Amendment Report

Application for Licence Amendment

Part V Division 3 of the Environmental Protection Act 1986

Licence Number L7639/2000/8

Licence Holder Western Resource Recovery Pty Ltd

ACN 099 144 180

File Number APP-0028126

Premises Western Resource Recovery

113 Ewing Street

WELSHPOOL WA 6106

Legal description -

Lot 278 on Plan 3033 As defined by the premises map

attached to the revised licence

Date of Report 14/08/2025

Decision Revised licence granted

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

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1. Decision summary

Licence L7639/2000/8 is held by Western Resource Recovery Pty Ltd (licence holder), a fully owned subsidiary of Veolia Environmental Services (Australia) Pty Ltd, for Western Resource Recovery (the premises), located at 113 Ewing Street, 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 L7639/2000/8 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

The vast majority of the site waste management activities relate to the receival, processing and disposal of a range of liquid waste materials. In addition, the facility also deals with small quantities of solid waste materials.

On 21 March 2025, the Licence Holder submitted an application to the department to amend Licence L7639/2000/8 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- 1. Receival, handling and removal of:
 - asbestos containing material (ACM);
 - ceramic based fibres; and
 - electronic cigarettes (e-cigarette).
- 2. Processing of electronic cigarettes:
 - E-cigarettes are proposed to be dismantled into various components prior to consolidation, and storage prior to removal from the site. This activity is proposed to occur in existing site sheds.

Table 1 below outlines how the proposed changes relate to the prescribed premises categories.

Table 1: Proposed changes to prescribed premises categories

Category	Current throughput capacity	Description of proposed amendment
Category 61: Liquid waste facility	Up to 100,000 tonnes per annual period	No proposed change to approved category 61 activities.
Category 62: Solid waste depot	Up to 550 tonnes per annual period	Proposed acceptance and handling of asbestos, ceramic fibres and e-cigarettes (up to 5 tonnes each per annum). An increase in the current throughput capacity is not required. Asbestos and ceramic fibre material is proposed to be stored in sealed 240L drums with watertight lids, and the e-cigarettes will be processed and stored within an existing shed on site.

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
Asbestos and ceramic fibres	Acceptance and handling of asbestos and ceramic fibres materials	Air/ windborne pathway	ACM and ceramic fibres will only be accepted onsite with prior arrangement. Large ACM and ceramic fibre material will be double wrapped in heavy duty black plastic or sealed in heavy duty plastic bags (minimum 200 µm thickness) by the customer prior to delivery to the premises. For smaller items, the material can be double bagged in sturdy plastic bags and sealed with tape. Asbestos or ceramic fibre contaminated soil or fines, are to be received damp (not saturated) and packaged in suitable sealed containers or double bagged. Wrapped material will be unloaded directly into 240L drums, which will be then sealed and moved to a temporary storage area. Sealed drums will be removed from site to an appropriately licensed disposal facility by a flat-bed truck. Licence holder has developed an Asbestos and Ceramic Fibre Management Plan.
Uncontrolled discharge of liquid wastes Fire (smoke) (potentially	Storage, dismantling and reprocessing of e-cigarettes	Overland runoff of contaminated stormwater and seepage to soils and groundwater Air/ windborne	All handling, storage of whole e-cigarettes or dismantling and storage of component parts of e-cigarettes will occur within the existing site sheds. 205L sealed steel drums will be used to store the e-cigarettes before being dismantled. Once dismantled, the various benign components (plastic, cardboard, metal, electronic circuitry) will be stored in open bins, the e-cigarettes chemical cartridges will be stored in 205L sealed steel drums, with the batteries to be stored in a dedicated, sealed metal
from batteries)		pathway	battery bin. The licence holder has provided a Site Emergency Response Plan detailing how fire risk will be managed.

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
Light industrial premises (Ewing and Radium Streets, Welshpool)	Immediately adjacent to northern (industrial units,) eastern (industrial units) and southern (Horizon West Bus Charters) premises boundaries
Radium Lunch Bar, 2/126-128 Radium Street, Welshpool	Approximately 140m southeast of eastern premises boundary
Bentley Residential Area (Merian Close, Bentley)	Approximately 420 m south of the southern premises boundary
Queens Park Residential Area (Mills Street, Queens Park)	Approximately 500m southeast of the southern premises boundary - down hydraulic gradient
Environmental receptors	Distance from prescribed activity
Threatened Ecological Community - Priority 3 Endangered Banksia Woodlands of the Swan Coastal Plain ecological community	Immediately abutting northern premises boundary
RIWI Act - Perth Groundwater Area	The premises lies within the proclaimed Perth Groundwater Area.
Water Corporation Stormwater Catchment, to the rear of 133 Welshpool Rd, Welshpool	Immediately abutting northern premises boundary
Water Corporation compensating basin between Radium Street and Mills Road, Queens Park	Approximately 300m east of premises boundary-down hydraulic gradient

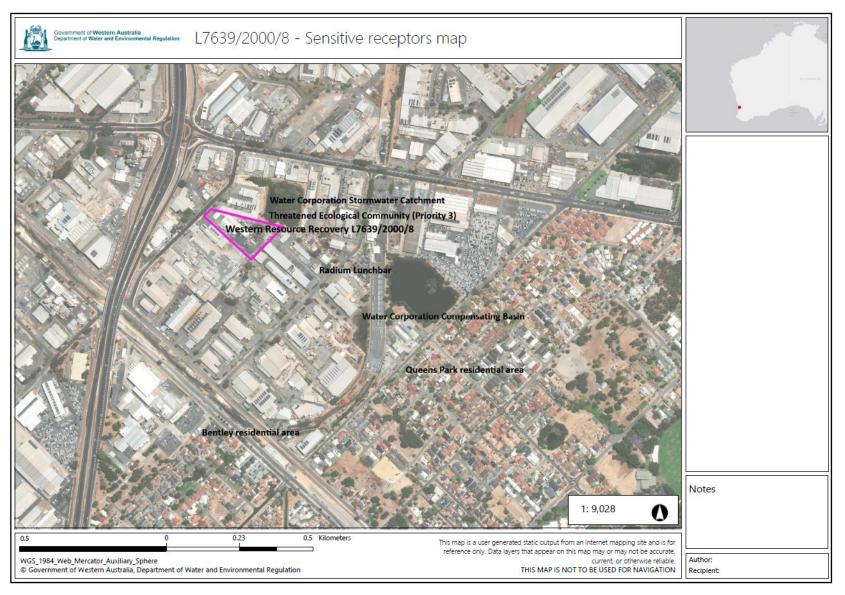


Figure 1: Distance to sensitive receptors

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 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 L7639/2000/8 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 operation

Risk Event					Risk rating ¹ Lic	Licence		
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood	Holder's controls sufficient?	Conditions of licence	Justification for additional regulatory controls
Acceptance, handling and storage of asbestos and ceramic fibres	Asbestos and ceramic fibres	Air/ wind dispersion resulting in human health impacts (noxious particulates)	Light industrial premises adjacent to premises; Lunch bar 140 m SE of premises	Refer to Section 3.1	C = Major L = Possible High Risk	Y	Conditions 1 – 5, and 16	Existing licence conditions 1 - 4 relate to the acceptance, processing and infrastructure requirements of materials authorised at the premises. These conditions refer to Appendix A, Table 1, which specifies the conditions of all authorised material types. Therefore, Table 1 has been amended to include requirements for asbestos, ceramic fibres and e-cigarettes. Existing licence condition 12 requires the licence holder to monitor the weight/volume and frequency of each waste type (as stipulated in Table 1) accepted onto the premises. There is an increase in risk of fire with the acceptance and handling of lithium-ion batteries (from e-cigarettes), and so the delegated officer has added a condition set (Fire and Emergency Management) to the licence to mitigate the risk.
Acceptance, handling and dismantling of e-cigarettes	Uncontrolled discharge of liquid wastes	Overland runoff of contaminated stormwater and infiltration into soil, resulting in potential impacts to groundwater users, surface water quality and ecosystem disturbance	Threatened Ecological Community – Priority 3 Endangered Banksia Woodlands of the Swan Coastal Plain at northern boundary of premises; Stormwater catchment at northern boundary of premises; Compensation basin 300m east of premises	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Conditions 1 – 7	
	Uncontrolled fire (smoke) (potentially from batteries)	Air /wind dispersion resulting in human health impacts (smoke inhalation, noxious particulates)	Light industrial premises adjacent to premises; Lunch bar 140 m SE of premises; Residential areas (Merian Close, Bentley ~ 420 m south, and Mills Street, Queens Park ~ 500 m southeast of premises)	Refer to Section 3.1	C = Major L = Possible High Risk	Y	Conditions 1 – 5 Condition 8	

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

Note 2: Proposed applicant controls and existing conditions are depicted by standard text. **Bold and underlined 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 (City of Canning) advised of proposal (18 June 2025)	None received	N/A
Licence holder was provided with draft amendment on 13/08/2025	Licence holder responded on 13/08/2025 via email, requesting to waive the consultation period, and issue the amendment as soon as possible.	Issued licence amendment.

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 number/ section of licence	Proposed amendments				
Conditions 8	Fire and emergency management condition set added.				
Figure 3	Additional premises layout figure added				
Appendix A, Table 1 (Waste acceptance, processing and storage)	Addition of: • Asbestos and asbestos containing materials; • Ceramic fibres; and • Waste pharmaceuticals, drugs and medicines – e-cigarettes only				

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.