



<b>Licence Number</b>	L8461/2010/2
<b>Licence Holder</b>	Cleanaway Daniels Services Pty Ltd
<b>ACN</b>	093 315 014
<b>File Number:</b>	2010/004171-2
<b>Premises</b>	Daniels Health Services Pty Ltd 19 Coolibah Way BIBRA LAKE WA 6163 Lot 164 on Deposited Plan 17339
<b>Date of Report</b>	05/05/2020
<b>Decision</b>	Amendment Granted

# 1. Definitions and interpretation

## Definitions

In this Amendment Report, the terms in Table 1 have the meanings defined.

**Table 1: Definitions**

Term	Definition
ACN	Australian Company Number
Amendment Report	refers to this document
AS 4187	Australian Standard AS 4187:2014 <i>Cleaning, disinfecting and sterilizing reusable medical and surgical instruments and equipment, and maintenance of associated environments in health care facilities</i> which shall be read as with the following changes: <ul style="list-style-type: none"><li>(a) “sterilizer” is changed to “decontaminator”;</li><li>(b) “sterilization” is changed to “decontamination”;</li><li>(c) “sterilize” is changed to “decontaminate”;</li><li>(d) “sterilizing” is changed to “decontaminating”; and</li><li>(e) “minimum sterility assurance level (SAL) of 10<sup>-6</sup> is changed to “minimum sterility assurance level (SAL) of 10<sup>-4</sup>”.</li></ul>
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer. CEO for the purposes of notification means:  Director General Department administering the <i>Environmental Protection Act 1986</i> Locked Bag 10 Joondalup DC WA 6919  or: <a href="mailto:info@dwer.wa.gov.au">info@dwer.wa.gov.au</a>
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation

<b>Term</b>	<b>Definition</b>
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Review
Licence Holder	Cleanaway Daniels Services Pty Ltd
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Occupier	has the same meaning given to that term under the EP Act.
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Amendment Report applies, as specified at the front of this Amendment Report.
Revised Licence	the amended Licence issued under Part V, Division 3 of the EP Act, with changes that correspond to the assessment outlined in this Amendment Report.
Risk Event	as described in <i>Guidance Statement: Risk Assessment</i>
tpa	Tonnes per annual period
UDR	<i>Environmental Protection (Unauthorised Discharges) Regulations 2004 (WA)</i>

## 2. Amendment Description

This amendment has been informed by DWER's Regulatory Framework which is available at <https://www.der.wa.gov.au/our-work/regulatory-framework>.

### 2.1. Purpose and scope of assessment

This amendment is a result of the amendment application received 17 December 2019 to include additional waste types to the waste acceptance table as follows:

- Putrescible waste (paper) – Approximately 60 tonnes per annual period (tpa) of paper in the form of documents for secure shredding. The documents will be collected in locked bins and stored temporarily at the site before being removed to a third party for shredding and disposal/recycling.
- General waste – Approximately 40 tpa in the form of out of date stock from various clients (e.g. baby powder or effervescent multi-vitamin tablets). These will be disposed of according to client instructions but would generally be either through incineration, autoclaving or shredding prior to disposal to landfill.
- X-ray and photographic film – Approximately 5 tpa to be stored temporarily in labelled bins at the site before being sent to a third-party for processing/recycling of silver. X-ray film will be stored in the Yard Area in marked 240L bins with locked lids.
- Waste batteries (0.25 tpa), fluorescent tubes (less than 100 tubes per year) & dental amalgam (0.3 tpa)– Small quantities will be collected in appropriate containers and temporarily stored onsite before being removed to third-parties for recycling/disposal.

The following minor amendments were also requested as part of the application:

- Table 1.2.2 references storage container 'S1' however S1 is no longer shown in the map of storage locations (cold storage refrigerated unit).
- Amendment to Table 1.2.2 to clearly identify that the S1 refrigerated unit is only required to be used to store anatomical and GMO waste. Other clinical and pharmaceutical wastes are not required to be refrigerated.
- Table 1.2.2 also requires clinical waste for autoclave to be stored within the secure enclosed building, within a bunded or contained concrete hardstand. This waste is currently stored in a sea container which is "secure and enclosed". Whilst the container is not bunded or situated on concrete, only small volumes of liquid waste are contained within it stored in purpose-built containers and binds
- Correction of Condition 1.2.8 which references Condition 3.2.2. Condition 3.2.2 does not exist in the current version of the Licence.
- Condition 2.2.1 references a stack height of 10m. As compliance with this was achieved during construction and is not something that would change during the day-to-day operation of the site, the Licence Holder is seeking removal of this reference from the condition.
- Table 3.3.1 – requested removal of the specific reference to incineration occurring in Victoria.

The Application also noted that the Licence Holder has undertaken refurbishment of the blow-down vessel pipework which included installation of strainers designed to reduce odour from stack emissions, and installation of a valve to enable pipes to be cleaned out. The strainers are a stainless steel mesh type with a grid size of 3mm. These enable more frequent cleaning of the pipework to remove excess build-up that could potentially lead to odours at the site.

The Licence Holder noted that there would be no change to the total throughputs for the site.

However, the Licence Holder requested clarification as part of the amendment to more clearly differentiate the waste types and activities for category 61A and category 62 to assist in reporting of throughput.

Table 2 below outlines the proposed changes to the Licence

**Table 2: Proposed throughput capacity changes**

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
61A	5,000 tpa	No change	Acceptance of additional waste types
62	1,000 tpa	No change	Acceptance of additional waste types

## 2.2. Consolidation of Licence

As part of this amendment package DWER has consolidated the licence by incorporating changes made under the following Amendment Notices:

- Amendment Notice 1, granted 2 November 2016 – Increasing the throughput of prescribed premises category 62 from 500 tonnes to 1,000 tonnes per annual period allowing for the acceptance of 500 tonnes/year of Genetically Modified Organisms (GMO); and
- Amendment Notice 2, granted 8 February 2017 – Amending Table 1.2.2 to clarifying autoclaving activities, specifically the autoclaving of non-anatomical waste.

The obligations of the Licence Holder have not changed in consolidating the licence. DWER has not undertaken any additional risk assessment of the Premises related to previous Amendment Notices.

In consolidating the licence, the CEO has:

- updated the format and appearance of the Licence;
- deleted the redundant AACR form set out in Schedule 2 of the previous licence and advise the Licence Holder to obtain the form from the Department's website; and
- corrected clerical mistakes and unintentional errors.

Previously issued Amendment Notices will remain on the DWER website for future reference and will act as a record of DWER's decision making.

### 3. Other approvals

The Licence Holder has provided the following information relating to other approvals as outlined in Table 3.

**Table 3: Relevant approvals**

Legislation	Number	Approval
<i>Planning and Development Act 2005</i>	DA13/0621	<p>The City of Cockburn issued retrospective change of use approval for a 'General (Licensed) industry (clinical waste transfer station)' on 8 August 2013.</p> <p>Key requirements in the approval include:</p> <ul style="list-style-type: none"> <li>• All stormwater must be contained and disposed of on-site to the satisfaction of the City;</li> <li>• All waste and recycling materials must be contained within bins. These must be stored within the buildings or within an external enclosure located and constructed to the satisfaction of the City's Manager Environmental Health Services. The external closure must be and of an adequate size to contain all waste bins, at least 1.8m high, fitted with a gate and graded to a 100mm diameter industrial floor waste with a hose cock, all connected to sewer. The minimum provisions for internal bin storage is a concrete wash-down pad of at least 1m<sup>2</sup> graded to a 100mm diameter industrial floor waste with a hose cock, all connected to sewer. This can be centrally located within the development;</li> <li>• No activities causing noise and/or inconvenience to neighbours;</li> <li>• If an odour detected at a nearby premises is deemed to be offensive by an Environmental Health Officer, then any process, equipment and/or activities that are causing the odour shall be stopped until the process, equipment and or activity has been altered to prevent odours to the satisfaction of the City's Manager of Health Services;</li> <li>• The wash down of plant, vehicles or equipment must be carried out over a wash down pad with waste water treated to remove solids and hydrocarbons prior to discharge to the environment; and</li> <li>• The bin wash area must be provided with a hose cock and located on a concrete wash-down pad graded to a 100mm diameter industrial floor waste and connected to sewer.</li> </ul>

## 4. Licensing history

Table 4 provides the amendment history for L8461/2010/2.

**Table 4: Licence amendments**

Instrument	Issued	Amendment
17/09/2010	L8461/2010/1	Licence granted.
27/05/2011	L8461/2010/1	Licence amendment following appeal of conditions
13/11/2014	L8461/2010/1	Licence amendment to REFIRE, and to include new waste streams for storage prior to incineration offsite and shredding machine
10/09/2015	L8461/2010/2	Licence reissue
30/03/2016	L8461/2010/2	Licence amendment to updated occupier details (name change from SteriHealth to Daniels Health) and minor DWER initiated amendments.
02/11/2016	L8461/2010/2	Amendment Notice 1 – Inclusion of GMO waste acceptance and increase in Premises capacity
08/02/2017	L8461/2010/2	Amendment Notice 2 – Clarification to autoclaving activities
05/05/2020	L8461/2010/2	Licence amendment to include additional waste streams and administrative amendments

## 5. Environmental siting

Table 5 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

**Table 5: Receptors and distance from activity boundary**

Residential and sensitive premises	Distance from Prescribed Premises
Residential premises	Residential areas extend from the east to south of the Premises. The closest residence is 450m south-east.  Other residential areas such as South Lake and Spearwood are within 2km of the Premises and are located to the east, south and west of the Premises.
Industrial premises	Directly adjacent and surrounding the Premises

Table 6 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

**Table 6: Environmental receptors and distance from activity boundary**

Environmental receptors	Distance from Prescribed Premises
South Lake	830m north-east of Premises boundary (resource enhancement)
Yangebup Lake	1.25km south-east (conservation category)
Little Rush lake	1km east (conservation category sumpland)
Bibra Lake	1.6km north-east of Premises (resource enhancement)
Bush Forever: Regional open space or proposed regional open space	660m north-east of Premises; and 800m east of Premises (which extends to the south)
Beeliar Regional park/s	660m north-east of Premises; 940m east of Premises; and 1050m east (which extends south)
Groundwater contours	Historical maximum groundwater contours between 9-10mAHD in the vicinity of the Premises
Public Drinking Water Source Areas	The premises is not located within a Public Drinking Water Source Area
Acid sulfate soils	The Premises is not located within an area identified as having a risk of Acid Sulfate Soils

## 6. Risk assessment

Table 7 below describes the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. Both tables identify whether the emissions present a material risk to public health or the environment, requiring regulatory controls.



**Table 7: Risk assessment for proposed amendments during operation**

Risk Event				Consequence rating <sup>1</sup>	Likelihood rating <sup>1</sup>	Risk <sup>1</sup>	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Licence Holder controls					
Waste storage	Noise	Noise from normal operations onsite including the handling of materials as well as noise emitted from vehicle movements causing adverse amenity impacts on people outside the Premises.	Operations predominantly occur within an enclosed warehouse	Minor	Unlikely	Medium	The proposed changes will not result in an increase in noise from the Premises. Noise from normal operations are still expected to meet the assigned levels of the <i>Environmental Protection (Noise) Regulations 1997</i> (EP Noise Regulations).	N/A – The EP Noise Regulations apply
	Odour	Odour emissions generated from the storage of potentially odorous wastes onsite impacting the health and amenity of nearby sensitive receptors.	Additional wastes proposed to be accepted will be stored in purpose-built containers/bins in designated storage areas.	Moderate	Unlikely	Medium	The additional waste types proposed to be accepted are not expected to result in an overall increase in odour emissions from the Premises.  The Licensee has requested clarification in the Licence that only GMO and anatomical waste requires refrigeration. The Delegated Officer considers these waste types have the greatest potential for odour generation at the Premises and has amended Table 1.2.1 to reflect this.	Conditions 1.2.1 to 1.2.4 – Waste acceptance limitations, storage and processing requirements
	Spills and leaks	Spills or leaks from wastes accepted, stored and processed at the Premises may seep through soil into surrounding land and groundwater resulting in contamination	Additional wastes proposed to be accepted will be stored in purpose-built containers/bins in designated storage areas.	Minor	Unlikely	Medium	Taking into consideration the types, quantities and methods of storing additional waste types, it is unlikely that the proposed changes will result in an overall increase in the risk of spills or leaks at the Premises.	Conditions 1.2.1 – 1.2.4 and 1.2.9 – 1.2.10 – Waste acceptance limitations, processing and storage requirements
	Contaminated stormwater	Stormwater coming into contact with wastes stored at the Premises may seep through soil to groundwater resulting in potential contamination of surrounding land and groundwater. Contaminants may include pathogens and viruses which may cause health issues for members of the public.	Additional wastes proposed to be accepted will be stored in purpose-built containers/bins in designated storage areas.	Minor	Unlikely	Medium	Taking into consideration the types, quantities and methods of storing additional waste types, it is unlikely that the proposed changes will result in an overall increase in the risk of contaminated stormwater at the Premises.	Conditions 1.2.1 – 1.2.4 and 1.2.9 – 1.2.10 – Waste acceptance limitations, processing and storage requirements
Shredding of waste	Noise	Noise emissions from the operation of the shredder plant causing adverse amenity impacts on people outside the Premises	Purpose built shredding comprising of a two-shaft high torque slow speed shredding system to reduce noise emissions. The shredding machine is located within an enclosed warehouse and operates in 15-minute cycles within business hours.	Minor	Unlikely	Medium	The proposed changes will not result in an increase in the noise emissions expected from the shredder. The assigned levels of the EP Noise Regulations are still expected to be met.	N/A - The EP Noise Regulations apply
	Dust	Dust from the shredding of autoclaved wastes being released into the air causing health and amenity impacts on people outside of the Premises.	Purpose built shredder located within an enclosed warehouse.	Minor	Rare	Low	Dust emissions from the shredder are expected to be minimal given that the operations are occurring within an enclosed warehouse.	N/A – Regulatory controls not required
Autoclaving of waste	Noise	Noise emissions from the operation of the autoclave causing adverse amenity impacts	The autoclave is located within an enclosed warehouse.	Minor	Unlikely	Medium	There is no history of complaints in regards to noise for the Premises. The noise emissions from the autoclave are expected to meet the EP Noise Regulations.	N/A – The EP Noise Regulations apply

Risk Event				Consequence rating <sup>1</sup>	Likelihood rating <sup>1</sup>	Risk <sup>1</sup>	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Licence Holder controls					
	Odour	<p>Odour emissions generated from the operation of the autoclave plant may travel through air causing impacts to people outside of the Premises.</p> <p>Elevated odour in the steam generated from the autoclave may occur where the autoclave equipment is not operating efficiently (e.g. where there is an accumulation of fat in the blow-down vessel from insufficient maintenance).</p>	<p>The Licence Holder has undertaken refurbishment of the blow-down vessel pipework which included installation of strainers designed to reduce odour from stack emissions, and installation of a valve to enable pipes to be cleaned out. The strainers are a stainless steel mesh type with a grid size of 3mm. These enable more frequent cleaning of the pipework to remove excess build-up that could potentially lead to odours at the site.</p>	Moderate	Possible	Medium	<p>The Delegated Officer notes that complaints have been received in relation to odour from the blow-out stack.</p> <p>The Licence Holder has since undertaken refurbishment of the blow-down vessel pipework and installed strainers to assist in cleaning and maintenance of the blow-out stack.</p> <p>The Delegated Officer considers that regular cleaning and maintenance of the blow-down stack is important to minimise the potential for odour emissions from the autoclave process.</p>	Condition 2.2.3 maintenance of pollution infrastructure
	Air emissions (bacteria/pathogens)	<p>Emissions from the blow down vessel stack and the door vent relief stack should only consist of steam during normal operations.</p> <p>Bacteria or pathogens may be released from the autoclave through doors or the blow down vessel and stack due to malfunction of equipment or early release of steam, moving through air causing health impacts to people outside of the Premises.</p>	<p>Autoclaving is the process of steam sterilisation. Steam sterilisation kills microbial flora and fauna through the moisture and heat of the saturated steam. The steam sterilizing process is controlled by time and temperature with the parameters set to ensure steam penetration into the most difficult part of the load.</p>	Moderate	Rare	Medium	<p>The Delegated Officer considers that the autoclaving process for treating clinical and related waste shall ensure an acceptable level of microbial inactivation. The proposed changes will not alter the quality of the air emissions in regards to bacteria and pathogens.</p>	<p>Conditions 1.2.5 – 1.2.8 – Autoclave treatment process requirements</p> <p>Conditions 1.2.9 – 1.2.10 – Management of untreated and treated waste.</p> <p>Conditions 2.2.1 – 2.2.2 – Point source emissions to air</p> <p>Conditions 3.1.1 – 3.1.4 – Monitoring of point source emissions to air</p>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Department's Guidance Statement: Risk Assessments (February 2017)

## 7. Consultation

**Table 9: Summary of consultation**

Method	Comments received	DWER response
City of Cockburn advised of proposal (9 March 2020)	<p>Comments were received from the City of Cockburn on 6 April 2020.</p> <p>The City noted:</p> <ul style="list-style-type: none"> <li>• Planning approval for the site was issued in 2013 under DA13/0621 as a Change of use to Warehouse, Office, General (Licensed) Industry (Clinical Waste Transfer Station) and new signage, with conditions.</li> <li>• There have been 2 to 3 odour complaints from this site over the past few years in relation to the odour (dead smell) from the autoclave stacks. As such, more stringent odour controls/mitigating strategies may be necessary.</li> </ul>	Noted, an additional condition relating to regular maintenance of the blow down vessel and stacks have been included in response to previous odour complaints from the Premises.
Licence Holder referred draft documents (22 April 2020)	<p>Comments were received from the Licence Holder on 5 May 2020.</p> <p>The Licence Holder noted:</p> <ul style="list-style-type: none"> <li>• There is no increase in throughputs</li> <li>• The batteries accepted are nickel cadmium batteries</li> <li>• Out of stock general waste does not get processed or treated on-site.</li> <li>• Only cytotoxic, clinical and pharmaceutical wastes are autoclaved</li> <li>• The service provider used for sample complies with AS 4187 methodology</li> <li>• The storage location “Yard Area” is not shown on the map, and the “Incineration Waste Storage” is not indicated with a red line.</li> </ul>	All comments noted. Reference to the Incineration Waste Storage area being defined by a red line is removed, and references to the Yard Area are replaced with storage outside of the warehouse.

## 8. Decision

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a licence amendment will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### 8.1. Summary of amendments

Table 8 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 8: Licence amendments**

Condition No.	Proposed amendments
Definitions	<p>The definition for AS 4187 was revised to reflect current Australian New Zealand Standard AS 4187:2014</p> <p>The definition for 'CEO' was revised to reflect current contact details.</p> <p><b>Grounds:</b> Administrative amendments to reflect updates to the Australian Standard and correct contact details for the CEO.</p>
1.2.1 (Table 1.2.1)	<p>Amendments to include additional waste types. The table has also been revised to distinguish between category 61A and category 62 activities.</p> <p><b>Grounds:</b> Additional waste types requested as part of the amendment application. Revisions to distinguish between the category activities was also requested by the Licence Holder.</p>
1.2.3 (Table 1.2.2)	<p>Amendments to include additional waste types. The table has also been revised to distinguish between category 61A and category 62 activities.</p> <p><b>Grounds:</b> As above, additional waste types requested as part of the Amendment application. Revisions to distinguish between the category activities was also requested by the Licence Holder.</p>
1.2.8	<p>Condition revised to reference Condition 3.1.2.</p> <p><b>Grounds:</b> Administrative amendment to correct condition reference.</p>
2.2.1 (Table 2.2.1)	<p>Column 3 of Table 2.2.1 relating to emission point height has been removed.</p> <p><b>Grounds:</b> Administrative amendment requested as part of the amendment application. Removal of this condition does not authorise changes to the stack height. The Licence Holder would require approval from DWER in accordance with the requirements of the EP Act prior to altering the height of the stack</p>
2.2.3	<p>Condition 2.2.3 has been included as part of this amendment to ensure the blow down vessel, strainers and stack are regularly maintained to prevent accumulation of fats or other residues.</p> <p><b>Grounds:</b> The Delegated Officer considers the accumulation of fats or other residues in the stack and associated infrastructure has the potential to result in increased odour emissions. Regular maintenance and cleaning of this infrastructure will reduce the potential for increased odour emissions.</p>
3.2.1 (Table 3.3.1)	<p>Table 3.3.1 Waste Inputs parameter has been amended to reflect all Wastes as detailed in the waste acceptance table (Table 1.2.1)</p> <p><b>Grounds:</b> Administrative amendment to reflect changes to waste acceptance types.</p>
Schedule 1: Maps	<p>Map of storage locations updated</p> <p><b>Grounds:</b> Administrative amendment to reflect storage areas at the Premises.</p>

Melissa Chamberlain  
A/MANAGER WASTE INDUSTRIES  
REGULATORY SERVICES

*An officer delegated by the CEO under section 20 of the EP Act*



## Appendix 1: Key documents

	Document title	Availability
1	Application to amend Licence received 17 December 2019	DWER records (A1852642)
2	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
3	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	
4	DER, February 2017. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	
5	DER, June 2019. <i>Guidance Statement: Decision Making</i> . Department of Environment Regulation, Perth.	