



Decision Document

Environmental Protection Act 1986, Part V

Proponent: **Resource Recovery Solutions Pty Ltd**

Licence: **L7742/1998/7**

Registered office: c/o Grant Thornton
10 Kings Park Road
WEST PERTH WA 6005

ACN: 128 285 263

Premises address: Waste Care WA
10 Clune Street
BAYSWATER WA 6053
Being Lot 2 on Plan 28971

Issue date: Thursday 26 November 2015

Commencement date: Saturday, 5 December 2015

Expiry date: Tuesday, 4 December 2035

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER) CEO's delegated officer has decided to amend this licence. The delegated officer considers that in reaching this decision, he has taken into account all relevant considerations.

Decision Document prepared by: Lauren Fox
A/Senior Licensing Officer

Decision Document authorised by: Alan Kietzmann
Delegated Officer



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1 Purpose of this Document

This decision document explains how the DER delegated officer has assessed and determined the application and provides a record of the decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/>	New Licence <input checked="" type="checkbox"/>
	Licence amendment <input type="checkbox"/>	Works Approval amendment <input type="checkbox"/>
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	13	85,000 tonnes per annual period
	61A	270,000 tonnes per annual period
Application verified	Date: N/A	
Application fee paid	Date: N/A	
Works Approval has been complied with	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Compliance Certificate received	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Commercial-in-confidence claim	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Commercial-in-confidence claim outcome	N/A	
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>



3 Executive summary of proposal and assessment

1. Background

Resource Recovery Solutions Pty Ltd trading as Waste Care WA (Waste Care) is a West Australian owned and operated company. The premises is located at Lot 2 on Plan 28971, Clune Street in Bayswater, within the City of Bayswater. The premises is located within an area zoned as 'General Industry'.

The premises accepts construction and demolition waste (C&D) from a variety of sources such as construction sites and households. All loads are visually inspected at the entrance prior to being accepted. Any loads containing non-conforming materials are not accepted. Waste requiring mechanical sorting is received within an enclosed warehouse which contains an automated C&D processing facility.

The materials are separated out into ferrous metals, other metals, various sized aggregate, and sands and placed into dedicated storage areas or skip bins. Putrescibles within the waste stream and other residual wastes are also separated out and stored pending removal offsite. A compactor at the premises bulks the waste in preparation for removal.

Recovered marketable product is stockpiled outside for market and/or additional processing including crushing.

2. Location in environmental setting

DER's GIS mapping system indicates that a site of aboriginal significance (artefacts) is located immediately adjacent to the north west of the premises. A damplands is located approximately 240m south. The nearest residential properties are located approximately 600m to the north of the premises, and a school is located approximately 950m to the south west. The mapping system also indicates that the surrounding land uses are offices, factories, and vacant non-residential land, with Tonkin Highway to the west of the premises.

Department of Water's *Perth Groundwater Atlas* (PGA) indicates that groundwater is found at a depth of 12 – 13.5 meters below ground level with an aquifer thickness of 20m. PGA has identified that groundwater is marginally saline (total dissolved solids between 500 – 1000 mg/L), has a high risk of iron staining and a moderate to low risk of acid sulfate soils. PGA describes the surface geology as Bassendean Sand. Immediately adjacent to the north-east of the premises boundary is a Water Corporation compensating basin.

3. Proposal

Works Approval W5597/2014/1 was granted on 2 April 2015 for the construction works of a waste transfer station, for the acceptance of putrescible waste (including municipal waste) and reconfiguration of the site with an increase of throughput from 210,000 tonnes per annual period to 270,000 tonnes per annual period combined total. Given that the facility is reprocessing solid waste, prescribed premises category 62 (solid waste depot) has been replaced with category 61A (solid waste facility) to align the premises with the most applicable category.

Resource Recovery Solutions Pty Ltd has completed the construction works under Works Approval W5597/2014/1 and has submitted a Compliance Document and Licence Amendment Application on 1 July 2016 in accordance with condition 5.1.1. The Compliance Document stated compliance with the conditions of the Works Approval, subject to the following variations:

1. Only one weighbridge at site present instead of two. No operational need for two weighbridges, hence the Licence Holder opted for improved space utilisation.
2. Gatehouse was not relocated, due to there being only one weighbridge.



3. Transfer vehicle loading bay changed from belowground loading operation utilisation a lift mechanism to an at ground level loading operation utilising a conveyor system. This was changed due to operational difficulties.
4. Loading operation relocated to the opposite end of the building, to facilitate the conveyor loading mechanism.
5. Future picking station added within the enclosed building.
6. With the use of conveyors there was a need to reduce the size of some of the waste particles. As a result, a shredder has been included within the transfer building.
7. Wastewater storage pit moved to the vehicle load-out bay. As a consequence of the conveyor mechanism and the need for a conveyor pit, the original wastewater collection system did not work; hence the wastewater collection was modified to include a collection pit under the conveyor (low point within the building) and a wastewater storage pit within the vehicle loadout bay.
8. Single open entrance changed to two smaller entrances with roller doors. The original 20m open entrance was changed to an 8m and 6.5m entrance will roller doors to facilitate the conveyor operation.
9. Following discussions with the facility insurers, it was determined that there was no need for fire detectors within the transfer station.
10. Deletion of the dust suppression system. Due to the building entrances having roller doors, dust management can easily be controlled within the transfer station building and hence the mist sprays were omitted.

The Delegated Officer has determined that because the crushing facility is within 1,000m of sensitive receptors, there is an elevated risk to the environment, and may require greater regulatory controls.

The main emissions from this activity are dust, noise and odour. The licensee has a number of control measures in place to reduce the impacts from these emissions including sprinkler and misting systems (in the sorting facility), wheel wash, reduced speed limits, restricted operating times and the use of electric machinery. Additionally, the primary aggregate stockpile forms a U-shape around the secondary mobile vibratory screen to provide an aesthetic, dust and noise barrier to surrounding land uses.

4. Planning issues – reduced throughput

The works approval was authorised for the acceptance of up to 100,000 tonnes per annum of putrescible waste however the occupier has advised through this amendment application that the requested annual throughput is 60,000 tonnes per year of putrescible waste, based on planning requirements from the City of Bayswater.

5. Key Documents Used in Assessment

Key documents considered or reviewed as part of the assessment are documented in Appendix A.

The Delegated Officer has considered documentation provided in support of works approval W5597/2014/1 to assess the risk posed by emissions and discharges from the whole of site operations.

6. Applicable Regulations, Standards and Guidelines

The overarching legislative framework of this assessment is the *Environmental Protection Act 1986* and *Environmental Protection Regulations 1987*. DER Guidance Statements and documents which inform the assessment in line with this legislation are as follows:



- *Landfill Waste Classification and Waste Definitions 1996 (As amended December 2009);*
- *Guidelines for managing asbestos at construction and demolition waste recycling facilities (December 2012);*
- *Guidance Statement: Regulatory Principles (July 2015);*
- *Guidance Statement: Licence and works approvals process (September 2015);*
- *Guidance Statement: Setting Conditions (October 2015);*
- *Guidance Statement: Land Use Planning (October 2015); and*
- *Guidance Statement: Licence duration (November 2015).*

4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE

Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Interpretation	N/A	<p>The following definitions have been included in the licence as they are referenced within the licence conditions and require context:</p> <ul style="list-style-type: none"> • Acceptance criteria; • Asbestos; • ACM; • Attachment 1; • Attachment 2; • Attachment 3; • C&D waste; • Class I Landfill; • Class II landfill; • Classified load; • Construction and demolition waste; • Contaminated solid waste; • Controlled waste; • Compliance Report • Department • Damp; • DER; and • Putrescible waste 	N/A

DECISION TABLE

Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	N/A	Previous licence condition 1.2.1 and 1.2.2 have been removed in line with DER's <i>Guidance Statement: Setting Conditions</i> . These conditions were not enforceable as they were not sufficiently clear or certain. The 'general conditions' section has been removed from the licence. The 'Premises operation' section of the licence has been renumbered to section 1.2.	DER Guidance Statement: <i>Setting Conditions</i> , October 2015
Premises operation	L1.2.1 to L1.2.24	Please refer to Appendix B	Application supporting documentation
Fugitive emissions	L1.2.15 to L1.2.19	Please refer to Appendix B	Application supporting documentation
Odour	L1.2.15	Please refer to Appendix B	Application supporting documentation
Noise	L1.2.24 and L2.1.2	Please refer to Appendix B	Application supporting documentation
Monitoring of inputs and outputs	L2.1.1	Condition 2.1.1 requires monitoring of inputs and outputs to monitor compliance with condition 1.3.1. Monitoring of crushed building material is also requested to ensure compliance with Category 13 throughputs. Condition 2.1.1 has been amended to include putrescible waste and contaminated solid waste.	Application supporting documentation
Information	3.1.2	Referencing of the Compliance Reporting has been updated and the Annual Audit Compliance Report (AACR) template has been removed from the licence; it is updated and assessable at the Department's website.	Application supporting documentation
Licence Duration	N/A	The premises has planning approval from the City of Bayswater with no expiry date. The licence duration was extended on 29 April 2016 to 4 December 2035 in accordance with DER's Guidance Statement: <i>Licence Duration</i> (revised May 2015)	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
25/08/2016	Application referred to City of Bayswater	No comments received	N/A
01/09/2016	Proponent sent a copy of draft instrument	Comments received from occupier 2/09/2016 to request a change in hours of operation from 7am to 6am, with noise generating operations (crushing etc.) to be verified through noise monitoring against 'night-time' noise levels as prescribed in the <i>Environmental Protection (Noise) Regulations 1997</i> .	Hours of operation changed from 7am to 6am.



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High



Appendix A: Key Documents and References

The key documentation considered and reviewed and as part of the assessment is detailed below.

	Document Title	Availability
1	Licence amendment application and supporting documentation received 30 June 2016	DER records
2	<i>Inert Waste Transfer and Recycling Facility – Lot 2, Clune Street, Bayswater. Instant Waste Management Environmental Management Plan</i> , Prepared by Cardno, August 2012	
3	Works Approval W5597/2014/1 – approval for construction of the transfer station and relevant supporting documentation	
4	DER <i>Guidance Statement on Regulatory principles</i> , July 2015	accessed at http://www.der.wa.gov.au
5	DER <i>Guidance Statement: Land Use Planning</i> , October 2015;	
6	DER <i>Guidance Statement on Setting conditions</i> , October 2015	
7	DER <i>Guidance Statement on Licence duration</i> , November 2014	
8	DER <i>Guidance Statement on Licensing and works approvals processes</i> , September 2015	
9	DER's Guideline: <i>Treatment and management of soil and water in acid sulfate soil landscapes</i> , June 2015	



Appendix B

Premises Operation

Condition 1.2.1(formerly 1.3.1) limits the waste types and quantities that can be accepted at the premises to those that have been assessed under the licence application as suitable given the infrastructure and control measures at the premises. Condition 1.2.1 has been amended to include putrescible waste and contaminated solid waste (meeting Class II landfill criteria) as requested by the occupier. The limit of these two new waste types is 60,000 tonnes per annual period based on City of Bayswater planning approval.

Condition 1.2.2, requiring the removal of non-conforming waste, has not been amended other than renumbering. Condition 1.2.3 has been amended to require any asbestos waste to be removed offsite within 24 hours as committed by the occupier. This previously required it to be removed 'as soon as practicable'. This is discussed further in the 'Fugitive emissions' section.

Conditions 1.2.4 to 1.2.14 have been included to specifically address asbestos management and reflect the occupier's commitments to complying with the *Guidelines for managing asbestos at construction and demolition waste recycling facilities* (2012), published by the Department of Environment and Conservation (DER Asbestos Guidelines). These conditions replace and/or modify former conditions 1.3.2, 1.3.6, 1.3.7 and 1.3.8. The risk assessment associated with these conditions is detailed below under the 'Fugitive Emissions' section.

Condition 1.2.15 (and Table 1.2.2) has been amended to include putrescible waste and contaminated solid waste into the authorised waste processes undertaken onsite. The table has also been amended for the existing waste types to make it clearer on what the requirements for processing, including any limits, are for the occupier. This is consistent with DER's Guidance Statement: *Setting Conditions* (September 2015).

Conditions 1.2.16 to 1.2.19 have been included for dust emission management and are discussed in detail in the 'Fugitive Emissions' section below.

Condition 1.2.20 (formerly 1.3.9) has not been amended other than renumbering. Condition 1.2.21 (formerly 1.3.10) has been amended to include the requirement for a sign at the Premises specifying 'no asbestos'. This is consistent with the occupier's commitment to having a sign to this effect at the Premises.

Vermin

Emission: Vermin and pests attracted by the storage and processing of putrescible waste.

Impact: Vermin may cause a public nuisance impacts at nearby receptors or potentially transmit infectious disease. Vermin attracted to the area may impact local ecosystems. Given the limited volume of household waste and putrescibles that are accepted on site there is expected to be limited food source for such vermin.

Controls: The applicant proposes to engage a pest controller if vermin are identified on site. The applicant also proposes to use rat traps around the premises to identify if any rats or mice are present.

Risk Assessment

Consequence: Insignificant

Likelihood: Possible



Risk Rating: Low

Regulatory Controls

Condition 1.2.22 requires the licensee to implement control measures to prevent infestations of pests, flies and vermin at the premises to minimise the likelihood of any impacts and reflects the occupier's commitments to vermin/pest management.

Residual Risk

Consequence: Insignificant

Likelihood: Possible

Risk Rating: Low

Windblown waste

Emission: Windblown waste from Premises generating offsite litter, particularly from the storage of plastics.

Impact: Contamination of surrounding land and surface water drainage systems from the addition of litter.

Controls: The occupier's supporting documentation specifies the following controls for litter management:

- The loading bay is enclosed on three sides with a net across to top to contain litter; and
- Regular collection of litter identified during daily site inspections by staff.

Risk Assessment

Consequence: Minor

Likelihood: Possible

Risk Rating: Moderate

Regulatory Controls

Given the moderate risk rating of windblown waste and the proximity to the compensation basin, condition 1.2.23 has been included to require windblown waste to be collected from boundary fences when required to prevent litter escaping the premises.

Residual Risk

Consequence: Minor

Likelihood: Possible

Risk Rating: Moderate

Hydrocarbon storage

The works approval application advised that an existing 15,000L diesel storage tank is licensed by the Department of Mines and Petroleum. Small quantities (up to 20L) of oils and grease are stored onsite for maintenance purposes, as are small quantities of lubricants. Chemicals such as detergents, pesticides and odour suppressant are stored onsite in 5L and 50L (odour suppressant only) containers.

Although the storage of fuels is not regulated by DER as it is not a prescribed activity, any discharges or spills of fuel, oil or other chemicals may be subject to the *Environmental Protection (Unauthorised Discharges) Regulations 2004*. No conditions for hydrocarbon storage have been included on the licence.



Leachate

Emission: Stormwater contaminated with leachate from storage and processing of putrescible waste. Stormwater contaminated from the storage of non-conforming wastes. Leachate generated from onsite activities infiltrating into groundwater or discharging to surface water (compensation basin).

Impact: Contamination of surrounding land and surface water drainage systems. Potential impacts on ecology of water in the compensation basin adjacent to the Premises and groundwater from the addition of nutrients, hydrocarbons and other contaminants.

Controls: The new transfer station is roofed with gutters and downpipes directing stormwater into soak wells without coming into contact with the premises operations. A 5,000L capacity underground impervious tank has been installed beneath the site to collect stormwater runoff from the buildings guttering. This water is pumped to a 95,000 Litre capacity secondary water storage tank located above ground. This water is used as dust suppression on-site. The combined capacity of the water storage tanks is 100,000 Litres.

The application states that putrescible waste will be unloaded and handled within the enclosed transfer station. The transfer station has a 150mm perimeter bund to contain any leachate generated inside and prevent stormwater entering the building. The building has been designed to drain to a trench drain and into a belowground wastewater storage tank (7,500L capacity) prior to offsite removal. The wastewater storage tank has been fitted with level indicators to monitor the volume stored and an alarm system to notify premises operators when levels are reaching capacity.

The existing enclosed sorting facility will not accept any putrescible waste and waste accepted to this area is predominantly inert in nature, which poses a lower risk to the environment, and is stored on a hardstand.

Risk Assessment

Consequence: Moderate

Likelihood: Unlikely

Risk Rating: Moderate

Regulatory Controls

Condition 1.2.1 has been included on the licence to limit the types and quantities of waste that can be accepted at the premises to those that have been assessed as suitable and can be sufficiently managed through the premises infrastructure and controls. Condition 1.2.2 requires the occupier to remove any wastes from the Premises that are not authorised by condition 1.2.1 to assist in mitigating the potential leachate risk of runoff from stockpiling non-conforming waste.

Table 1.2.2 (condition 1.2.15) requires all waste to be stored on a hardstand within either the existing sorting facility, or within the transfer station, to assist in controlling leachate generation. All leachate generating wastes (putrescible) are required to be unloaded and stored in the enclosed transfer station which is fitted with an underground tank for leachate/wastewater collection and has a bunded hardstand. This condition reflects the existing site infrastructure and controls. Other waste types accepted onsite are inert and by nature, generate little to no leachate.

Residual Risk

Consequence: Moderate

Likelihood: Unlikely

Risk Rating: Moderate



Fugitive Emissions

The occupier has previously provided the document "Inert Waste Transfer and Recycling Facility – Lot 2, Clune Street, Bayswater. Instant Waste Management Environmental Management Plan" (EMP). The EMP prepared by Cardno in August 2012 in regards to the sorting facility operations. This document has been considered by the Delegated Officer as part of this amendment application to determine if the current controls are sufficient at managing risks associated with dust emissions.

The Delegated Officer has determined that because the crushing facility is within 1,000m of sensitive receptors, there is an elevated risk to the environment, and may require greater regulatory controls.

Emission Description

Emission: Fugitive dust emissions from the crushing and screening of C&D waste which have the potential to contain asbestos, dust lift-off from trafficked roads, lift-off from stockpiles, and handling of C&D wastes and screened products.

Impact: Degradation of local air quality. Dust emissions blocking photosynthesis of vegetation in the compensation basin located adjacent to the Premises and particulates settling in the surface water within the compensation basin.

The premises is adjacent to Tonkin highway and excessive dust may impact motorist visibility. DER's Incident and Complaints Management System indicates there have been no dust complaints received in regards to the premises since 2004.

Nuisance impacts on the comfort and amenity and health and wellbeing impacts on sensitive receptors located 600m north of the site. Potential human health impacts from any asbestos fibres in dust emissions.

Impacts to human receptors include:

- Health
 - Asbestosis;
 - Irritation of eyes;
 - Coughing;
 - Sneezing;
 - Hayfever;
 - Increasing symptoms of existing respiratory conditions such as:
 - Asthma;
 - Emphysema; and
 - Chronic obstructive airways disease.
- Nuisance
 - Dust covering people's homes and property;
 - Impacting of people's amenities; and
 - Impacting on people's comfort.

Controls (dust): The amendment application has proposed the following dust control measures for the waste transfer station:

- Loads that are predominantly dusty will either be refused entry onto the premises or be managed in a way that minimises dust generation;
- Waste unloading/loading and handling will predominantly occur within an enclosed building. The areas where dust can escape are from the 8m and 6.5m roller doors which can be closed as required to prevent dust escaping the transfer station;
- New wheel wash installed at the site exit;



- Ongoing monitoring of dust emissions by staff;
- Maintaining a complaints register;
- If unacceptable levels of dust are identified, the following contingencies may be considered:
 - Installation of speed humps to slow vehicle movements;
 - Restriction of dust generating activities to a time when weather conditions limit offsite discharges.

The EMP outlined the following controls associated with the existing sorting facility:

- Sprinkler system at entrance to wet loads arriving onsite;
- All waste (excluding putrescible and contaminated solid waste) is unloaded into the enclosed warehouse;
- A misting system is installed in the warehouse;
- Sprinkler/misting system installed on the outdoor secondary screen;
- Use of a sprinkler system to wet down roads and stockpiles;
- Wheel wash at site exit;
- Installation of additional fogging/sprinkler/misters at the crusher and sand segregation system;
- Outdoor screening activities halted during severe wind conditions; and
- Enforcing an onsite 5km/hr maximum speed limit.

Risk Assessment (Dust)

Consequence: Moderate (when dust abatement is operational)

Likelihood: Possible

Risk Rating: Moderate

Regulatory Controls

It is noted that the dust suppression system proposed and authorised under the works approval was not constructed. Table 1.2.2 (in condition 1.2.15) requires all loads (other than putrescible and contaminated solid waste which has a higher potential to generate leachate) to be wet down prior to unloading to assist in controlling dust emissions.

Conditions 1.2.16 to 1.2.19 (in the 'Premises operation' section) have been included on the licence to assist in reducing dust emissions. These conditions mirror the dust abatement measures proposed in the application and previous documentation provided to DER (as detailed above in the 'Emissions description' section).

Residual Risk

Consequence: Moderate

Likelihood: Possible

Risk Rating: Moderate

Dust containing asbestos

The amendment application documentation outlines the following controls that are either currently being undertaken, or will be implemented to manage asbestos:

- Customers advised that the site does not accept asbestos, including signage at entrance outlining this;
- Staff have been trained in asbestos identification and are aware on what actions to take if it is identified;
- All loads visually inspected and sorted. If asbestos is identified the load will either be rejected or asbestos separated for offsite removal within 24 hours;
- Crushed products managed in accordance with the DER Asbestos Guidelines;



- Identified asbestos is handled in accordance with the site Asbestos Management Plan (AMP).

The EMP has addressed asbestos management which for the purpose of this assessment, has been considered as the AMP referred to in the amendment application. The EMP specifies that asbestos is managed and transported in accordance with the *Health (Asbestos) Regulations 1992* and the *Environmental Protection (Controlled Waste) Regulations 2004*.

The proposed controls for fugitive dust assist in reducing the likelihood of asbestos fibres being released.

Risk Assessment (**Asbestos fibres**)

Consequence: Severe

Likelihood: Unlikely

Risk Rating: High

The controls proposed by the proponent should control asbestos such that it is unlikely that asbestos fibres will be released from the activities. However, due to the severe consequences of asbestos fibres reaching a receptor the risk rating is high.

Regulatory Controls

Previous licence conditions 1.3.1, 1.3.2, 1.3.4, and 1.3.6 to 1.3.8 related to asbestos management at the site. These conditions have either been modified or replaced as detailed below.

Condition (and table) 1.2.1 specifies that waste containing visible asbestos or Asbestos Containing Material (ACM) shall not be accepted onsite. This condition assists in reducing the risk of asbestos or ACM being accepted which also reduces the risk that this type of waste will be crushed or screened and has been amended from the previous licence by way of renumbering (formerly 1.3.1) and for the inclusion of putrescible wastes. There have been no changes to requirements surrounding asbestos management in this condition.

Former condition 1.3.2 required waste to be visually inspected upon arrival and again before it entered any stockpile or treatment process. This was included to maintain visual monitoring of asbestos in the waste stream, which is now incorporated into the set of asbestos conditions.

Previous condition 1.3.3, requiring non-conforming waste to be removed offsite which assists in the separation and removal of any asbestos material that may be received in mixed waste streams, has been renumbered as condition 1.2.2.

Former condition 1.3.4 required asbestos to be removed offsite 'as soon as practicable'. This has been amended to require asbestos removal within 24 hours, as proposed by the occupier, and has been renumbered as condition 1.2.3.

Conditions 1.3.6 and 1.3.7 required the occupier to monitor for asbestos content in processed waste and to specify a limit of 0.001%w/w. Former condition 1.3.8 required the occupier to comply with AMP. These conditions have been replaced with a series of updated conditions (1.2.3 to 1.2.13) which have been included specifically in regards to asbestos management. These conditions have been included to assist in reducing the risk of asbestos fibres being released during crushing and screening operations, as well as reducing the risk to public health when the processed material is re-used. These conditions are representative of the requirements for asbestos management as specified in the DER Asbestos Guidelines, which the occupier has committed to complying with.

Condition 1.3.10 of the previous licence has been amended to include the requirement for signage specifying 'no asbestos'. This condition has been renumbered as condition 1.2.20.



The regulatory controls included for general fugitive dust emissions also assist in reducing the likelihood of asbestos being released.

Residual Risk (Asbestos fibres)

Consequence: Severe

Likelihood: Rare

Risk Rating: High

While impacts from releases of asbestos fibres is considered to be severe, the risk of fibres being released with regulatory controls in place is rare and therefore despite the residual risk being high, this is considered to be acceptable.

Odour

Emission: Unreasonable odour emissions from the storage and sorting of putrescible waste accepted at the premises.

Impact: Potential for nuisance odour impacts on the wellbeing and amenity of odour sensitive receptors located 600m north of the premises. Odour impacts are anticipated to be localised. DER's Incident and Complaints Management System indicates there have been no odour complaints received in regards to the premises since 2004.

Controls: The occupier has proposed the following odour controls:

- Receiving of putrescible (odour generating) waste inside an enclosed warehouse;
- The occupier has committed to removing putrescible waste from the site within 24 hours;
- Regular washing of the transfer station floor;
- Regular pumping out the wastewater holding tank;
- Use of odour suppressors/deodorisers sprayed onto odorous material;
- If an odorous load of putrescible waste is identified, it will be removed offsite.

Risk Assessment

Consequence: Minor

Likelihood: Unlikely

Risk Rating: Moderate

Regulatory Controls

Table 1.2.2 of condition 1.2.14 requires putrescible waste to be removed offsite within 24 hours of receipt and to be unloaded within an enclosed shed. These conditions reflect the occupier's commitments to odour management.

Residual Risk

Consequence: Minor

Likelihood: Unlikely

Risk Rating: Moderate

Noise Emissions

Emission Description

Emission: Unreasonable noise emissions from the crushing and screening of waste as well as noise emitted from vehicle movements (including reversing beepers) and the general handling of waste.



Impact: Reduced wellbeing, amenity and comfort of sensitive noise receptors located 600m north of the Premises. DER's Incident and Complaints Management System indicates there have been no noise complaints received regarding this premises.

Controls: The licensee initially accepts and sorts waste within an enclosed warehouse reducing the impacts of noise from handling of waste and screening activities. The licensee uses electronic machinery instead of petrol/diesel engines for quieter operating. Stockpiles are strategically placed outside of the warehouse to provide a buffer for noise, particularly a U-shape of primary aggregate at the northern boundary.

The City of Bayswater (the City) has restricted the transfer station operations to 0600 to 1730 hours Monday to Friday and 0600 to 1400 hours on Saturdays. Other than the 0600 to 0700 hour operations, the City's authorised hours of operations are within the 'day time' hours prescribed in the *Environmental Protection (Noise) Regulations 1997* (EP Noise Regulations). The 'day time' hours prescribe a higher level of authorised noise to be emitted from premises. The occupier has stated in the amendment application that "there will be no crushing, shredding or screening activities before 7:00".

Risk Assessment

Consequence: Minor

Likelihood: Possible

Risk Rating: Moderate

Regulatory Controls

The occupier has installed a shredder into the transfer station which was not included with the works approval assessment which has the potential to generate unreasonable noise emissions. Given the moderate risk rating of noise emissions, condition (and table) 2.2.1 has been included on the licence to require noise monitoring of the Premises to demonstrate that the facility meets compliance with the EP Noise Regulations. Where the premises does not meet the assigned noise levels, the occupier is required to propose noise control measures to address compliance.

Condition 1.2.24 was included on the licence to limit the commencement time of operating the crusher, screeners or shredders to 7am which reflected the occupier's commitment. Following consultation with the occupier, the proposed hours for commencement of this machinery has been changed to 6am as requested by the occupier. This condition currently limits the cessation of these activities to the occupier's proposed hours (5pm Monday to Friday and 2pm on Saturdays).

The Delegated Officer has determined that this earlier start time intersects the EP Noise Regulation 'night-time' assigned values and may pose an increased risk of emission levels. Condition 2.1.1 has subsequently been expanded to require validation for the period 6am to 7am noise levels. If the noise monitoring required under condition 2.2.1 shows that the assigned 'night-time' noise levels specified under the EP Noise Regulations cannot be met, this condition will be amended to restrict operations to the 'day-time' hours, if it meets that prescribed standard.

Residual Risk

Consequence: Minor

Likelihood: Possible

Risk Rating: Moderate