



Application for Licence Amendment

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

Licence Number	L8171/2007/2
Licence Holder	Pure Environmental WA Pty Ltd
ACN	609 291 858
File Number	APP-0026257
Premises	R.M.D Industrial Services 24 Hurrell Way Rockingham WA 6168 Legal description - Being Lot 1344 on Plan 211313 As defined by the premises maps in Schedule 1 of the revised licence
Date of Report	11 February 2025
Decision	Revised licence granted

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

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1. Decision summary

Licence L8171/2007/2 is held by Pure Environmental WA Pty Ltd (licence holder) for the R.M.D Industrial Services premises (the premises), located at 24 Hurrell Way, Rockingham.

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 L8171/2007/2 has been granted.

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 and background

On 24 September 2024, the licence holder submitted an application to the department to amend licence L8171/2007/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The amendment being sought is to increase the throughput of liquid waste permitted to be accepted at the premises. The current throughput is based on the premises' Water Corporation trade waste discharge permit. The permit allowance has been increased and the licence holder wishes to align licence L8171/2007/2 to the trade waste discharge permit.

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

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity
61	23,000 tonnes per annual period	87,360 tonnes per annual period
61A	5,000 tonnes per annual period	No change proposed.

On 29 May 2024, an amendment was granted to licence L8171/2007/2 which included the addition of Category 61A (solid waste facility) and the construction and installation of new bunding infrastructure for the acceptance, processing and storage of solid waste on the premises. The proposed infrastructure included channel drains surrounding the Waste Receipt Area which drained to sealed concrete sumps.

After granting, the application was appealed by the licence holder. In reviewing the licence as part of the appeal process, the department recommended updating condition 4 to replace the terminology waste streams to waste type, and update the definition of suitably qualified chemist to include chemical engineers. The appeal was subsequently withdrawn before the appeal process was finalised. As part of this amendment, the department is updating condition 4 and the definition of suitably qualified chemist to align with the recommendations outlined in the department's draft appeal report.

On 30 September 2024, the licence holder submitted an Environmental Compliance Report (ECR) for the construction and installation of the drainage infrastructure for the acceptance, processing and storage of solid waste in accordance with the specified works conditions in the

licence. The licence holder reported in the ECR that drive-over bunds were constructed instead of channel drains. The department undertook a site visit on 23 December 2024 to conduct a visual assessment of the new infrastructure and undertook an ECR review on 21 January 2025. While the licence holder was found to be non-compliant with the specified works conditions, the delegated officer determined that the roll-over bund was a more effective control for liquid waste compared to the channel drains and that the risk assessment was not altered by the deviation in works. As part of this amendment, the delegated officer is removing conditions relating to the specified works and updating the infrastructure table to remove reference to channel drains and include roll-over bunding.

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
Dust	Acceptance, storage, processing and treatment of liquid wastes	Air/windborne pathway	No additional proposed controls.
Noise			No additional proposed controls.
Odour			No additional proposed controls.
Industrial wastes / contaminated stormwater	Acceptance, storage, processing and treatment of liquid wastes Loss of containment through: <ul style="list-style-type: none"> • Spillages of liquid waste; • Contaminated stormwater runoff; • Overflow of bunded areas; and/or • Containment equipment failure (tank, bunding, handstand) 	Seepage into underlying soils Overland flow to stormwater network Infiltration to groundwater	No additional proposed controls.
Fire / smoke	Inappropriate storage, treatment and consolidation (mixing) of waste	Air/windborne pathway	No additional proposed controls.
Firewater		Seepage into underlying soils Overland flow to stormwater network Infiltration to groundwater	No additional proposed controls.
Discharge of waste to Trade Waste network with unknown	Acceptance, storage, treatment and consolidation (mixing) of waste	Direct discharge into Cockburn Sound via Point Peron	No additional proposed controls.

Emission	Sources	Potential pathways	Proposed controls
composition and contamination levels		WWTP ocean outflow impacting water quality	

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 receptors	Approximately 600 m south-east of the prescribed premises
Industrial receptors	Located to the immediate east and west of the prescribed premises
South Metropolitan TAFE Rockingham	Approximately 300 m south of the prescribed premises
Rockingham library	Approximately 330 m south-west of the prescribed premises
Kolbe Catholic College	Approximately 520 m south-west of the prescribed premises
Environmental receptors	Distance from prescribed activity
Underlying groundwater	Groundwater approximately 4 m bgl
Rights in Water and Irrigation Act 1914 (RIWI Act) Proclaimed Groundwater - Rockingham Groundwater Area	The premises is within the Rockingham Groundwater Area
Cockburn Sound	Located approximately 1900 m west of the premises

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 4.

The revised licence L8171/2007/2 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	Existing licence conditions sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder's controls				
Operation								
Acceptance, storage, processing and treatment of liquid wastes	Dust	Air/windborne pathway causing impacts to health and amenity	Residence 600 m south-east	No additional proposed controls	C = Minor L = Unlikely Medium Risk	Y	N/A	Emission to be regulated under the general provisions of the EP Act
	Noise		Industrial premises located adjacent to the premises		C = Minor L = Possible Medium Risk	Y	N/A	Emission to be regulated under the <i>Environmental Protection (Noise) Regulations 1997</i> (EP Noise Regulations)
	Odour		Community facilities 600 m south and 330 m south-east of premises		C = Minor L = Likely Medium Risk	Y	N/A	Emission to be regulated under the general provisions of the EP Act
Acceptance, storage, processing and treatment of liquid wastes Loss of containment through: <ul style="list-style-type: none"> Spillages of liquid waste; Contaminated stormwater runoff; Overflow of bunded areas; and/or Containment 	Industrial wastes / contaminated stormwater	Seepage into underlying soils causing localised contamination Overland flow to stormwater infrastructure and infiltration to groundwater causing ecosystem disturbance or impacting groundwater	Groundwater 4 m bgl Cockburn Sound 1.9 km west of the premises		C = Major L = Unlikely Medium Risk	Y	Condition 1 Conditions 1, 3, 5, 6 & 10	The delegated officer has included the requirement to have two drain seals on site to seal the soak wells on site in the event of a spill or fire. The delegated officer considers drain seals as a necessary control to prevent discharge of industrial wastes or contaminated stormwater to the environment.

Risk Event					Risk rating ¹	Existing licence conditions 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			
equipment failure (tank, bunding, handstand)		quality						
Inappropriate storage, treatment and consolidation (mixing) of waste	Fire / smoke	Air/windborne pathway causing impacts to health and amenity	Residence 600 m south-east Industrial premises located adjacent to the premises Community facilities 600 m south and 330 m south-east of premises		C = Major L = Rare Medium Risk	Y	Conditions 1, 2, 3, 4, 5, 6, 7 & 8	N/A
	Firewater	Seepage into underlying soils causing localised contamination Overland flow to stormwater infrastructure and infiltration to groundwater causing ecosystem disturbance or impacting groundwater quality	Groundwater 4 mbgl		C = Major L = Rare Medium Risk	N	<u>Condition 1</u>	The delegated officer has included the requirement to have two drain seals on site to seal the soak wells on site in the event of a spill or fire. The delegated officer considers drain seals as a necessary control to prevent discharge of firewater to the environment.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Existing licence conditions sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder's controls				
Acceptance, storage, treatment and consolidation (mixing) of waste	Discharge of waste to Trade Waste network with unknown composition and contamination levels	Direct discharge into Cockburn Sound via Point Peron WWTP ocean outflow impacting water quality	Cockburn Sound		C = Major L = Rare Medium Risk	Y	Conditions 1, 3, 4, 6, 8 & 9	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
Licence holder was provided with draft amendment on 30 January 2025	An email response was received from the licence holder on 4 February 2025 requesting to waive the consultation period	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
Front cover	Update DWER file number to be consistent with new numbering system
Front cover	Increase annual throughput of Category 61 to 87,360 tonnes per annual period
1	Inclusion of requirements for Waste Receipt Area to be maintained free of cracks and defects and must drain to a sealed concrete sump
1	Removal of channel drains from infrastructure table
1	Inclusion of Inspection and IBC Bunded Area in infrastructure table
1	Inclusion of drain seals in infrastructure table
3	Increase annual throughput of liquid waste to 87,370 tonnes per annual period
4	Update wording to remove reference of waste streams and replace with waste types
19, 20 & 21	Removal of completed specified works conditions
Definitions	Update definition of suitably qualified chemist

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.