



Application for Licence Amendment

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

Licence Number	L7384/1999/8
Licence Holder	SUEZ Recycling & Recovery (Welshpool) Pty Ltd
ACN	051 060 890
File Number	2010/006502-1
Premises	Welshpool Resource Recovery Park 116 Kurnall Road, WELSHPOOL WA 6106 Legal description – Lot 98 on Deposited Plan 2101 As defined by the coordinates in Schedule 1 of the Revised Licence
Date of Report	24 June 2022
Decision	Revised licence granted

Stephen Checker

MANAGER WASTE INDUSTRIES

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

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1. Decision summary

Licence L7384/1999/8 is currently held by West Australian Landfill Services Pty Ltd (Licence Holder) for the Welshpool Transfer Station (the Premises), located at 116 Kurnall Road, Welshpool.

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 L7384/1999/8 has been granted.

The Revised Licence issued as a result of this amendment supersedes the existing Licence previously granted in relation to the Premises. The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

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 22 December 2022, the Licence Holder submitted an application to the department to amend Licence L7384/1999/8 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Change Licence Holder to Suez Recycling & Recovery (Welshpool) Pty Ltd;
- Change Premises name to Welshpool Resource Recovery Park;
- Storage of compost; and
- Bale paper, cardboard and plastic.

The department sought additional information from the Licence Holder regarding the nature of the compost, whether it be a 'waste' or a 'product'. The Licence Holder provided a written response advising that an internal review was undertaken, and it was concluded that the AS 4454 quality compost produced at the North Bannister Resource Recovery Park is a product, not a waste. The storage of compost was consequently removed from the application.

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

Table 1: Proposed throughput changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
62	250,000 tonnes per annual period	295,000 tonnes per annual period	An additional 45,000 tonnes per annum of paper, cardboard and plastic which is to be baled, stored and sent offsite for recycling.

In amending the licence, the CEO has:

- updated the format and appearance of the Licence;
- deleted the redundant AACR form set out in schedule 1 of the previous licence and advise the Licensee to obtain the form from the department's website;
- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

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 1 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
Dust	Baling	Air/windborne pathway	Baling occurs within an enclosed shed.
Noise	Baling	Air/windborne pathway	Baling occurs within an enclosed shed.
Odour	Storage of putrescible waste (cardboard only)	Air/windborne pathway	A complaints register will be maintained. Storage occurs within an enclosed shed.

Fire	Baling and storage of waste	Air/windborne pathway	While paper, cardboard and plastic are combustible, there are minimal ignition sources available, these primarily being equipment electrical faults and excessive friction within moving parts. Typically, these risks are only relevant when the plant and equipment are operating, and the plant will be manned during these times. Smoke detectors linked to a fire panel with an automated call out to emergency services. Emergency Response Plan prepared for the Premises
Fire wash water	Extinguishing fires	Overland flow	Water resulting from a fire event on site would be contained to the leachate collection system. The leachate collection system water is pumped to the water treatment plant and disposed of through trade waste. Areas on the edge of site that do not receive contaminated water have storm water drains. The storm water drains could also be blocked or pumped out in the event of a fire.
Windblown litter	Unloading of paper and cardboard	Air/windborne pathway	Baling and storage and cardboard will occur with enclosed shed and the premises has litter nets.

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)).

The location of identified sensitive receptors in relation to the Premises are depicted in Figure 1 and Figure 2.

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

Human receptors	Distance from prescribed activity
East Cannington	Closest resident approximately 1.3 km south of the Premises
Wattle Grove	Closest resident approximately 1.8 km southeast of the Premises
Kewdale	Closest resident approximately 2 km northwest of the Premises
Environmental receptors	Distance from prescribed activity
Resource Enhancement Wetland	Approximately 150 m northeast of the Premises
Conservation Category Wetland (Palusplain)	Approximately 1.2 km east of the Premises

Department of Biodiversity, Conservation and Attractions managed lands – Dundas Road Nature Reserve	Approximately 2.3 km northeast of the Premises
Bush Forever – Site 424	Approximately 700 m south of the Premises
Banksia Dominated Woodlands of the Swan Coastal Plain Threatened Ecological Community	Approximately 350 m southeast of the Premises
Groundwater	Located at approximately 7.5 m below ground level



Legend

- Instruments - Licence

Notes

Author:
Recipient:

2.6 0 1.30 2.6 Kilometers

WGS_1984_Web_Mercator_Auxiliary_Sphere
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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

Figure 1: Distance to human receptors



Legend

- Instruments - Licence
- 4. Geomorphic Wetlands - Swan Coastal Plain (Management)
- Conservation
- Resource Enhancement
- Multiple Use**

Notes

Author:
Recipient:

1.3 0 0.65 1.3 Kilometers
WGS_1984_Web_Mercator_Auxiliary_Sphere
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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
THIS MAP IS NOT TO BE USED FOR NAVIGATION

Figure 2: Proximity to Environmental 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 .

The Revised Licence L7384/1999/8 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 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				
Operation								
Baling and storage of cardboard, paper and plastic	Dust	Air/windborne pathway causing impacts to health and amenity	Closest resident approximately 1.3 km south of the Premises	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 14	N/A
	Noise	Air/windborne pathway causing impacts to amenity	Closest resident approximately 1.3 km south of the Premises	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 14	N/A
	Odour	Air/windborne pathway causing impacts to health and amenity	Closest resident approximately 1.3 km south of the Premises	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Conditions 3 and 14	N/A
	Leachate	Infiltration through soil profile to groundwater causing potential impacts on ecological values of wetlands.	Resource Enhancement Wetland approximately 150 north east of the Premises.	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 3	N/A
	Contaminated stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Resource Enhancement Wetland approximately 150 north east of the Premises. Banksia	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 4	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			
			Woodland TEC approximately 350 m southeast. Bush Forever site 424 approximately 700 m south.					
	Fire - particulates and noxious gases (smoke)	Air/windborne pathway causing impacts to human and ecological health	Closest resident approximately 1.3 km south of the Premises. Banksia Woodland TEC approximately 350 m southeast. Bush Forever site 424 approximately 700 m south.	Refer to Section 3.1	C = Major L = Possible High Risk	Y	Conditions 3 , 7 and 9	Additional specifications relating to stockpile size and separation distances added to address the high risk of fire associated with the storage of baled material.
	Fire washwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Resource Enhancement Wetland approximately 150 north east of the Premises. Banksia Woodland TEC approximately 350 m southeast.	Refer to Section 3.1	C = Major L = Rare Medium Risk	Y	Condition 9	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			
			Bush Forever site 424 approximately 700 m south.					
	Windblown litter	Air/windborne pathway causing impacts to amenity	Banksia Woodland TEC approximately 350 m southeast. Bush Forever site 424 approximately 700 m south.	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 6	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 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of the application on 11 April 2022	No comments received	N/A
Licence Holder was provided with draft amendment	Appendix 1	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 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

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A – front page	Licence Holder: West Australian Landfill Services Pty Ltd	Licence Holder: SUEZ Recycling & Recovery (Welshpool) Pty Ltd	Updated at the request of the licence holder
N/A – front page	Premises name: Welshpool Transfer Station	Premises name: Welshpool Resource Recovery Park	Updated at the request of the licence holder
N/A – front page	Throughput capacity: 250,000 tpa	Throughput capacity: 295,000 tpa	Updated at the request of the licence holder
1.1.1 1.1.2	Interpretation and definitions	N/A Interpretation section, Definitions and Table 6	Redundant condition. Revised to current licensing format.
1.1.3	Australian or other standard	N/A	Redundant condition. Revised to current licensing format.
1.1.4	Reference to code of practice	N/A	Redundant condition. Revised to current licensing format.
1.1.1	Stormwater	Condition 4	New numbering
1.2.2	Waste acceptance	Condition 1	New numbering

Existing condition	Condition summary	Revised licence condition	Conversion notes
			Quantity limit updated
1.2.3	Removal of non-conforming waste	Condition 2	New numbering
1.2.4	Waste processing	Condition 3	New numbering Specifications added for baling
1.2.5	Prevention of pests	Condition 5	New numbering
1.2.6	Windblown waste	Condition 6	New numbering
1.2.7	No burning of waste	Condition 7	New numbering
1.2.8	Wastewater	Condition 8	New numbering
N/A	N/A	Condition 9	Given the high risk of fire associated with baling additional fire condition have been added to the licence.
1.2.9	Waste acceptance manual	N/A	Condition removed. Waste acceptance criteria is specified in condition 1
2.1.1	Monitoring equipment	Condition 10	New numbering
2.1.2	Calibration	Condition 11	New numbering
2.2.2	Monitoring of inputs and outputs	Condition 12	New numbering
3.1.1	Information and records	Conditions 16 and 17	Revised to current standard wording.
3.1.2	Copy of licence left at premises	Condition 13	New numbering
3.1.3	AACR	Condition 15	Revised to current standard wording. AACR template can be accessed at www.dwer.wa.gov.au
3.1.4	Complaints	Condition 14	Revised to current standard wording.
3.2.1	AER	-	Deleted as per 16 May 2022 amendment notice
3.3.1	Notifications	Condition 18	The requirement to report a breach of any limit specified in the licence has been removed. Any breach is now to be reported in the AACR.
Schedule 1	N/A	N/A	Site layout map added as Figure 2
Schedule 2	N/A	N/A	Boundary coordinates added

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

Draft Condition	Summary of Licence Holder's comment	Department's response
n/a	Draft Licence, Page 1 – Following the merge of Suez and Veolia on 22 March 2022, the registered business address has moved to Level 4, 65 Pirrama Road, Pyrmont, NSW, 2009. This decision to move offices was made after the submission of the amendment application, but it may be a good opportunity to amend. There are no further proposed changes to the Licence Holder or ACN	Noted and amended
3	Table 2 (Inert Waste Type 2) – Typographical error on 'cardboard	Noted and amended
	Table 2 (Inert Waste Type 2 and Putrescible Waste) – 'a minimum separation distance of at least 15 m of clear ground between each stockpile or other combustible wastes or structures.' Veolia request a reduction in the distance from 15 m to 10 m. A 10 m internal stockpile separation distance aligns with the DFES 'Guidance Note GN04: Fire Prevention and Management in a Recycling Facility' for non-sprinklered buildings.	Noted and amended
	Table 2 (Putrescible Waste) – Typographical error on "cardboard' and 'baling'.	Noted and amended
9 (a)	Request to remove reference to the site Emergency Response Plan and not to attach to the licence. Veolia propose rewording to a condition that requires the Licence Holder to maintain and implement a Fire Management Plan. The ERP contains commercial in confidence information and is regularly updated so will quickly become outdated if attached to the licence.	Noted and amended
18	As part of the Government's Streamline WA initiative, L7384/1999/8 was identified as a Licence where the submission of an Annual Environmental Report is no longer required. Veolia is not sure if there is a different process to amend licences, or whether this would be a good opportunity to remove this requirement.	Noted and amended (deleted)
Draft decision report	The decision report references a Vesda system in the baling shed, however a Vesda system is only in use in the transfer station shed. The baling shed has smoke detectors that are linked to a fire panel with an automated call out to emergency services	Noted and amended

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)				
Application type				
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:	L7384/1999/8	
		Relevant works approval number:	N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:	None	<input type="checkbox"/>
Date application received		22/12/2021		
Applicant and Premises details				
Applicant name/s (full legal name/s)		West Australian Landfill Services Pty Ltd Requesting to change name to: SUEZ Recycling & Recovery (Welshpool) Pty Ltd		
Premises name		Welshpool Transfer Station Requesting to change name to: Welshpool Resource Recovery Park		
Premises location		116 Kurnall Road, Welshpool		
Local Government Authority		City of Canning		
Application documents				
HPCM file reference number:		2010/006502-1~1		
Key application documents (additional		Licence Amendment Application Supporting Documentation		

to application form):		
Scope of application/assessment		
Summary of proposed activities or changes to existing operations.	<ul style="list-style-type: none"> • Change Licence Holder name to SUEZ Recycling & Recovery (Welshpool) Pty Ltd • Change Premises name to Welshpool Resource Recovery Park • Include bailing of paper, cardboard and plastic • Include storage of compost 	
Category number/s (activities that cause the premises to become prescribed premises)		
Table 1: Prescribed premises categories		
Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 62: Solid waste depot	250,000 tpa	295,000 tpa
Legislative context and other approvals		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:

Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Approval: Expiry date: If N/A explain why?
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Type: N/A Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Regional office: Swan Avon / Mid-West Gascoyne / Kwinana Peel / North West / South West / Goldfields / South Coast
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
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

<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Classification: N/A Date of classification: N/A</p>
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