



Licence Number	L8585/2011/1
Licence Holder	Peel Resource Recovery Pty Ltd
ACN	149 428 697
File Number:	2011/006756-1~1
Premises	Pinjarra Transfer Recycling Facility 49 Munday Avenue PINJARRA WA 6208 Lot 100 on Deposited Plan 408156
Date of Report	18 March 2020
Decision / Proposed Decision	Intent to grant Licence

1. Definitions and interpretation

Definitions

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

Table 1: Definitions

Term	Definition
AACR	Annual Audit Compliance Report
ACN	Australian Company Number
AER	Annual Environment Report
Amendment Report	refers to this document
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 info@dwer.wa.gov.au
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
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	Peel Resource Recovery Pty Ltd
Minister	the Minister responsible for the EP Act and associated

Term	Definition
	regulations
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>

2. Amendment Description

The following guidance statements have informed the assessment and decision outlined in this Amendment Report:

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Licence Duration (August 2016)*
- *Guidance Statement: Decision Making (June 2019)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

2.1. Purpose and scope of assessment

Pinjarra Transfer Recycling Facility is a waste transfer recycling station located in the town of Pinjarra, approximately 86 kilometres south of Perth. It is located in the Pinjarra Industrial Estate and surrounded by rural dwellings and activities. Pinjarra Transfer Recycling Facility accepts waste building materials and green waste from the greater Bunbury region for sorting and recycling.

On 9 December 2019 Environmental Compliance Officers of the Department of Water and Environmental Regulation (DWER) undertook a compliance inspection of the Premises subject of L8585/2011/1. During this inspection it was identified that the Licence Holder was operating outside of the prescribed premises boundary. It was also identified that the screener was situated in an area contrary to the existing licence and that it was not of the type specified on the Licence.

On 9 December 2019 the Licence Holder submitted an application to amend L8585/2011/1, requesting to amend the Premises boundary. The Licence Holder advised that the adjacent land had been purchased and amalgamated into one Lot (Lot 100). The Pinjarra Transfer Station had consequently expanded onto this land and is now using this area to stockpile; gravel, limestone, fill sand, screened brickies sand, recycled crushed concrete, recycled hotmix, clean concrete and clean asphalt/bitumen. The approximate height of stockpiles is two metres and the Licence Holder has advised that stockpiles will not exceed five metres. The Licence Holder has advised that sprinklers are allocated to each stockpile and each stockpile is wetted down regularly to maintain dust. The hardstand is made up of a 300 millimetre compacted layer of crushed concrete roadbase and is approximately 4,500m².

In further correspondence provided to DWER, dated 13 December 2019 the Licence Holder provided details of an alternate screener that is being utilised at the Premises.

As per licence conditions, the Licence Holder originally utilised a McCloskey Screener which was mobile and was placed near the rear door of the transfer station shed. The McCloskey Screener had a diesel motor, which the Licence Holder advised was noisy and produced black smoke. Due to noise and black smoke this screener was removed from the Premises in 2016. As an alternative to the diesel motor screener the Licence Holder switched to an electric screener. The electric screener consists of a hopper, conveyor and a Terex 883 screen box. The hopper and conveyor are located within the transfer station shed and the screen box is located outside of the shed. The screen box is 4.8 metres long and 1.5 metres wide. It has two screens, of which the top deck screens 0-44 millimetres and the bottom deck screens 0-15 millimetres. Material is wet down before it is fed into the hopper and there is another misting system at the screen box.

The Licence Holder has advised that crushing has never occurred at the Premises but wished to retain it on the Licence in case the need arises in the future. If a crusher is used at the

Premises it will take place in the stock pile area, north of the transfer station shed and approximately 20 metres from the Premises boundary.

In amending the Licence, the CEO has also:

- updated the format and appearance of the Licence;
- revised Licence condition numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

3. Other approvals

The following information relates to other approvals as outlined in Table 2.

Table 2: Relevant approvals

Legislation	Number	Approval
Town Planning Scheme No.4 – Planning Approval – Shire of Murray	MU07/239, D15/53126, P297/2015	Planning Approval for Crushing and Screening – 13 January 2016
<i>Rights in Water and Irrigation Act 1914</i>	GWL182567(1)	Licence to Take Water for the purpose of dust suppression for industrial purposes. Valid until 16 October 2026.

4. Amendment history

Table 3 provides the amendment history for L8585/2011/1.

Table 3: Licence amendments

Instrument	Issued	Amendment
L8585/2011/1	12/09/2011	Licence issue
L8585/2011/1	03/10/2013	Licence amendment and format conversion
L8585/2011/1	4/02/2016	Licence amendment to include the mechanical crushing and screening of construction and demolition waste
L8585/2011/1	18/03/2020	Licence amendment to alter the premises boundary and the location and type of screener. The Licence format and appearance was also updated.

5. Emission sources, pathways and receptors

5.1 Emissions

The potential for emissions to impact on sensitive receptors has been assessed in accordance with the Department's *Guidance Statement: Risk Assessments*. The key emissions considered in this report are dust, noise, asbestos and groundwater contamination from activities including crushing and screening and the stockpiling of waste.

The Applicant has proposed measures to assist in controlling these emissions, where necessary. The control measures have been considered when undertaking the risk assessment detailed in Section 6.

5.2 Pathways

As dust, noise and asbestos are considered potential emissions, the prevailing wind direction has been considered. Using information available on the Bureau of Meteorology's website, the prevailing wind direction at the Dwellingup weather station (2.9km from Pinjarra) is predominately in a south easterly direction in the morning (10.8km/h) and south westerly in the afternoon (12.8km/h).

As groundwater contamination is considered to be a potential emission soil type and rainfall have also been considered. The soil type mapped over the premises is Pinjarra P1a Phase which consists of shallow pale sand to sandy loam over clay. The annual rainfall measured at the Dwellingup weather station is 886mm (2019).

5.3 Receptors

Table 4 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 4: Receptors and distance from activity boundary

Residential and sensitive premises	Distance from Prescribed Premises
Residential property	Approximately 230m east of the prescribed premises boundary.
Residential property	Approximately 275m east of the prescribed premises boundary.

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

Table 5: Environmental receptors and distance from activity boundary

Environmental receptors	Distance from Prescribed Premises
Resource Enhancement Wetland - Palusplain	Approximately 450m north of the prescribed premises boundary.
Conservation Category Wetland	Approximately 780m south east of the prescribed premises boundary.
Murray River	Approximately 1.5km east of the prescribed premises boundary.
Department of Biodiversity Conservation and Attractions (DBCA) managed land	Approximately 780m north of the prescribed premises boundary.
Waterways Conservation Area – Peel Inlet Management Area	Approximately 1km east of the prescribed premises boundary.
Peel Harvey Environmental Protection Policy	Prescribed premises located within Policy area
<i>Rights in Water and Irrigation Act 1914</i> – Murray River System – proclaimed Surface Water Area	Approximately 1.1km east of the prescribed premises boundary.
<i>Rights in Water and Irrigation Act 1914</i> – Murray Groundwater Area	Prescribed premises located within the proclaimed groundwater area

Environmental receptors	Distance from Prescribed Premises
Threatened Ecological Community/Priority Ecological Community - Banksia Dominated Woodlands of the Swan Coastal Plain IBRA Region	Approximately 280m east, 670m north east and 800m north of the prescribed premises boundary.
Threatened Ecological Community – Dense shrublands on clay flats	Approximately 800m north of the prescribed premises boundary.
Threatened flora	Within 400m of the prescribed premises
Endangered fauna – Carnaby's cockatoo (<i>Calyptorhynchus latirostris</i>)	Potential habitat located within 800m of the prescribed premises
Groundwater	Depth to groundwater is approximately 2 metres below ground level (mbgl).

6. Risk assessment

Table 6 below describes the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. The table identifies whether the emissions present a material risk to public health or the environment, requiring regulatory controls.

Table 6: Risk assessment for proposed amendments during operation

Risk Event				Consequence rating ¹	Likelihood rating ¹	Risk ¹	Reasoning	Regulatory controls
Source/Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
Terex electrical screen and crusher located outside of the transfer station shed.	Dust	<p>Receptors: The closest residential receptor is located ~230m east of the Premises.</p> <p>Pathway: Air / wind dispersion</p> <p>Impact: Impacts to health and amenity</p>	<p>The crusher and screener are fitted with misting systems. Sprinkler systems are also used to keep waste in a damp state prior to processing.</p> <p>The crusher and screener are not operated at the same time.</p>	Minor	Unlikely	Medium	<p>Screening and crushing activities will not be a regularly occurring activity at the Premises. Dust suppressing misters and sprinklers will be used when crushing and screening equipment is in use.</p> <p>The Delegated Officer considers that the occasional crushing and screening activities may generate localised fugitive dust emissions which can be mitigated through the proposed Applicant controls.</p>	<p>Conditions 14, 19 and 20.</p> <p>Process limits in Condition 14, Table 2 and Condition 19, Table 4, Item 3 have been added to the Revised Licence to address the increase risk of dust from operating the screen and crusher outside of the transfer station shed. .</p>

Risk Event				Consequence rating ¹	Likelihood rating ¹	Risk ¹	Reasoning	Regulatory controls
Source/Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
	Noise	<p>Receptors: The closest residential receptor is located ~230m east of the Premises.</p> <p>Pathway: Air / wind dispersion</p> <p>Impact: Impacts to health and amenity</p>	<p>The crusher and screener are not operated at the same time. The screener will not be used more than one day a week and the crusher one day a month. Operation of this equipment will only occur on weekdays between the hours of 9am and 4pm.</p> <p>In accordance with the Shire of Murray's Planning Approval a three metre earth noise bund has been constructed at the rear of the property.</p>	Minor	Unlikely	Medium	<p>Screening and crushing activities will only occur at the Premises on occasion. Therefore the Delegated Officer has determined that noise emissions will not be continuous and that the applicant proposed controls and regulatory controls will be sufficient to manage the risk of noise.</p> <p>The <i>Environmental Protection (Noise) Regulations 1997</i> also apply.</p>	Condition 19, Table 4 of Revised Licence (Condition 1.2.3, Table 1.2.2 of Existing Licence)

Risk Event				Consequence rating ¹	Likelihood rating ¹	Risk ¹	Reasoning	Regulatory controls
Source/Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
Stockpiles of waste in amended boundary area	Dust	<p>Receptors: The closest residential receptor is located ~230m east of the Premises.</p>	Sprinklers are allocated to each stockpile and each stockpile is wetted down regularly.	Moderate	Possible	Medium	The Delegated Officer has determined that the applicant proposed controls and the addition of further regulatory controls (Conditions 14 and 19) are sufficient to manage dust emissions from stockpiled waste.	<p>Conditions 14, 19 and 20.</p> <p>Process limits in Condition 14, Table 2 and Condition 19, Table 4, Item 3 has been added to the Revised Licence to address the increase risk of dust from the stockpiling of waste.</p>
	Asbestos	<p>Pathway: Air / wind dispersion</p> <p>Impact: Impacts to health.</p>	The Licence Holder has an Asbestos Management Plan for the Premises. All incoming waste is inspected prior to being accepted at the premises.	Severe	Rare	High	The Delegated Officer has determined that the risk of asbestos can be adequately managed through the adherence of the DER Asbestos Guidelines. Additional conditions have been added to the Licence to incorporate aspects of the DER Asbestos Guidelines.	<p>Conditions 1 – 7: waste acceptance</p> <p>Conditions 8 – 13: unloading inspection</p> <p>Conditions 3-13 have been added to the Revised Licence in lieu of referencing the Asbestos Management Plan.</p>

Risk Event				Consequence rating ¹	Likelihood rating ¹	Risk ¹	Reasoning	Regulatory controls
Source/Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
	Contaminated storm water	<p>Receptors Groundwater is approximately two metres below ground level. Peel Harvey Environmental Protection Policy Area is intersected by the Premises.</p> <p>Pathway Storm water runoff.</p> <p>Impact Contamination of waterways and groundwater from leachate</p>	<p>The hardstand is made up of a 300 millimetre compacted layer of crushed concrete roadbase.</p> <p>Only Inert Waste Type 1 is stored on the limestone hardstand.</p>	Minor	Unlikely	Medium	<p>The wastes stockpiled within the amended Premises boundary are inert and therefore do not have the capacity to impact stormwater. Putrescible wastes are stored within the transfer station shed. There is no long term storage of these wastes at the Premises, further reducing the risk of impact to stormwater.</p>	<p>Conditions 1, 2, and 14. These condition have been carried over from the Existing Licence and are adequate to manage the risk of storm water contamination.</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 7: Summary of consultation

Method	Comments received	DWER response
Local Government Authority advised of application on 17/02/2020	Correspondence from the Shire of Murray was received on 24 February 2020 advising that the Shire issued planning approval in 2016 for the expansion of the facility and therefore no further planning approvals are necessary.	N/A
Applicant referred draft documents on 24/02/2020	Email from Licence Holder received on 17 March 2020 advising that they have 'no comment'.	N/A

8. Conclusion

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
Conditions 3 to 13	Inclusion of asbestos controls to replace reference to the Licence Holder's Asbestos Management Plan. To support this condition Attachment 1 (Asbestos Risk Classification Procedure) and Attachment 2 (High Risk Load Procedure) have been added at the end of the Licence.
Condition 19	Inclusion of the requirement for the Licence Holder to ensure that infrastructure and equipment are maintained in good working order. This is a standard condition to manage emissions from the crusher and screen.
Condition 20, Table 4	Item 3, Sprinkler system has been added to Table 4 to address the increase risk of dust related to the stockpiling of waste on the limestone hardstand.

Table 9 outlines the changes made to conditions in order to reformat the Licence into the current format.

Table 9: Licence conversion map for new licence format

Existing licence condition	Condition Summary	Revised licence condition	Conversion notes
Condition 1.2.1	Waste acceptance	Condition 1	Clean Fill has been added to Table 1 to acknowledge that this waste type is now being stockpiled
Condition 1.2.2	Waste acceptance and removal	Condition 2	Number change only
Condition 1.2.3	Waste Processing	Condition 14, Table 2	The first two dot points in Table 1.2.2 of the Existing Licence have been removed as they are conditioned elsewhere on the licence. Infrastructure locations and operation limits have been moved to Table 4 of the Revised Licence. Additions dust control measures have been added to Table 2 of the Revised Licence.
Condition 1.2.4	Security measures	Condition 15	Number change only
Condition 1.2.5	Prevention of pests and vermin	Condition 16	Number change only
Condition 1.2.6	Windblown waste	Condition 17	Number change only
Condition 1.2.7	No burning of waste	Condition 18	Number change only
Condition 1.2.8	Construction requirements	n/a	This condition has been removed. The Shire of Murray is responsible for ensuring compliance with Planning Approval and outstanding infrastructure requirements (Screen and crusher) are conditioned elsewhere in the licence.
Condition 1.2.9	Infrastructure specifications	Condition 19	Replaced with a more modern standard condition
Condition 1.2.10	Departure from specifications	Condition 20, Table 4	Table 4 updated to reflect the equipment on site. Plant operation time restrictions have been added here.
Condition 1.1.11	List of departures	Condition 21	Number change only
Condition 1.1.12	Construction compliance document	Condition 22	Number change only
Condition 1.1.13	Construction compliance document	Condition 23	Number change only
Condition 2.1.1	Monitoring of inputs and outputs	Condition 24	Inclusion of Inert Waste Type 2
Condition 3.1.1	Records	Condition 25	Number change only

Existing licence condition	Condition Summary	Revised licence condition	Conversion notes
Condition 3.1.2	Annual Audit Compliance Report	Condition 26	Number change only
Condition 3.1.3	Complaints Management System	Condition 27	Condition updated to more clearly define what information should be recorded in regards to complaints.
Condition 3.1.4	Records to be kept	Condition 28	Number change only
Condition 3.2.1	Annual Environmental Report	Condition 29	Number changes only
Condition 3.3.1	Notification	Condition 30	
Schedule 1	Premises Maps	Schedule 1	Maps updated to reflect the change in the Premises boundary and siting of infrastructure.
Form N1	Reporting	Form N1	Updated form provided

Tracey Hassell
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	In text ref	Availability
1	Licence L8585/2011/1 – Peel Resource Recovery Pty Ltd	L8585/2011/1	accessed at www.dwer.wa.gov.au
2	Application for an amendment to Licence L8585/2011/1	n/a	DWER records (DWERDT233476)
3	Email of 13 December 2019 providing details of the new screener	n/a	DWER records (A1851698)
4	Email of 6 February 2020 providing a response to DWER's request for further information	n/a	DWER records (A1865297)
5	Email of 6 February 2020 providing additional details pertaining to the crushing and screening process.	n/a	DWER records (A1865356)
6	Email of 6 February 2020 providing details of the new hardstand area.	n/a	DWER Records (A1866401)
7	DER, July 2015. <i>Guidance Statement: Regulatory principles.</i> Department of Environment Regulation, Perth.	DER 2015a	accessed at www.dwer.wa.gov.au
8	DER, October 2015. <i>Guidance Statement: Setting conditions.</i> Department of Environment Regulation, Perth.	DER 2015b	
9	DER, August 2016. <i>Guidance Statement: Licence duration.</i> Department of Environment Regulation, Perth.	DER 2016a	
10	DER, November 2016. <i>Guidance Statement: Risk Assessments.</i> Department of Environment Regulation, Perth.	DER 2016b	
11	DER, June 2019. <i>Guidance Statement: Decision Making.</i> Department of Environment Regulation, Perth.	DWER 2019	