that complaints are recorded whether received directly by the Licence Holder or forwarded to them by the department.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 13 – Notification of fire or discharge event                      | New condition requiring the Licence Holder to notify the department of a fire on the premises or any accident, malfunction, or emergency which results or could result in the discharge of firefighting wash-water or other wastes from the premises.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 14 – Annual Audit Compliance Report (AACR) (formerly condition 8) | Replacement of Compliance Report condition with updated condition requiring submission of an Annual Audit Compliance Report to align with the current regulatory approach and terminology.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Definitions                                                       | Definitions table moved to follow conditions.<br>Definitions updated: Annual Period, CEO, department and premises.<br>Definitions added: Annual Audit Compliance Report, Landfill Definitions and Special Waste Type 2.<br>Definitions removed: Compliance Report, Environmental Harm, Material Environmental Harm, Pollution, Primary Activities, Serious Environmental Harm and Unreasonable Emission.                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Schedule 1; Figure 1                                              | Addition of a label for the storage shed as referenced in conditions 3 and 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Schedule 1; Figure 2                                              | Addition of a new premises layout map which shows the baler equipment location.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Condition no.           | Proposed amendments                                                                                                                                                                                                                                                                                                                                        |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Schedule 1;<br>Figure 3 | Addition of a new figure showing the interlaced configuration required for stockpiles of baled paper and cardboard; this figure is derived from the <i>Management and storage of combustible recyclable and waste materials – guideline</i> (EPA Victoria 2021).                                                                                           |
| Schedule 2              | <p>Removal of existing primary activities schedule because the information it contained is considered redundant based on the other amendments described above.</p> <p>The revised Schedule 2 presents coordinates of the premises boundary to achieve consistency with the current regulatory approach for premises occupying part of a cadastral lot.</p> |

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Fire and Emergency Services (DFES) 2020, *Guidance Note: GN04 Fire Prevention and Management in a Recycling Facility*, Perth, Western Australia.
3. Department of Water 2011, *Australind, Eaton and Picton Water Reserves: Drinking water source protection plan, Australind regional water supply scheme*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western Australia.
5. DWER 2019, *Landfill Waste Classification and Waste Definitions 1996 (as amended 2019)*, Perth, Western Australia.
6. DWER 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
7. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
8. Environmental Protection Authority Victoria 2021, *Management and storage of combustible recyclable and waste materials – guideline*, Melbourne, Victoria.



## Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

| Condition                                  | Summary of Licence Holder's comment                                                                                                                                                                                                                                                     | Department's response                                                                                                                                                 |
|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Revised licence                            | We've reviewed the amendments to L9066/2017/1 and we're happy with what has been proposed.                                                                                                                                                                                              | No changes requested to the draft Revised Licence.                                                                                                                    |
| 1                                          | <p><i>Response to department request to confirm that Inert Waste Type 1 is not received at the premises:</i></p> <p>This is correct, the facility only receives paper and cardboard, comingled recycling and a small amount of medical waste (which is under Special Waste Type 2).</p> | Inert Waste Type 1 removed from waste acceptance table as proposed in the draft Revised Licence.                                                                      |
| 3                                          | <p><i>Response to department request to confirm that the external unloading area and storage shed are the only areas designated for storage of baled paper and cardboard:</i></p> <p>Yes, this is correct.</p>                                                                          | No change to waste processing condition as proposed in the draft Revised Licence.                                                                                     |
| 3                                          | <p><i>Response to department request to confirm the height of the storage shed roof:</i></p> <p>The apex of the storage shed roof is 7.5m high.</p>                                                                                                                                     | No change to the maximum height for stockpiles of baled paper and cardboard specified in the draft Revised Licence was required based on the height of the shed roof. |
| Schedule 1, Figure 2 – Premises layout     | <p><i>Response to department request to clarify what the label 'compactor' refers to and whether this is mobile equipment which should be added to Table 3:</i></p> <p>The compactor is no longer onsite and won't be required going forward.</p>                                       | Reference to the compactor has been removed from Figure 2.                                                                                                            |
| Schedule 2 – Premises boundary coordinates | <p><i>Response to department request to confirm whether the coordinates accurately depict the portion of Lot 101 on Deposited Plan 29618 within the leased area that comprises the premises boundary:</i></p> <p>That looks right.</p>                                                  | No change to the premises boundary coordinates specified in the draft Revised Licence.                                                                                |

## Appendix 2: Application validation summary

| SECTION 1: APPLICATION SUMMARY                                                                                                           |                                                                     |                                                                                                                                                               |              |     |
|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----|
| <b>Application type</b>                                                                                                                  |                                                                     |                                                                                                                                                               |              |     |
| Amendment to licence                                                                                                                     | <input checked="" type="checkbox"/>                                 | Current licence number:                                                                                                                                       | L9066/2017/1 |     |
|                                                                                                                                          |                                                                     | Relevant works approval number:                                                                                                                               |              | N/A |
| Date application received                                                                                                                |                                                                     | 07/10/2021                                                                                                                                                    |              |     |
| <b>Applicant and Premises details</b>                                                                                                    |                                                                     |                                                                                                                                                               |              |     |
| Applicant name/s (full legal name/s)                                                                                                     |                                                                     | SUEZ Recycling & Recovery Pty Ltd                                                                                                                             |              |     |
| Premises name                                                                                                                            |                                                                     | SUEZ Picton Resource Recovery Centre                                                                                                                          |              |     |
| Premises location                                                                                                                        |                                                                     | 21 Giorgi Road PICTON WA 6229                                                                                                                                 |              |     |
| Local Government Authority                                                                                                               |                                                                     | City of Bunbury                                                                                                                                               |              |     |
| <b>Application documents</b>                                                                                                             |                                                                     |                                                                                                                                                               |              |     |
| HPCM file reference number:                                                                                                              |                                                                     | DER2017/000998-1                                                                                                                                              |              |     |
| Key application documents (additional to application form):                                                                              |                                                                     | <i>Supporting documentation</i>                                                                                                                               |              |     |
| <b>Scope of application/assessment</b>                                                                                                   |                                                                     |                                                                                                                                                               |              |     |
| Summary of proposed activities or changes to existing operations.                                                                        |                                                                     | <i>Licence amendment</i><br>Installation of baling equipment to undertake baling operations of the paper and cardboard wastes currently received at premises. |              |     |
| <b>Category number/s (activities that cause the premises to become prescribed premises)</b>                                              |                                                                     |                                                                                                                                                               |              |     |
| <b>Table 1: Prescribed premises categories</b>                                                                                           |                                                                     |                                                                                                                                                               |              |     |
| Prescribed premises category and description                                                                                             | Assessed production or design capacity                              | Proposed changes to the production or design capacity (amendments only)                                                                                       |              |     |
| Category 62 Solid waste depot                                                                                                            | 45,000 tpa                                                          | NA (no change proposed)                                                                                                                                       |              |     |
| <b>Legislative context and other approvals</b>                                                                                           |                                                                     |                                                                                                                                                               |              |     |
| Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Referral decision No:<br>Managed under Part V <input type="checkbox"/><br>Assessed under Part IV <input type="checkbox"/>                                     |              |     |
| Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?                                         | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Ministerial statement No:<br>EPA Report No:                                                                                                                   |              |     |
| Has the proposal been referred and/or assessed under the EPBC Act?                                                                       | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Reference No:                                                                                                                                                 |              |     |

|                                                                                                                                                                                                            |                                                                                                  |                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Has the applicant demonstrated occupancy (proof of occupier status)?                                                                                                                                       | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                              | Certificate of title <input checked="" type="checkbox"/> On file<br>General lease <input checked="" type="checkbox"/> Expiry: On file<br>Mining lease / tenement <input type="checkbox"/><br>Expiry:<br>Other evidence <input type="checkbox"/> Expiry: |
| Has the applicant obtained all relevant planning approvals?                                                                                                                                                | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | Approval: Existing planning approvals in place<br>Expiry date:<br>If N/A explain why?                                                                                                                                                                   |
| Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?                                                                                                    | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | CPS No: N/A<br>No clearing is proposed.                                                                                                                                                                                                                 |
| Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?                                                                                                 | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | Application reference No: N/A<br>Licence/permit No: N/A<br>No clearing is proposed.                                                                                                                                                                     |
| Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?                                                                                                | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | Application reference No:<br>Licence/permit No:<br>Licence / permit not required.                                                                                                                                                                       |
| Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?                                                                                            | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | Name: N/A<br>Type: Proclaimed Groundwater Area/Surface Water Area<br>Has Regulatory Services (Water) been consulted?<br>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/><br>Regional office: South West |
| Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?                                                                                                                                   | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | Name: N/A<br>Priority: N/A<br>Are the proposed activities/landuse compatible with the PDWSA (refer to <a href="#">WQPN 25</a> )?<br>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>                               |
| Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i> ) | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | N/A                                                                                                                                                                                                                                                     |

|                                                                                                       |                                                                     |                                                    |
|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|----------------------------------------------------|
| Is the Premises within an Environmental Protection Policy (EPP) Area?                                 | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | N/A                                                |
| Is the Premises subject to any EPP requirements?                                                      | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |                                                    |
| Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Classification: N/A<br>Date of classification: N/A |