



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	2012/003338-1~2
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	17 October 2023
Decision	Revised licence granted

Abbie Crawford
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 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

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>.

Application summary

Established in 2007 and formerly known as Total Waste Management Pty Ltd, Western Resource Recovery receives a broad range of liquid and solid waste for treatment and transfer. The primary activity at the Premises is treatment of septage and grease trap waste via Dissolved Air Floatation (DAF) for the removal of suspended solids, oils, greases, BOD, COD, and metals. Previously the Licence Holder has transferred liquid waste from the truck unloading area to series of four flat-bottomed 12,000L settlement tanks for further processing via DAF.

On 20 July 2023, 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:

- Amend the approved production/design capacity to 100,000 tonnes per annual period via the addition of 4 x 25,000L conical settlement tanks; and
- Addition of amended tank farm bund including layout, dimensions and capacity; to accommodate addition of settlement tanks as above (Schedule 1 maps within the licence).

Increased settlement tank capacity is proposed to optimise throughput within the DAF process due to more efficient separation and cleaner water being fed to the DAF mechanical treatment stage. Greater volumes and increased settlement times are proposed to improve liquid waste quality within the new tanks allowing some portion of the liquid waste to bypass the DAF plant for direct disposal to sewer, where appropriate test results are met under the trade waste permit.

Table 1 below outlines the proposed throughput changes to the existing licence.

Table 1: Proposed capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
Category 61: Liquid waste facility: premises on which liquid waste produced on other premises (other than sewage waste) is stored, reprocessed, treated or irrigated	55,000 tonnes per annum	100,000 tonnes per annum	45,000 tonne increase in throughput in response to industry demand. Mainly applicable for septage and grease trap waste.
Category 62: Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use	550 tonnes per annum	550 tonnes per annum	No change

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.

Source-pathways and receptors

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
Odour	DAF plant	Airborne pathway/wind	Scrubber system on site as part of pollution control equipment. New settlement tanks are sealed to contain odour and located inside the DAF plant shed.
Noise	From machinery operations and/or	Airborne	Hours of operation will remain Mon-Fri 6am-5pm and Sat and Sunday shifts as

Emission	Sources	Potential pathways	Proposed controls
	vehicle operations	pathway/wind	required. Location of DAF plant equipment inside shed. Noise of plant equipment will be consistent with current operations.
Liquid waste spills	Failure of containment infrastructure	Overland flow and seepage to soils and groundwater	Septage and grease trap liquids and solids shall be stored within bunded concrete hardstand as identified on the amended site plan, with 1.4m high walls, 170% of the volume of any of the new settlement tanks 42.5m ³ Spills contained and redirected for processing
Contaminated stormwater runoff	Storage and handling of wastes onsite	Overland flow and seepage to soils and groundwater	Existing drainage system includes a triple interceptor which discharges to a compensation basin. Condition 6 of current licence requires monthly monitoring of the Triple interceptor. Where emission limits are not met, stormwater is pumped out and returned to the plant for processing.
Wastewater discharges	Processed waste water (from DAF plant)	Overland flow and seepage to soils and groundwater	All wastewater generated from the sites is processed, tested and treated before discharging into the Water Corporation's sewer system. A parallel batch treatment system is used which allows for continuous disposal to sewer.
Toxic smoke and particulates	Accidental fire on premises	Airborne pathway/wind	All wastes stored onsite must be stored and processed in a manner that prevents incompatible wastes mixing Separation distance to sensitive residential receptors
Firefighting washwaters	Firefighting activities in response to accidental fire on premises	Overland flow and seepage to soils and groundwater	Packaged wastes are stored outside on bunded concrete hardstand. Bunded concrete hardstand constructed with blind sump to facilitate collection of accumulated runoff

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)). Figure 1 illustrates the relative distance from the premises to these receptors.

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

Receptor ID	Human receptors	Distance from prescribed activity
H1	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
H2	Radium Street Lunch Bar, 2/126-128 Radium Street, Welshpool	Approximately 140m southeast of eastern premises boundary
H3	Bentley Residential Area (Merian Close, Bentley)	Approximately 420 m south-west of the southern premises boundary
H4	Queens Park Residential Area (Mills Street, Queens Park)	Approximately 500m southeast of the southern premises boundary - down hydraulic gradient
Receptor ID	Environmental receptors	Distance from prescribed activity
E1	Water Corp Storm Water Catchment, to the rear of 133 Welshpool Rd, Welshpool	Immediately abutting northern premises boundary
E2	Water Corporation compensating basin between Radium Street and Mills Road, Queens Park	Approximately 300m east of premises boundary- down hydraulic gradient
E3	Threatened Ecological Community - Priority 3 Endangered Banksia Woodlands of the Swan Coastal Plain ecological community	Immediately abutting northern premises boundary
N/A	RIWI Act - Perth Groundwater Area	The premises lies within the proclaimed Perth Groundwater Area



Figure 1: Distance to human and environmental receptors from premises boundary (pink).

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 0. 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 0), 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 i.e. receipt, handling, Treatment, storage, and storage of liquid and solid wastes.

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 operations

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								
Receipt, storage and transfer of 45,000 tpa of additional liquid waste	Liquid waste spills	Overland flow, stormwater network and infiltration to soil resulting in potential impacts to groundwater users and impacts on the biological diversity and ecosystem function of wetlands	Compensation basins and groundwater users	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Conditions 1 and 7	N/A
	Contaminated stormwater	Overland flow, stormwater network and infiltration to soil resulting in potential impacts to groundwater users and impacts on the biological diversity and ecosystem function of wetlands	Compensation basins and groundwater users	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Conditions 1 and 7	N/A

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				
	Firefighting washwaters and contaminated runoff	Overland flow, Stormwater network and infiltration to soil resulting in potential impacts to groundwater users and impacts on the biological diversity and ecosystem function of wetlands	Compensation basins and groundwater users	Refer to Section 3.1	C = Moderate L = Rare Medium Risk	Y	Condition 1 and 7	N/A
	Uncontrolled Fire (smoke)	Air /airborne/wind dispersion resulting in human health impacts (smoke inhalation, noxious particulates)	Adjacent industrial and commercial premises	Refer to Section 3.1	C = Moderate L = Rare Medium Risk	Y	Condition 1 and 5	N/A
	Noise	Airborne pathway/wind from additional vehicle movements	Residents to the south east (140m) and south west (500m)	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1	N/A
	Dust				C = Minor L = Rare Low Risk	Y	N/A	N/A

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				
	Odour	Airborne pathway/wind from additional liquid waste handling and storage	Residents to the south east (140m) and south west (500m)	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1	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 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
City of Canning provided with application referral on (22/09/2023)	None received	N/A
Licence Holder was provided with draft amendment on (12/10/2023)	The Licence Holder responded 13 October 2023 waiving the draft comment period and requesting final version forthwith	Final version issued 17 October 2023

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.

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 or section	Proposed amendments
Prescribed premises category description	Assessed production/design capacity from 55,000 to 100,000 tonnes per annual period
Schedule 1: Maps	Addition of premises layout (Figure 2) Addition of tank bund layout (Figure 3) Addition of amended tank bund (Figure 4)
Appendix A: Waste acceptance, processing, and storage	Combined quantity limits for all liquid wastes amended from 55,000 to 100,000 tonnes per annual period within column 3 of Table 1 Storage and bunding for liquid waste within column 7 of Table 1 amended to require storage in impervious containers or tanks within a bunded hardstand area; and maintained to be impervious and contain at least 120% of the volume of the largest vessel within the bund. Previously Table 1 had no volume requirement on the bunded area. The Licence Holder has demonstrated the amended bund will hold at least 175% of the volume of the largest vessel within the bund.

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.
4. Department of Agriculture, Water, and the Environment (2020) *PFAS National Environmental Management Plan Version 2.0', Heads of EPA Australia and New Zealand 2020'*.

Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY				
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:	L7639/2000/8	
		Relevant works approval number:		N/A <input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None <input type="checkbox"/>
Date application received		20 July 2023		
Applicant and Premises details				
Applicant name/s (full legal name/s)		Western Resource Recovery Pty Ltd		
Premises name		Western Resource Recovery		
Premises location		Lot 278 on Plan 3033		
Local Government Authority		City of Canning		
Application documents				
HPCM file reference number:		2012/003338-1		
Key application documents (additional to application form):		<ul style="list-style-type: none"> - Western Resource Recovery Welshpool - Licence Amendment Supporting Documentation - Water Corporation Trade Waste Permit 		
Scope of application/assessment				

Summary of proposed activities or changes to existing operations.	Proposed increase in throughput from the current production processing limit of 55,000 annual tonnes to 100,000 annual tonnes.	
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 61: Liquid Waste Facility	55,000 Tonnes per annual period	Increase to 100,000 Tonnes per annual period
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 checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input checked="" 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"/>	N/A
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>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004 (Listed Facility)</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"/>	-