Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Licence Amendment

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

Licence Number	L3000/2025/1
Licence Holder	Tyrecycle Pty Ltd
ACN	085 545 053
File number	INS-0003000
Premises	Tyrecycle Wedgefield 22 Moorambine Street WEDGEFIELD WA 6721 Legal description Lot 100 on Deposited Plan 61456
Date of report	5 May 2026
Decision	Revised licence granted

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1. Decision summary

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 L3000/2025/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 Overview of premises

Tyrecycle Pty Ltd operates a Category 57 used tyre storage and Category 61A solid waste facility to allow for the reprocessing of used tyres and conveyor belts to recover the rubber and steel components. The premises is in Wedgefield, approximately 6 km south of the town of Port Hedland. The premises was constructed under works approval W6821/2023/1, and licence L3000/2025/1 was granted on 7 October 2025.

The Tyrecycle Wedgefield facility receives and processes large mining tyres and conveyor belts that are cut into 60-70 kg pieces and then transported offsite for further processing. In the licence granted in 2025, the premises was approved to shred a combined total of 12,000 tonnes of unburnt tyres and conveyor belts. Conveyor belt processing was restricted to 3,000 tonnes per year.

2.3 Application summary

On 29 January 2026, the licence holder submitted an application to the department to amend Licence L3000/2025/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

The proposed amendment is to increase the shredding throughput of tyres and conveyor belts to a combined total of 20,000 tonnes per year. On 24 March 2026, the licence holder clarified that the quantity of tyres onsite at any one time will not be changing, however requested that the 3,000 tonnes per year limit of conveyor belt receivals be unspecified and encapsulated within the 20,000 tonnes per annum limit. The licence holder specified that an excavator and demolition shears, specifically tailored for cutting conveyor belts, will be used to manage the increase to conveyor belt processing.

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 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Sources	Emission	Potential pathways	Proposed controls
Operation			
Receipt, handling, storage and shredding of used tyres and conveyor belts	Dust	Air / wind dispersion	• Outside areas are bituminised hardstand. • Minimal dust generated from whole tyres and conveyor belts due to the large size of the cut pieces. • Tyre processing will take place in an enclosed building. • Regular cleaning and housekeeping will be carried out.
Receipt, handling, storage and shredding of used tyres and conveyor belts	Noise	Air / wind dispersion	• The modelled scenarios comply with the L_{A10} assigned noise levels, when the roller doors are closed. • Further noise monitoring will be conducted during operations to determine the effectiveness of the louvres and overall compliance with the *Environmental Protection (Noise) Regulations 1997*. • Fixed plant to be inspected and serviced in accordance with manufacturer specifications. • All mobile equipment is to be inspected daily and serviced in accordance with each equipment's manufacturer recommended service schedule.
Receipt, handling, storage and shredding of used tyres and conveyor belts	Unauthorised fires – smoke and fire spread	Air / wind dispersion	Premises design based on DFES Guidance Note: GN02 Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres, with the following exceptions, as reviewed by DFES: • tyres may be stored as close as 6 m from the dome structure, not the required 18 m. The dome is made from combustible materials and is expected to be lost in the event of a fire. The applicant undertook a fire safety risk

Sources	Emission	Potential pathways	Proposed controls
			assessment which determined there would be no consequence to occupant safety or fire brigade intervention. The only consequence was of a commercial nature by the loss of infrastructure, which the applicant was satisfied in accepting to enable all other aspects of operating to be achieved. • piles of tyre stacks and conveyor belt stacks are separated from other piles by a minimum of 6 m, not 18 m, as only three piles of tyre stacks will be stored at the premises at any one time. the heavy weight of the tyres and the square shaped cradle holding conveyor belts will naturally prevent a burning tyre or conveyor belt rolling into and igniting an adjacent stack. Installation of a fire hydrant system designed in compliance with AS2419.1-2005 and DFES guideline GN2 designed to operate 3 hydrants at 10 L/sec each (30 L/sec total) for a minimum of 4 hours. External tyre and conveyor belt storage: • Tyres and conveyor belts to be stored on a hardstand pad. • Conveyor belts to be stored in a cradle. • Stacks are to be no more than 3.7m high with a maximum 12.5 tonnes of tyres or conveyor belts stored in any single stack. • Stacks may be grouped together provided a separation distance between each stack of 2.5m is achieved, with each group not to exceed 50 tonnes. • A minimum of 6 m clear around each group of stacks shall be provided. • Stacks to be 18m away from combustible material and site boundaries, unless shielded by a non-combustible structure (i.e steel fence), except for the dome structure which may be located between 6-18m of the stacks.

Sources	Emission	Potential pathways	Proposed controls
			Internal tyre storage: • Limited to 4 whole tyres or 4 cradles of conveyor belts (2 on machines and 2 on floor awaiting reprocessing) at any one time. • Cut rubber to be stored within the delivery truck awaiting dispatch from site. Management controls: • Hot works (welding, grinding, oxygen cutting) to be undertaken in a planned manner with tyres moved away so they are no closer than 18 m during hot works events. • Electrical equipment shall be installed in accordance with AS3000, including AS61439 and will be tested and tagged in accordance with AS/NZS 3760:2010, with switchboards undergoing thermal graphic imagery scanning at least once a year to minimise the risk of faults and electrical fires. • Staff training to manage fire events. One person per shift trained in the use of the fire hose reel and portable fire extinguisher systems. To assist in early suppression prior to brigade arrival should a fire event occur. • As a minimum, one person per shift shall be available to move unburnt tyre stacks. • Fire systems shall be maintained in accordance with AS1851.
Receipt, handling, storage and shredding of used tyres and conveyor belts	Contaminated firefighting water and/or stormwater	Overland flow Subsurface seepage	• Design based on *Guidance Note: GN02 Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres* (DFES 2020). • Designed and constructed to retain 432,000 L of contaminated firefighting water within the hardstand yard area and asphalt bund walls of the premises which are both impermeable to ≤1x10^{-9} m/sec • The stormwater drainage system contains automatic shut off valves connected to the fire detection system to close during fire events and retain

Sources	Emission	Potential pathways	Proposed controls
			contaminated firewater within the hardstand of the premises. • Contaminated firewater to be disposed of offsite by a licensed contractor.
Receipt, handling, storage and shredding of used tyres and conveyor belts	Uncontaminated Stormwater	Overland flow Subsurface seepage	• The existing stormwater swale located at the north west corner has been expanded by design to retain uncontaminated stormwater equivalent to a one in five-year ARI with a 6 minute duration rainfall event. • The stormwater swale is located outside the firewater retention walls, yet within the premises boundary. • The stormwater drainage system will contain automatic shut off valves that will remain open during normal operations to enable uncontaminated stormwater to discharge to the swales. • For storm events greater than a 1 in 5-year storm, stormwater is expected to overflow to the floodplains to the north east of the site.
Receipt, handling, storage and shredding of used tyres and conveyor belts	Hydrocarbon spills during refuelling	Overland flow Subsurface seepage	• Mobile equipment will be refuelled by a scheduled mobile truck delivery. No fuel or diesel will be stored onsite. • Designated LPG storage areas onsite. Storage quantities do not exceed the threshold for dangerous goods licence requirements. • Minor quantities of grease and oil will be stored inside the dome in a designated storage area with appropriate bunding, for servicing and maintenance of the plant and equipment. • Spill kits will be available and staff trained for response.

3.1.2 Receptors

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

Table 2 below provides a summary of potential human and environmental receptors that may be impacted because of activities upon or emission and discharges from the prescribed premises *(Guideline: Environmental Siting* (DWER 2020)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from prescribed activity**
Residential premises	3.2 km south of premises boundary
Industrial premises	Immediately surrounding the premises.
Environmental receptors	**Distance from prescribed activity**
RIWI Act Surface Water Areas	Within the Pilbara Surface Water Area
Hydrography	Major tributary located 830 m west of premises boundary
Threatened and Priority Fauna	There are four threatened and priority fauna within 1 km of the premises boundary, including: • one occurrence of a Priority 3 reptile; • four occurrences of a bird species of migratory importance; and • four occurrences of a bird species of migratory importance.

3.2 Risk ratings

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

Where the applicant 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 applicant'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 applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Licence L3000/2025/1 that accompanies this amendment report authorises emissions associated with the operation of the premises.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 3: Risk assessment of potential emissions and discharges from the premises during operation

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Operation								
Receipt, handling, storage and shredding of used tyres and conveyor belts	Dust	Air/windborne pathway causing impacts to health and amenity	Surrounding industrial receptors	See Section 3.1	C = Slight L = Unlikely **Low Risk**	Yes	Condition 1, 3	Dust generation from additional the activities on site is likely to be minimal. The Delegated Officer considers that the provisions of section 49 of the EP Act (causing pollution and unreasonable emissions) is sufficient to regulate dust emissions from activities on site.
	Noise	Air/windborne pathway causing impacts to health and amenity	Surrounding industrial receptors	See Section 3.1	C = Slight L = Unlikely **Low Risk**	Yes	Condition, 1, 3	The Delegated Officer notes the addition of an excavator and shears to the premises. The additional equipment is unlikely to significantly increase the noise levels at the premises. Unreasonable emissions of noise will be regulated under the *Environmental Protection (Noise) Regulations 1997*.
	Unauthorised fires – smoke and fire	Air/windborne pathway causing	Surrounding industrial	See Section	C = Severe L = Unlikely	Yes	Condition 3, 4, 5	The Delegated Officer considers the existing licence controls are sufficient to

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	spread	impacts to surrounding vegetation and fauna	receptors Residential receptors	3.1	**High Risk**			prevent unauthorised fires occurring under most circumstances. The Delegated Officer also notes that the amount of tyres stored on site at any one time is not increasing.
	Contaminated firefighting water and/or stormwater	Overland flow Subsurface seepage Causing impacts to groundwater sources	Pilbara Surface Water Area	See Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Yes	Condition 6	The Delegated Officer considers the existing licence controls are sufficient to prevent emissions of contaminated firefighting water and/or stormwater occurring under most circumstances.
	Hydrocarbon spills during refueling	Overland flow Subsurface seepage Causing impacts to groundwater sources	Pilbara Surface Water Area	See Section 3.1	C = Slight L = Unlikely **Low Risk**	Yes	Condition 7, 8	The Delegated Officer considers the existing licence controls are sufficient to prevent hydrocarbon spills occurring under most circumstances.

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

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

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Applicant was provided with draft documents (23/04/2026)	Email received from the applicant on 30 April 2026 advising that they were happy with the draft licence and wish for it to be finalised.	N/A

5. Conclusion

Based on the assessment in this amendment report, the delegated officer has determined that a licence amendment will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 5: Summary of licence amendment

Revised licence condition	Proposed amendments
Cover page	Increase to Category 61A from 12,000 tonnes per annum to 20,000 tonnes per annum
Condition 1, Table 1	Additional processing equipment added to Tabel 1
Condition 2, Tabel 2	The restriction of 3,000 tonnes per annum of conveyor belts removed from Table 2 and included within the Category 61A total. Change to Table 2 format to reflect changes
Condition 3, Table 3	‘Inert Waste Type 1’ corrected to ‘Inert Waste Type 2’
Condition 9, Table 4	Inert Waste Type 1 corrected to Inert Waste Type 2

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.