



Application for Licence Amendment

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

Licence Number	L7200/1997/10
Licence Holder	Cleanaway Pty Ltd
ACN	000 164 938
File Number	DWERVT16239
Premises	Gordon Road Transfer Station LOT 300 ON PLAN 401608 Corsican Place PARKLANDS WA 6180 As defined by the Premises maps attached to the Revised Licence
Date of Report	27 November 2024
Decision	Revised licence granted

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

Table of Contents

1. Decision summary	1
2. Scope of assessment	1
2.1 Regulatory framework	1
2.2 Application summary	1
3. Risk assessment	2
3.1 Source-pathways and receptors	2
3.1.1 Emissions and controls	2
3.1.2 Receptors	3
3.2 Risk ratings	6
4. Consultation	9
5. Conclusion	9
5.1 Summary of amendments	9
References	11
Appendix 1: Summary of Licence Holder’s comments on risk assessment and draft conditions	12
Table 1: Licence Holder controls	3
Table 2: Sensitive human and environmental receptors and distance from prescribed activity	3
Table 3. Risk assessment of potential emissions and discharges from the Premises during construction and operation	7
Table 4: Consultation	9
Table 5: Summary of licence amendments	9
Figure 1: Distance to sensitive receptors	5

1. Decision summary

Licence L7200/1997/10 is held by Cleanaway Pty Ltd (Licence Holder) for the Gordon Road Transfer Station (the Premises), located on Lot 300 on Deposited Plan 401608, Parklands.

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 L7200/1997/10 has been granted.

The Revised Licence issued as a result of this amendment consolidates and 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 Application summary

On 9 September 2024, the Licence Holder submitted an application to the department to amend Licence L7200/1997/10 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). Following review of the Gordon Road Transfer Station - Fire and Emergency Management Plan (FEMP) by the operations team and independent fire consultants, Cleanaway has revised the FEMP. The FEMP captures the proposed changes in fire services throughout the site. As a result, the following licence amendments are being sought to incorporate updates to the FEMP and upgrades to fire controls:

- Updating the Fire and Emergency Management Plan (FEMP) to include:
 - Upgrades to the fire hydrant system;
 - Updates to the recycling building layout and recycling waste stockpile size limits/clearances;
 - Updates to the description of fire hydrant provisions to buildings post upgrade, including a revised location for the hydrants near the waste transfer shed and bulk waste areas;
 - Updates to include notifying DFES that the recycling shed has limited permanent bunding and will require portable bunding if hydrants are used;
 - Inclusion of commentary regarding the expected holding duration for firewater within the recycling shed if DFES deploy the hydrants; and
 - Inclusion of a fire hydrant system upgrade figure
- Amendment to condition 4(c) to increase the minimum distance between waste stockpiles from 6 m to 10 m
- Amendment to condition 4(d) to change “co-mingled waste stockpiles” to “eastern waste stockpile” and include the allowance of an increase in the length of the stockpile along the eastern sidewall to 5 m from the front face of the shed
- Amendment to condition 4(e) to change “cardboard waste stockpiles” to “western waste stockpile” and decrease the maximum length from 17.5 m to 10 m. The licence

holder has also requested the allowance of an increase in the length of the stockpile along the western sidewall to 5 m from the front face of the shed

- Amendment to condition 20(a) to update the version number of the FEMP

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 fire system upgrades construction and operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Licence Holder controls

Source	Emission	Potential pathways	Proposed controls
Construction			
Upgrade to fixed on-site fire hydrant system: <ul style="list-style-type: none"> • 2x 85kL fire hydrant storage tanks • dual diesel fire pump sets • fire brigade booster • in-ground fire service reticulation • external fire hydrants 	Noise	Air/windborne pathway	None proposed
Operation			
Fire	Fire debris and wash water	Overland runoff	Existing licence controls under condition 20. Additional proposed controls to prevent and control fire include: <ul style="list-style-type: none"> • increased separation distances between stockpiles in the Recycling Shed • reduced length of stockpiles in the Recycling Shed • upgrading the fire hydrant system • the use of portable bunding to contain fire wash water
	Smoke and particulates	Air/windborne pathway	
	Fire embers		

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

Human receptors	Distance from activity / prescribed premises
Residential Premises	The closest residences are: ~150 m northwest of premises boundary ~210 m east of premises boundary

Meadow Springs Reserve sports ground	~140 m west of premises boundary
RAAFA Estate Meadow Springs	~360 m west of premises boundary
Frederick Irwin Anglican School	School oval is approximately 350 m southwest from the premises boundary
Greyhounds WA track	~650 m south of premises boundary
Murdoch University Peel Campus	~1 km south of the premises boundary
Environmental receptors	Distance from activity / prescribed premises
Native vegetation	2 Western Australian Herbarium specimen species within 2 km of the premises.
Threatened fauna	Black cockatoo roost sites within 2 km of premises boundary. Threatened species within 2 km.
Underlying groundwater	Premises is within the Proclaimed South West Coastal Groundwater Area. Groundwater is 6.71 mbgl. Salinity is 500-1000 mg/L (DWER, <i>Perth Groundwater Map</i>).
Serpentine River	~1.25 km southeast of premises boundary.
Goegrup Lake Nature Reserve	~1.18 km southeast of premises boundary.
Environmentally Sensitive Areas	2 within 2 km of premises boundary.
Threatened Ecological Communities (TECs)	20 within 2 km of the premises boundary. Premises is within the buffer zones of 3 TECs.
Cultural receptors	Distance from activity / prescribed premises
Aboriginal heritage sites	ID 3582 – Serpentine River. Boundary of the heritage site is approximately 580 m east of premises boundary. And ID 17984 – Goegrup Lake. Boundary of the heritage site is approximately 580 m east of the premises boundary.

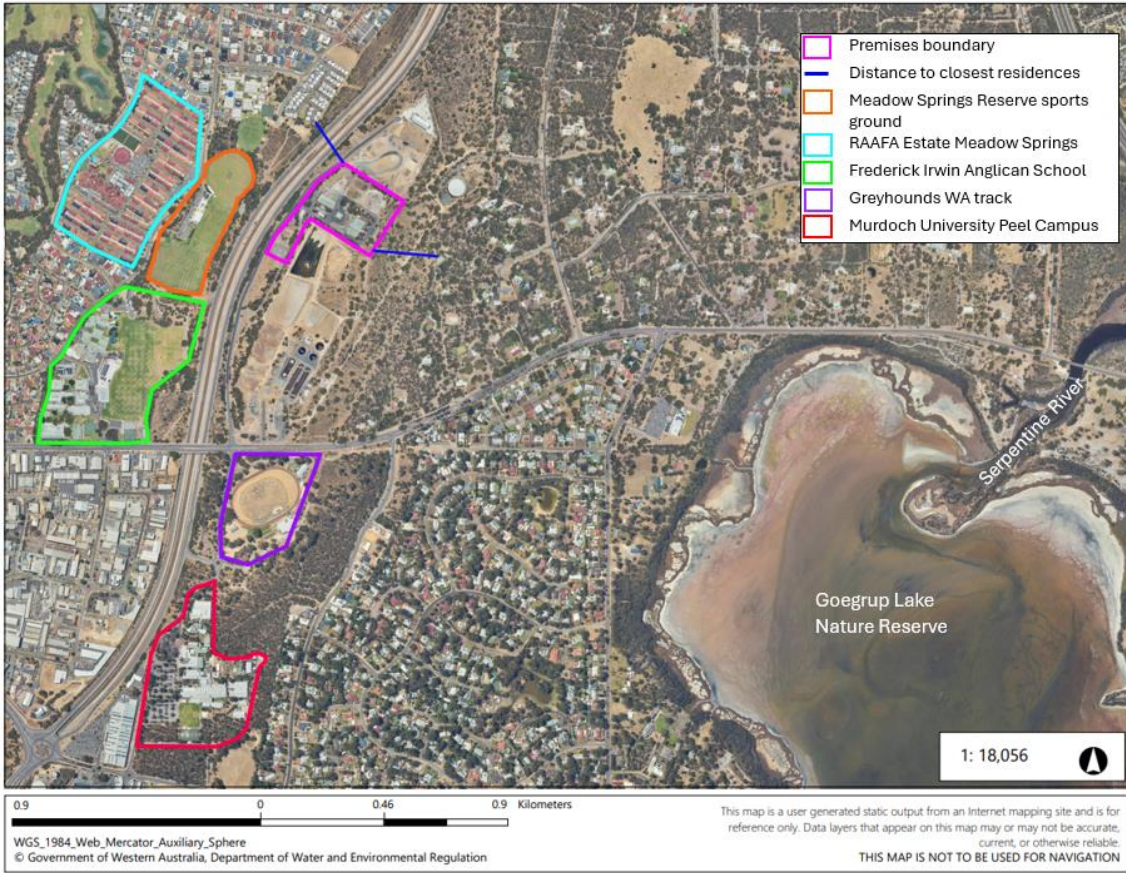


Figure 1: Distance to sensitive receptors

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 3.

The Revised Licence L7200/1997/10 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. upgrading fire control infrastructure.

The conditions in the Revised Licence 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 construction and operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Construction								
Upgrade to fixed on-site fire hydrant system: <ul style="list-style-type: none"> • 2x 85kL fire hydrant storage tanks • dual diesel fire pump sets • fire brigade booster • in-ground fire service reticulation • external fire hydrants 	Noise	Pathway: Air/windborne pathway Impact: impacts to amenity	Human receptors as listed in section 3.1	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	N/A	N/A Noise emissions to comply with the Environmental Protection (Noise) Regulations 1997	N/A
Operation								
Fire	Fire debris and wash water	Pathway: Overland runoff Impact: Ecosystem disturbance or impact to surface/ground water quality	Native vegetation Threatened fauna Underlying groundwater Serpentine River Goegrup Lake Nature Reserve ESAs TECs	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes	Condition 20	N/A

Risk Event					Risk rating ¹	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood			
	Smoke and particulates	Pathway: Air/windborne pathway Impacts: Health, amenity and ecosystem disturbance	Human receptors as listed in section 3.1 Threatened fauna	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes	Condition 20	N/A
	Fire embers		Human receptors as listed in section 3.1 Native vegetation ESAs TECs		C = Moderate L = Unlikely Medium Risk	Yes	Condition 20	N/A

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

Table 4: Consultation

Consultation method	Comments received	Department response
Local Government Authority (City of Mandurah) advised of proposal on 16 October 2024 [DWERDT1021206].	The City of Mandurah responded on 31 October 2024 [DWERDT1030223] advising the City owns the land for the Gordon Road Transfer Station and Cleanaway is the licensee. The City confirmed the proposed upgrades are fully initiated, funded and supported by the City of Mandurah, and the project aligns with the City's Town Planning Scheme.	N/A
Department of Fire and Emergency Services (DFES) advised of proposal on 8 October 2024 [DWERDT1017407].	DFES responded on 28 October 2024 [DWERDT1028472]. Refer to Appendix 1.	Refer to Appendix 1.
Licence Holder was provided with draft amendment on 15 November 2024 [DWERDT1037100]	The licence holder responded on 26 November 2024 [DWERDT1041884]. 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 5 provides a summary of the proposed amendments and will act as 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 amendments

Condition no.	Proposed amendments
Cover page	DWER file number updated from 2010/008332-1~3 to DWERVT16239. Typographical error in the Prescribed premises category description table corrected: The word "Category" added in front of 61A.
Licence history	Current amendment details added.
4(c)	Increase in the separation distance between stockpiles in the Recycling Shed from 6 m to 10 m.

4(d) and (e)	<p>Removal of reference to “co-mingled” and “cardboard” waste stockpiles. Instead, reference is to “waste stockpiles”.</p> <p>Addition of specification that the rear push wall is at the southern elevation.</p> <p>Reduce the length of both stockpiles to 10 m.</p> <p>Addition of reference to figure 3.1 of Schedule 3.</p> <p>Inclusion of specification that the length of the stockpiles must maintain a minimum clearance of 5 metres from the face of the shed (northern elevation).</p>
20(a)	Update to the FEMP reference number from 301250570 to 301252010.
Schedule 3	Replacement of FEMP 301250570 with the updated FEMP 301252010.

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, *Perth Groundwater Map*. Available at: [Perth Groundwater Map](#) (Accessed 1 October 2024)
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

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

Condition	Summary of DFES's comments	Summary of Licence Holder's comments	Department's response
Schedule 3: Gordon Road Transfer Station Fire and Emergency Management Plan Ref: 301252010	Given the proposed upgrades, a building permit / certificate of design compliance and thus a formal lodgement via a Development Approval will be expected.	N/A	The upgrades have been approved by the LGA.
	Recommendations were made to confirm water storage capacity and compliant coverage to all buildings. Recommendations were also made to improve the plan, including updates to fire-fighting infrastructure locations.	<p>These comments and recommendations were provided to the licence holder, who confirmed sufficient water storage capacity and coverage.</p> <p>The recommendations have been considered by the licence holder, who advised any required changes will be incorporated in the FEMP at a later stage.</p>	N/A