



## Application for Licence Amendment

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

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<b>Licence Number</b>	L7303/1998/10
<b>Licence Holder</b>	Western Metropolitan Regional Council
<b>File Number</b>	DEC8923/1~3
<b>Premises</b>	West Metro Recycling Centre  60 Lemnos Street SHENTON PARK WA 6010  Legal description –  Part of Lot 11541 on Deposited Plan 189946  As defined by the coordinates in Schedule 2
<b>Date of Report</b>	10 August 2023
<b>Decision</b>	Revised licence granted

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A/MANAGER, WASTE INDUSTRIES  
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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# 1. Decision summary

Licence L7303/1998/10 is held by Western Metropolitan Regional Council (WMRC) (Licence Holder) for the West Metro Recycling Centre (the Premises), located at 60 Lemnos Street, Shenton Park.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during operation of the Premises. As a result of this assessment, Revised Licence L7303/1998/10 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence/Works Approval 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 12 April 2023, the Licence Holder submitted an application to the department to amend Licence L7303/1998/10 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments were sought:

- Amendment to hazardous waste infrastructure, process specifications and storage requirements; and
- Increase throughput capacity of hazardous waste, paint, waste oil, used batteries and e-waste.

WMRC is proposing to upgrade the existing household waste storage infrastructure at the premises. The upgrade to the infrastructure included the installation of a 20ft dangerous goods store. The store has been designed to meet Australian Standard for the storage of Class 3 flammable liquids, Class 4.1 (flammable solids only), Class 4.3 (Substances which in contact with water emit flammable gases), Class 5.1 oxidising agents, Class 6.1 toxic substances and Class 8 corrosive liquids. The store has spill containment provisions (Capacity of largest container plus 25% for vessels up to 10,000 L), ventilation and is of a steel construction.

As part of the application process, the WMRC has reviewed the throughputs for the premises and have applied to increase the waste acceptance and processing at the premises. Table 1 below outlines the proposed changes to the existing Licence.

**Table 1: Proposed throughput capacity changes**

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
62: Solid waste depot	155,500 tonnes per year	155,725 tonnes per year	Removal of combined throughput for Special Waste Type 1 and Hazardous Waste.  Addition of discrete waste type inputs for Special Waste Type 1, Used Batteries, Hazardous Waste, E-waste and Waste Oil.

In addition to the amendment requested by the applicant, a number of clerical errors were identified and resolved as part of the amendment. These clerical errors are outlined in Table 6

### 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
Leachate	Storage of hazardous waste.	Seepage to soils and groundwater	All hazardous waste storage will be undertaken within the new hazardous waste store. The store has been designed to meet Australian Standard for the storage of Class 3 flammable liquids, Class 4.1 (flammable solids only), Class 4.3 (Substances which in contact with water emit flammable gases), Class 5.1 oxidising agents, Class 6.1 toxic substances and Class 8 corrosive liquids. The store has spill containment provisions (Capacity of largest container plus 25% for vessels up to 10,000 L), ventilation and is of a steel construction.  Storage of paint and waste oil will remain unchanged.
Leachate	Storage of e-waste	Seepage to soils and groundwater	Located on hardstand area.
Fire/smoke	Storage of incompatible waste types, used batteries, e-waste and waste oil	Air/windborne pathway	Hazardous wastes will be stored in accordance with dangerous goods requirements. The existing dangerous goods cabinets will be transferred to the new dangerous goods store. The store has been designed to meet Australian Standard for the storage of Class 3 flammable liquids, Class 4.1 (flammable solids only), Class 4.3 (Substances which in contact with water emit flammable gases), Class 5.1 oxidising agents, Class 6.1 toxic substances and Class 8 corrosive liquids.

Emission	Sources	Potential pathways	Proposed controls
			Waste oil and paints are stored separately from hazardous wastes in a self-bunded undercover area.

### 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	Approximately 700m southwest of the Prescribed Premises boundary
Water Corporation wastewater treatment plant	Northern side of Lemnos Street
Sports ovals	285m northwest of the Prescribed Premises
Department of Defense – Army base	Adjacent to the eastern and southern boundary of the Prescribed Premises
Perth Transit bus depot	West of the Prescribed Premises, other side of Brockway Road
Environmental receptors	Distance from prescribed activity
Bush Forever Site 218 – Shenton Bushland	475m east of the Prescribed Premises boundary
Bush Forever Site 119 – Underwood Avenue Bushland	700m north east of the Prescribed Premises boundary
Bush Forever Site 312 – Bold Park and Adjacent Bushland DBCA Managed Lands and Waters – Bold Park	1.25km west of the Prescribed Premises boundary
Threatened Ecological Community – Banksia Dominated Woodlands of the Swan Coastal Plain	Three occurrences of this TEC with 15m of the Prescribed Premises Boundary (south and east)
Groundwater	Estimated to be greater than 5m below ground level
<i>Rights in Water and Irrigation Act 1914</i> – Perth Groundwater Area	Prescribed Premises is located within this proclaimed area.

## 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 in-complete 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 L7303/1998/10 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

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 during operation**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Storage of hazardous waste, used lead acid batteries, waste oils, paints, e-waste	Spills / leaks	Overland runoff potentially causing ecosystem disturbance or impacting stormwater quality Seepage into underlying soils causing localised contamination.  Infiltration into groundwater potentially causing ecosystem disturbance or impacting groundwater quality.	Threatened ecological community located 15m south and east of the prescribed premises boundary.  Soil and groundwater beneath the site	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	N	Condition 1-5 <b><u>Condition 22</u></b>	The proposed amendments do not alter the risk assessment as previously assessed for the acceptance and storage of hazardous waste, used lead acid batteries, waste oil, paint, and e-waste  The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating emissions from leaks/spills.  Conditions have been added to the licence to require e-waste to be accepted and stored in accordance with the requirements of AS/NZS 5377:2013.

Risk Event					Risk rating <sup>1</sup>	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood			
Stormwater coming into contact with waste material on site	Contaminated stormwater	Seepage into underlying soils causing localised contamination.  Overland flow to stormwater infrastructure and infiltration to groundwater causing ecosystem disturbance or impacting groundwater quality.	Threatened ecological community located 15m south and east of the prescribed premises boundary.  Soil and groundwater beneath the site.	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Condition 1-5 <b>Condition 22</b>	The proposed amendments do not alter the risk assessment as previously assessed for the acceptance and storage of hazardous waste, used lead acid batteries, waste oil, paint, and e-waste  The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating emissions from contaminated stormwater.  Conditions have been added to the licence to require e-waste to be accepted and stored in accordance with the requirements of AS/NZS 5377:2013.
Fugitive emissions from fire event	Fire debris and washwater	Seepage into underlying soils causing localised contamination  Overland flow to stormwater infrastructure and infiltration to groundwater causing ecosystem disturbance or impacting groundwater quality	Threatened ecological community located 15m south and east of the prescribed premises boundary.  Soil and groundwater beneath the site.	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Condition 1-5 Condition 22	The proposed amendments do not alter the risk assessment as previously assessed for the acceptance and storage of hazardous waste, used lead acid batteries, waste oil, paint, and e-waste.  The Delegated Officer considers that the Applicant's proposed



Risk Event					Risk rating <sup>1</sup>	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood			
Fugitive emissions from fire event	Fire/smoke	Air / windborne pathway causing impacts to health and amenity	Residential properties located 700m southwest of the premises. Industrial properties located to the north and west of the premises. Public open space (sports ovals) located 285 m northwest of the premises. Department of Defence Army Base located to the east and south of the premises.	Refer to Section 3.1	C = Major L = Unlikely <b>Medium</b>	Y	Condition 1-5 Condition 22	controls are likely to be sufficient at mitigating emissions from fire events.

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
Local Government Authority advised of proposal on 11 May 2023	The City of Nedlands replied on 9 June 2023 requesting that any changes to the infrastructure and operations at this facility that are approved by the Department do not adversely impact the amenity of the area and provide adequate emergency fire or spill or contamination protection.	This decision report outlines the risk assessment of the proposed amendments to the licence. Where it is deemed necessary, additional regulatory controls have been placed on the licence to prevent emissions and discharges from the premises.
Licence Holder was provided with draft amendment on 10 July 2023	The licence Holder responded via email confirming there were no comments on the draft licence amendment package.	N/A

## 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 Revised Licence as part of the amendment process.

**Table 6: Summary of licence amendments**

Condition no.	Proposed amendments
N/A	Amend assessed design capacity in accordance with proposed throughput. Increase from 155,500 tonnes per annual period to 155,725 tonnes per annual period.
Condition 4 Table 1	<p>Addition of a throughput for tyres per annual period. Removal of tyre processing specification from waste acceptance table.</p> <p>Removal of combined waste acceptance throughput for Special Waste Type 1 and Hazardous Waste.</p> <p>Addition of discrete waste type inputs for Special Waste Type 1, Used Batteries, Hazardous Waste, E-waste and Waste Oil.</p> <p>Increased throughput of hazardous waste, paint, waste oil, used batteries, and e-waste</p>
Condition 22 Table 2	<p>Removal of clerical errors identified in processing specifications of Inert Waste Type 1 and Inert Waste Type 2.</p> <p>Addition of tyre processing specification.</p> <p>Removal of the requirement that required the licence holder to store no more than 1360L (litres) of liquid and 1000kg of solid household chemical waste at any one time. This requirement has been update to ensure these wastes cannot be stored on the site for</p>

	<p>longer than 90 days.</p> <p>Addition of storage requirements for hazardous wastes, e-waste and waste oil.</p> <p>Requirement added to ensure that no more than 1,000 L of waste oil is stored on the premises at any one time.</p>
Condition 29 Table 3	Inclusion of additional waste types to inputs and output monitoring requirements.
Figure 4	Addition of figure identifying the hazardous waste, e-waste and waste oil storage area

## 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.

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY					
<b>Application type</b>					
Works approval	<input type="checkbox"/>				
Licence	<input type="checkbox"/>	Relevant works approval number:		None	<input type="checkbox"/>
		Has the works approval been complied with?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Has time limited operations under the works approval demonstrated acceptable operations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Date Report received:			
Renewal	<input type="checkbox"/>	Current licence number:			
Amendment to works approval	<input type="checkbox"/>	Current works approval number:			
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L7303/1998/10		
		Relevant works approval number:		N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None	<input type="checkbox"/>
Date application received	12 April 2023				
<b>Applicant and Premises details</b>					
Applicant name/s (full legal name/s)	Western Metropolitan Regional Council				
ACN	870276543				
Premises name	West metro Recycling Centre				
Premises location	60 Lemnos Street SHENTON PARK WA 6010				
Local Government Authority	City of Nedlands				
<b>Application documents</b>					
HPCM file reference number:	DWERDT764302				
Key application documents (additional to application form):	<ul style="list-style-type: none"> <li>• Dangerous Goods Single Side Door product specifications document.</li> </ul>				

	• Dangerous Goods Risk Assessment Report.	
<b>Scope of application/assessment</b>		
Summary of proposed activities or changes to existing operations.	Acceptance of hazardous waste under the HHW program and the acceptance of special waste type 1	
<b>Category number/s (activities that cause the premises to become prescribed premises)</b>		
<b>Table 1: Prescribed premises categories</b>		
<b>Prescribed premises category and description</b>	<b>Production or design capacity (Assessed – existing licence)</b>	<b>Proposed changes to the production or design capacity (amendments only)</b>
Category 62	155,500 tonnes per annual period	155,725 tonnes per annual period
<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"/>	N/A
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Existing prescribed premises
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	No planning approval included with the application. Stakeholder letter to be sent to the Shire
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"/>	No clearing required
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"/>	N/A

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"/>	N/A
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"/>	N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
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 checked="" type="checkbox"/> No <input type="checkbox"/>	<i>Environmental Protection (Unauthorised Discharges Regulations 2004, Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004</i>
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"/>	N/A
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"/>	N/A