



## Application for Licence Amendment

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

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<b>Licence Number</b>	L8595/2011/1
<b>Licence Holder</b>	IWM (PBH) Pty Ltd
<b>ACN</b>	647 69 818
<b>File Number</b>	2011/007708-1~8
<b>Premises</b>	Perth Bin Hire 11 Duffey Street BAYSWATER WA 6053  Legal description – Lot 88 on Deposited Plan 44109 Certificate of Title Volume 2607 Folio 71
<b>Date of Report</b>	22 June 2022
<b>Decision</b>	Revised licence granted

**SENIOR INDUSTRY REGULATION OFFICER  
REGULATORY SERVICES**

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

## Table of Contents

<b>1. Decision summary</b>	<b>1</b>
<b>2. Scope of assessment</b>	<b>1</b>
2.1 Regulatory framework	1
2.2 Application summary	1
<b>3. Risk assessment</b>	<b>1</b>
3.1 Source-pathways and receptors	2
3.1.1 Emissions and controls	2
3.1.2 Receptors	7
3.2 Risk ratings	9
<b>4. Consultation</b>	<b>16</b>
<b>5. Conclusion</b>	<b>16</b>
5.1 Summary of amendments	16
<b>References</b>	<b>19</b>
<b>Appendix 1: Summary of Licence Holder’s comments on risk assessment and draft conditions</b>	<b>20</b>
<b>Appendix 2: Application validation summary</b>	<b>24</b>
Table 1: Proposed design or throughput capacity changes	1
Table 2: Licence Holder controls	2
Table 3: Sensitive human and environmental receptors and distance from prescribed activity	7
Table 4. Risk assessment of potential emissions and discharges from the Premises during construction and operation	10
Table 5: Consultation	16
Table 6: Summary of Licence amendments	16
Figure 1: Distance to sensitive receptors	8

## 1. Decision summary

Licence L8595/2011/1 is held by IWM (PBH) Pty Ltd (Licence Holder) for the Perth Bin Hire (the Premises), located at 11 Duffy Street, Bayswater, WA.

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 L8595/2011/1 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 Application summary

On 20 December 2021, the Licence Holder submitted an application to the department to amend Licence L8595/2011/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Installation of a S8000 compaction unit, power pack within an enclosed housing shed and a concrete hardstand, at the rear of the waste acceptance shed;
- Installation of the compaction feed hopper within the northern wall of the waste acceptance shed to feed waste through to the compactor;
- An elevated picking line and infeed waste hopper, located above the existing bunkers within the waste acceptance shed and conveyor;
- Inclusion of existing infrastructure on the Licence (namely main waste processing shed, plant maintenance shed, front end loader, excavator, outside operating area, sprinkler / misting system in waste acceptance shed, fuel tank, office building and perimeter fencing);

This amendment is limited only to changes to Category 62 activities from the existing Licence.

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

**Table 1: Proposed design or throughput capacity changes**

Category	Current design / throughput capacity	Proposed design / throughput capacity	Description of proposed amendment
62	50,000 tonnes per annual period	N/A	N/A

## 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 construction and/or installation and 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
<b>Construction</b>			
Dust	Earthworks and construction of concrete hardstand	Air / windborne pathway causing impacts to health and amenity	No proposed controls.
Noise	Installation of equipment and associated infrastructure; and  Vehicle and equipment movements (including reversing beepers)	Air / windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> <li>• The compaction unit is fabricated offsite but modular assembly / installation will be on site;</li> <li>• The elevated picking line infrastructure will be fabricated off site while assembly will be on site;</li> <li>• The compactor's motor will be operated within an enclosed shed to attenuate noise;</li> <li>• Construction to only occur between the following operational hours:               <ul style="list-style-type: none"> <li>○ 7am to 5pm (Monday to Friday); and</li> <li>○ 7am to 2pm (Saturdays); and</li> </ul> </li> <li>• Compliance with the <i>Environmental Protection (Noise) Regulations 1997 (WA)</i> (EP (Noise) Regulations).</li> </ul>
<b>Operation</b>			
Discharge of fuel	Operation of a fuel tank.	Overland runoff or infiltration through soil potentially causing ecosystem disturbance or impacting surface water quality	17,400L capacity within a bunded concrete hardstand.

Emission	Sources	Potential pathways	Proposed controls
Noise	<p>Acceptance and segregation of waste (from a height to the floor) via the elevated picking station and associated infrastructure; and</p> <p>Transportation of materials around the premises and operation of equipment (including reversing alarms).</p>	Air / windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> <li>• Separation and segregation of wastes to occur within the existing waste acceptance shed;</li> <li>• Waste acceptance, segregation to only occur between the following operational hours: <ul style="list-style-type: none"> <li>○ 7am to 5pm (Monday to Friday); and</li> <li>○ 7am to 2pm (Saturdays); and</li> </ul> </li> <li>• Compliance with the <i>Environmental Protection (Noise) Regulations 1997 (WA)</i> (EP (Noise) Regulations).</li> </ul>
Noise	Compaction of non-recyclable waste(s)	Air / windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> <li>• Compaction unit located on the north side of the building;</li> <li>• Separation distances to sensitive receptors;</li> <li>• The compaction unit power pack will also be in an enclosed shed to mitigate noise and existing buildings and distance to receptors will provide attenuation;</li> <li>• Restricted waste sorting to daytime hours, and no operations on Sundays or public holidays;</li> <li>• Mobile plant is regularly serviced in accordance with manufacturer specifications;</li> <li>• All trucks in the PBH and IWM fleet (principal delivery vehicles) and mobile plant use broadband reversing alarms to avoid tonal alarms that are audible at considerable distances; and</li> <li>• Compliance with the EP (Noise) Regulations.</li> </ul>
Windblown waste	Compaction of wastes outside of the waste sorting shed.	Air / windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> <li>• The waste is discharged from the trucks directly on the floor the enclosed main shed;</li> <li>• All waste, including litter generating residues, is handled and temporarily stored within the enclosed building;</li> <li>• Loading of outbound materials is also undertaken inside the building (whether into containment bins for recycling, or the enclosed compaction unit for disposal);</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> <li>• The out-going materials are contained (covered) to reduce loss of load;</li> <li>• The building roller door is shut outside operating hours;</li> <li>• The facility is surrounded by tall buildings and fences, which provides shelter from prevailing winds;</li> <li>• The perimeter of the premises is fenced with 1.8m high fencing where abutting unaffiliated facilities;</li> <li>• The operational areas are cleaned regularly, and litter identified outside is returned to the building as part of the house-keeping practices; and</li> <li>• Vehicles that exit the shed inspect their vehicles for residual litter prior to leaving the Premises.</li> </ul>
Dust	Compaction of non-recyclable waste(s) outside of the waste sorting shed	Air / windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> <li>• Waste acceptance, processing and handling of waste materials are undertaken in an enclosed building with dust suppression sprinklers;</li> <li>• Faulty dust suppression sprinklers are replaced when required;</li> <li>• Materials primarily containing Inert Type 1 C&amp;D wastes (sand, building rubble, concrete etc) are preferentially sent to Waste Care, an affiliated neighbouring C&amp;D processing facility, thereby reducing likelihood of dust generation on site at PBH;</li> <li>• The premises is not authorised to crush Inert Type 1 wastes;</li> <li>• The main shed has a comprehensive dust suppression system, consisting of fine water sprayers installed in the roof of the building. The system is automated to enable running at pre-set times, but it can also be overridden manually when needed. Reticulated scheme water is used; and</li> <li>• If dust is seen to be blowing out of the shed (particularly when windy), the roller door will be closed (or partially closed) while the dust suppression controls the emissions.</li> </ul>
Asbestos	Compaction of non-recyclable waste(s) outside of the waste sorting shed	Air / windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> <li>• Asbestos to be managed in accordance with the DWER approved AMP.</li> <li>• No screening of asbestos occurs on the Premises due to space limitations.</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
Contaminated particulate matter (Smoke)	Fire incident caused by: <ul style="list-style-type: none"> <li>• sparks generated from mechanical equipment;</li> <li>• non-conforming waste hidden in loads and/or incompatible waste types mixing;</li> <li>• non-conforming waste being compacted e.g. lithium-ion batteries, aerosol cans etc;</li> <li>• Unauthorised access causing arson</li> </ul>	Air/windborne pathway causing impacts to health, welfare and amenity	<ul style="list-style-type: none"> <li>• Sorting of incoming waste as soon as practical after arrival to identify and isolate waste that present a source of ignition;</li> <li>• Sorted recyclable materials (including those that are flammable) are stored in bunkers separated by concrete walls, or in appropriate bins;</li> <li>• Stored materials are not stockpiled too high in the shed to reduce risk of any fire damaging the building and roof structure;</li> <li>• The facility is manned during operating hours and so operators can immediately commence extinguishment of any fire;</li> <li>• Fire extinguishers are strategically mounted in different sections of the premises, including the main shed.</li> <li>• A fire hose reel is also located near the building entry point;</li> <li>• An emergency water standpipe is located directly south-west of the main shed;</li> <li>• A sprinkler system mounted in the roof for dust suppression and assist with fire suppression; and</li> <li>• 10 thermal sensors have been installed in the roof of the building. These are monitored by a control station 24/7. Activation (including identification of faulty sensors) will be detected immediately, and the appropriate emergency response service engaged. The sensors automatically trigger an alarm when they reach 58 degrees Celsius.</li> </ul>
Fire wash waters	Fire incident caused by sparks from equipment and/or as a result of non-conforming waste being compacted e.g. lithium-ion batteries, aerosol cans etc.	Overland runoff or infiltration through soil potentially causing ecosystem disturbance or impacting surface water quality	No controls proposed.
Leachate	Compaction of non-recyclable waste(s) outside of the	Overland runoff or infiltration through soil potentially	<ul style="list-style-type: none"> <li>• Any liquids generated (minimal expected) will fall through a chute and be captured within a receiving bin, which will be disposed through a liquid waste contractor as</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
	waste sorting shed	causing ecosystem disturbance or impacting surface water quality	<p>required;</p> <ul style="list-style-type: none"> <li>• With the inclusion of the compaction unit located outside of the shed, an impervious (concrete floor with bunding will reduce risk of any leachate loss);</li> <li>• The compactor has a collection chute from which leachate can be collected in a leak-proof container below the unit;</li> <li>• External areas are graded so that stormwater does not enter the building; and</li> <li>• Non-recyclable waste(s) removed from the Premises within 48 hours of acceptance at the Premises.</li> </ul>
Odour		Air / windborne pathway causing impacts to health and amenity	<ul style="list-style-type: none"> <li>• Incoming wastes are screened (at delivery and bulk sorting);</li> <li>• Putrescible wastes do not present a major component of the waste stream and is not authorised to increase above the current 15,000 tpa approval;</li> <li>• Odorous waste types are either rejected or removed from the Premises on a priority basis to an authorised facility;</li> <li>• Putrescible wastes (green waste and putrescibles such as food waste) are accepted within an enclosed building and removed from site for secondary processing / for disposal within 24 hours of delivery;</li> <li>• The tipping floor is regularly washed down to remove any build-up of residue that could give rise to odours;</li> <li>• The wash water is collected in a sump located in the floor, which is vacuum pumped when reaching capacity (or deemed odorous);</li> <li>• The main shed roller shutter door is kept completely closed outside of facility operating hours;</li> <li>• The main shed roller door can also be closed if unreasonable odours are experienced outside the shed / Premises until the source of odour is controlled;</li> <li>• Should odours persist after removal of odorous materials, odour suppressors/ deodourisers could be sprayed into the shed in accordance with manufacturer specifications; and</li> <li>• The site maintains a complaint register to record complaints and associated</li> </ul>



Emission	Sources	Potential pathways	Proposed controls
			management responses. Office staff also provide feedback to operations if odours are detected (operators may become desensitized).
Contaminated wastewater	Operation of the existing truck wash area and triple oil interceptor unit.	Overland runoff or infiltration through soil potentially causing ecosystem disturbance or impacting surface water quality	Under roof on a concrete hardstand and collection sump (which is periodically cleaned out by a controlled waste operator).

### 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 areas	600m directly north (from Premises boundary to residential premises boundary) and 992m south-west of the premises.
Commercial premises	<100m north and north-east of the premises.
Industrial premises	0m from premises boundary to immediately surrounding Industrial premises (L8397, L7932, L7742).
Environmental receptors	Distance from prescribed activity
Stormwater compensation basin	0m directly north of premises boundary.
Soak wells	Within Premises boundary.
Open stormwater network (Bayswater Drain)	300m to the east of the Premises.
Underlying groundwater (via onsite soak wells)	13m Below ground level.

Swan River

1.8km (from Premises boundary to Swan River) and indirectly connected via open stormwater drains, piped stormwater drains and compensation basins.

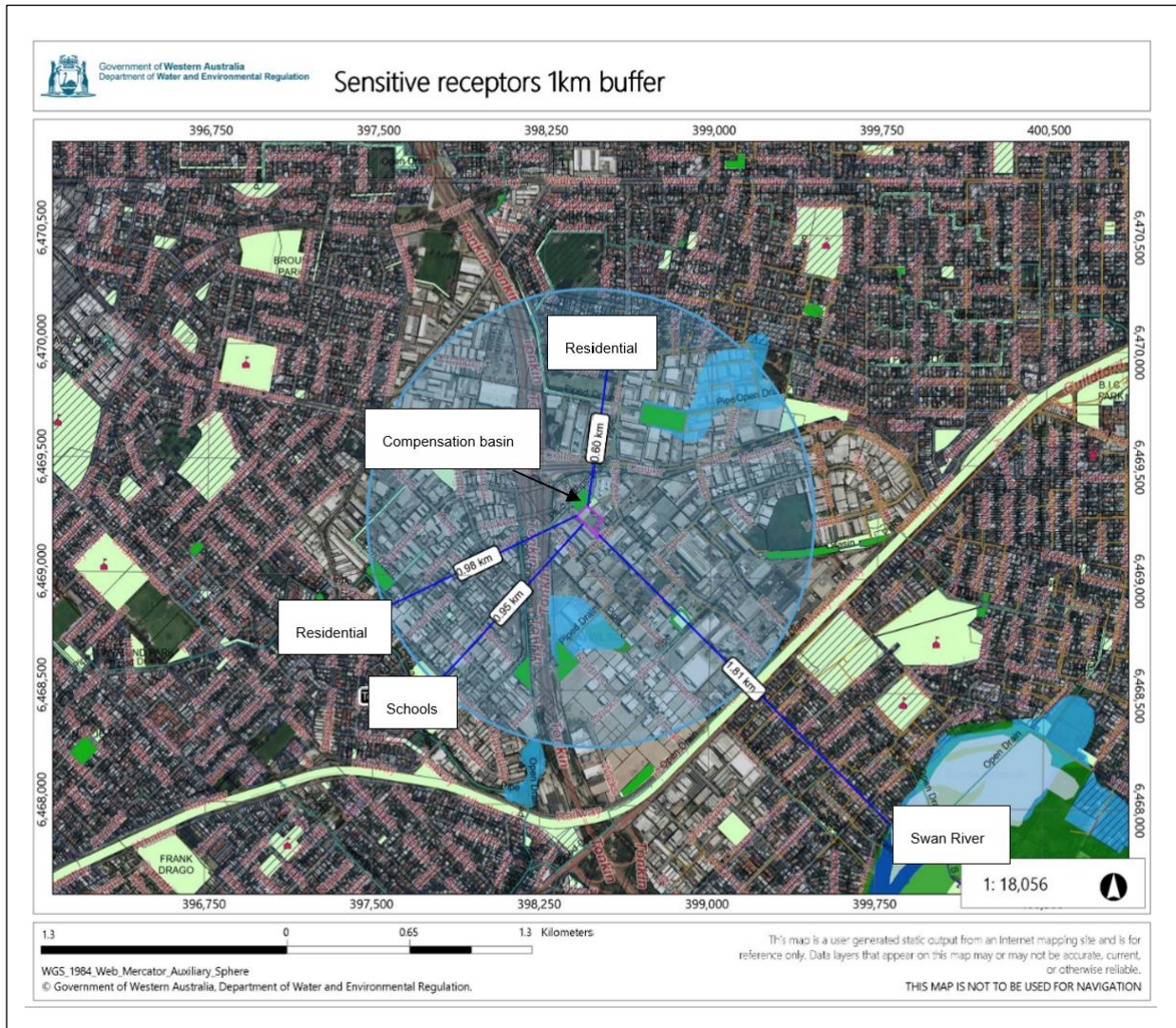


Figure 1: Distance to sensitive receptors

## 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 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 L8589/2011/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. waste sorting and compaction activities.

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 construction and operation**

Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of Licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
<b>Construction</b>								
Construction of a concrete hardstand and installation of an elevated picking station and compactor unit at the rear of the Premise's waste acceptance shed.	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 400m north and 992m south-west; Schools 992m south-south-west; Commercial and industrial premises immediately surrounding the Premises; and Compensation basin 0m directly north of Premises boundary.	No proposed controls	C = Minor L = Possible <b>Medium Risk</b>	N	<b><u>Conditions 1 (Table 1).</u></b>	Additional conditions were placed upon the Licence to reduce the impact of dust upon sensitive receptors during construction and/or installation activities
Construction of a concrete hardstand and installation of an elevated picking station and compactor unit at the rear of the Premises waste processing shed.	Noise	Air / windborne pathway causing impacts to health and amenity	Residences 400m north and 992m south-west; Schools and commercial and industrial premises immediately surrounding the Premises.	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	N	N/A	The Noise Assessment submitted to support the application was prepared by a person qualified and experienced in environmental noise assessment. The assessment predicted the noise emissions from the Premises will comply with the assigned levels in the EP (Noise) Regulations.  The noise levels modelled at the residential receptor 600m north of the Premises were

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of Licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								below the relevant assigned levels.  The Delegated Officer considers that the provisions of the <i>Environmental Protection (Noise) Regulations 1997</i> are sufficient to regulate noise emissions during construction and installation activities.
<b>Operation</b>								
Operation of fuel tank.	Fuel	Overland runoff, infiltration via soil potentially causing ecosystem disturbance or impacting surface water quality	Compensation basin 0m to North; Soak wells located on the Premises; Groundwater 13mbgl; and Open stormwater drain 300m west.	14,700L capacity within a bunded concrete hardstand.	C = Moderate L = Possible <b>Medium Risk</b>	N/A	N/A	Storage fuel is regulated by Department of Mines, Industry Regulation and Safety.  The Delegated Officer considers that the provisions of the EP Act and the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> are sufficient to regulate discharges of fuel.
Acceptance loading and segregation of waste via the elevated picking station; and Vehicle and	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 400m north and 992m south-west; Commercial and industrial premises immediately surrounding the	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	N	<b><u>Conditions 5 (Table 2, Row 1)</u></b> <b><u>Conditions 8 (Table 4, Rows 1 and</u></b>	The Licence Holder's proposed controls were applied to the Licence to reduce the risk of dust impacting upon sensitive receptors.  Additional stockpile

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of Licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
equipment movements			Premises; Compensation basin 0m to North; and Open stormwater drain 300m west.				<u>2)</u>	management regulatory controls were added to minimise the risk of dust emissions during acceptance, loading and segregation of waste.
Acceptance loading, sorting and segregation, of waste; and Movement of material around the Premises including vehicle and equipment movements.	Asbestos	Air / windborne pathway causing impacts to health and amenity	Residences 400m north and 992m south-west; Schools 992m south-south-west; Commercial and industrial premises immediately surrounding the Premises; Compensation basin 0m north; Open stormwater drain 300m west	Refer to Section 3.1	C = Severe L = Rare <b>High Risk</b>	N	Conditions 5 (Table 2, Row 2) and Condition 6. <b><u>Conditions 15 to 23</u></b>	The Licence Holder proposed controlling asbestos via existing condition 5 which required asbestos to be managed in accordance with the Perth Bin Hire, 21 October 2014, Asbestos Management Plan (AMP), Perth, Western Australia. The Delegated Officer notes the AMP has not been updated for 9 years and was no longer consistent with the DWER, 2021, <i>Guidelines: Managing asbestos at construction and demolition waste recycling facilities</i> , Perth, Western Australia. Additional conditions (15 to 23) were included in the licence in accordance with <i>Guideline: Managing asbestos at construction and demolition waste recycling facilities</i> (April 2021).

Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of Licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Acceptance loading and segregation of waste via the elevated picking station; and Vehicle and equipment movements	Noise	Air / windborne pathway causing impacts to health and amenity	Residences 400m north and 992m south-west; and Commercial and industrial premises immediately surrounding the Premises.	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	<b><u>Condition 5 (Table 2, Row 1 (d), Row 2 &amp; Row 3)</u></b> <b><u>Condition 8 (Table 4, Rows 1, 2 &amp; 4)</u></b>	The Licence Holder's proposed controls pertaining to noise were included on the Licence to reduce the impact of noise on sensitive receptors.  The Noise Assessment submitted to support the application was prepared by a person qualified and experienced in environmental noise assessment. The assessment predicted the noise emissions from the Premises will comply with the assigned levels in the EP (Noise) Regulations.
Compaction and storage of non-recyclable waste; and Vehicle and equipment movements	Odour	Air / windborne pathway causing impacts to health and amenity	Residences 400m north and 992m south-west; and Commercial and industrial premises immediately surrounding the Premises.	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	<b><u>Condition 8 (Table 4, Rows 6-8)</u></b>	The Licence Holder's proposed controls were included on the Licence to reduce the impact of odour on sensitive receptors.
	Windblown waste	Air / windborne pathway causing impacts to health and amenity	Stormwater compensation basin 0m north of Premises; Open stormwater drain 300m west; and	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Condition 9. <b><u>Condition 5 (Table 2, Row 1 (m))</u></b> <b><u>Condition 8</u></b>	The Licence Holder's proposed controls were included to mitigate the risk of windblown waste impacting upon sensitive receptors.

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of Licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
			Swan River 1.8km south-east.				<u>(Table 4, Row 8 (e))</u>	
	Leachate	Overland runoff, infiltration via soil potentially causing ecosystem disturbance or impacting surface water quality	Compensation basin 0m to North; Soak wells located on the Premises; Groundwater 13mbgl; and Open stormwater drain 300m west.	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	<u>Conditions 8 (Table 4, Row 8)</u>	The Licence Holders proposed controls to manage contaminated stormwater at the Premises were included on the Licence to lower the risk of contaminated stormwater impacting upon sensitive receptors.
Fire incident caused by sparks from equipment and/or as result of non-conforming waste being compacted e.g. lithium-ion batteries, aerosol cans etc.	Light & heat Contaminated particulate matter (smoke and/or gases)	Combustion & Air / windborne pathway causing impacts to health and amenity	Residences 400m north and 992m south-west; Schools 992m south-south-west; Commercial and industrial premises immediately surrounding the Premises.	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 2, 7 & 9. <u>Condition 2 (Table 2)</u> <u>Conditions 12 to 14</u>	The Licence Holders proposed fire controls were included on the Licence to reduce the risk of smoke and/or gases impacting upon sensitive receptors in the event of a fire.
	Fire wash-waters	Overland runoff or infiltration through soil potentially causing ecosystem disturbance or impacting surface and/or	Stormwater compensation basin 0m north of Premises; Soak wells located on Premises; Groundwater 13m bgl; Open stormwater drain 300m west of	No proposed controls	C = Moderate L = Unlikely <b>Medium Risk</b>	N	<u>Condition 14(c)</u>	Condition 14(c) has been added to ensure that recoverable fire-fighting water is disposed of to a suitably licensed premises.



Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of Licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
		ground water quality.	Premises; and Swan River 1.8km south-east.					
Operation of a truck wash bay and a waste oil triple interceptor unit.	Contaminated wastewater.	Overland runoff or infiltration through soil potentially causing ecosystem disturbance or impacting surface and/or ground water quality.	Stormwater compensation basin 0m north of Premises; Groundwater 13m bgl; Open stormwater drain 300m west of Premises; and Swan River 1.8km south-east.	Under roof on a concrete hardstand and collection sump (which is periodically cleaned out by a licensed controlled waste operator).	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	<b><u>Condition 5 (Table 2, Row 4)</u></b>	The Licence Holder's proposed operational controls were applied to the Licence to control the risk of contaminated wastewater from the activity of washing trucks impacting upon sensitive receptors.

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
Local Government Authority advised of proposal on 19/04/2022	No comment on the application.	N/A
Licence Holder was provided with draft amendment on 13 June 2022	Refer to Appendix 1	Refer to Appendix 1

## 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
-	Condition 1 removed from Licence, adequately captured by legislation and regulations.
-	Condition 2 removed from Licence, adequately captured by legislation and regulations.
1.	Inclusion of infrastructure design and installation requirements.
2 to 4	Inclusion of Environmental Compliance Reporting requirements and Environmental Commissioning Requirements.
5.	Inclusion of infrastructure and equipment management and maintenance controls.
6.	Numbering updated and updating of waste acceptance table to department's current format.
7.	Numbering updated and timeframe included on condition for enforceability.
8.	Numbering updated and inclusion of process limits and specifications.

9.	Numbering updated and condition amended to reflect the current security measures implemented at the Premises and inclusion of a timeframe for enforceability.
10.	Numbering updated.
11.	Numbering updated and condition amended to current department wording format.
12 to 14	Inclusion of Fire Risk Prevention and Management controls.
15 to 23	Inclusion of Asbestos Management (inspection and management) controls.
24.	Inclusion of monitoring of fire wash waters removal from the Premises, in the event of a fire.
25.	Numbering updated.
26.	Numbering updated.
27.	Numbering updated.
28.	Annual Audit Compliance Report updated in accordance with the departments Reduced Reporting project from 30 days to 90 days.
29.	Removal of Annual Environmental Report, reporting requirements in accordance with the departments Reduced Reporting project.
30.	Removal of Annual Environmental Report, reporting requirements in accordance with the departments Reduced Reporting project.
31.	Removal of Notification (N1) requirements, as adequately captured by section 72 of the EP Act.
-	Numbering updated; and Definitions updated to include definitions of: <ul style="list-style-type: none"> <li>• ACM</li> <li>• Asbestos fines or fibres</li> <li>• Damp</li> <li>• Delivery vehicle</li> <li>• Fibrous asbestos</li> <li>• Inspector</li> <li>• Non-recyclable</li> <li>• Operational hours</li> </ul>
-	Updated Premises boundary Map in Schedule 1.
-	Inclusion of Conceptual Site Plan in Schedule 1.

-	Inclusion of Equipment /Infrastructure map in Schedule 1.
-	Inclusion of side view of compactor and associated infrastructure in Schedule 1.
-	Inclusion of Technical specifications of elevated picking line and associated infrastructure.
-	Inclusion of Technical specifications for the compactor.
-	Inclusion of Asbestos risk classification procedure in Schedule 2.
-	Inclusion of High risk load in Schedule 3.
-	Removal of Notification Form (N1) from Licence.

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. DER 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
3. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Decision Making*, Perth, Western Australia
5. DWER 2019, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western
6. Australia Department of Health 2021, *Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia*, Perth, Western Australia.
7. DWER 2021, *Guidelines: Managing asbestos at construction and demolition waste recycling facilities*, Perth, Western Australia.

## Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
Condition 1 (Table 1, Column 5)	<p>Rescheduling of works to have this completed within next 30 days may not be feasible. PBH would prefer to have the timeframe extended to at least 60 days if this requirement is to be kept. PBH questions the relevance of an imposed timeframe when a condition already exists stating infrastructure cannot be used until the compliance documentation is provided.</p>	<p>Noted and amended accordingly.</p> <p>The imposed timeframe is to ensure construction and/or installation of infrastructure is undertaken within a measurable and reasonable timeframe.</p>
Condition 5 (Table 2, Row 1 (j))	<p>Sprinklers are currently used periodically when needed to dampen dusty loads (e.g. load containing saw dust). All the processing activities (sorting) is being undertaken in an enclosed shed, reducing risk of emissions to the environment.</p> <p>PBH presumes this requirement was included to address acceptance / processing of construction and demolition (C&amp;D) material. Loads of C&amp;D materials are diverted to Waste Care at 50 Clune Street before reaching the site as a standard operational practice to reduce double-handling of materials and the risk associated with potential dust and asbestos exposure.</p> <p>Incoming wastes are principally commercial and industrial (C&amp;I) wastes. It will be impractical to have the sprinklers always operating for this waste stream as recoverable material such as cardboard will unnecessarily be soiled and lose value.</p>	<p>The department considers the proposed amendment acceptable, noting that the requirement to operate the sprinklers during the acceptance of C&amp;D waste has been retained in Table 2 to reference the specific infrastructure.</p>

Condition	Summary of Licence Holder's comment	Department's response
	Should DWER determine to keep this control, it should be specifically stated in the table that the sprinklers are to be operated when receiving C&D waste, otherwise as necessary to control dust.	
Condition 5 (Table 2, Row 1 (I))	Having the sprinkler system now meet the Australian Standard is a new requirement, with the existing sprinkler system installed by the previous licence holder.	The requirement has been amended to ensure that the sprinkler system is maintained in working order, noting that the risk is unchanged through this alteration.
Condition 5 (Table 2, Row 2)	<p>This is not a practical requirement as a section of the fence is being removed between 11 Duffy Street and 50 Clune Street for the works and operations authorised in this amendment.</p> <p>While much of the existing 11 Duffy Street premises boundary, as a minimum is 1.8m high metal ring lock fencing, there are some areas of the existing boundary at 11 Duffy Street that include concrete panel buildings on the boundary and requirement of a 1.8m high fencing in those areas is impractical and redundant if required to be added. 50 Clune Street (Product Recovery Industries (PRI) operating as Waste Care) and Perth Bin Hire are affiliated companies, sharing the same director.</p> <p>The external perimeter fencing for PBH and PRI abutting non-affiliated neighbours is of a minimum standard 1.8m high metal ring lock fence, with most of the boundary fencing being 7m-high colorbond fencing, or concrete walls.</p> <p>It is noted that Condition 9 already stipulates the need to maintain site security fencing to prevent unauthorised access and for the premises to be locked when unattended which PBH believe to be adequate to manage security and contain litter.</p>	The department recognises the current fencing extent across multiple affiliated lots and considers that the existing Condition 9 is sufficient to mitigate security risk, and windblown waste is mitigated as specified in the existing risk assessment. As such, the specific fencing requirement in Condition 5 has been removed.

Condition	Summary of Licence Holder's comment	Department's response
Condition 8 (Table 4, Row 4)	<p>Metals accepted within the waste stream are deposited and sorted in the main shed. The recycled materials are generally taken directly from the shed to the destination.</p> <p>There may be occasion when the hook bin filled with the metal is placed outside the shed while waiting for the logistics of removal from site which this proposed condition does not recognise. Concern is this condition may not be achievable all the time and may cause unjustified compliance issues. Electric cabling, which is inert, is also often stored in a bin outside.</p> <p>This may similarly be the situation for other sorted waste, e.g. a sorted consignment of cardboard (bin), placed outside when it is not raining while the replacement bin is being repositioned, or while the bin waits for a driver to collect the material to be removal.</p>	The department considers the comments acceptable and has amended the requirements for storage.
Condition 8 (Table 4, Row 8)	<p>This requirement may not always be met, resulting in unnecessary compliance issues if interpreted literally.</p> <p>The compactor will be bolted onto the hardstand. It is not moving so it is the only place where compaction can take place. The compaction unit does have leak-proof containers to collect any generated leachate.</p> <p>However, the condition does insinuate that all non-recyclable waste must be compacted. While the intention is to have this happen, there may on occasion be a need to load the waste from within the shed into a different delivery vehicle (e.g. walking floor truck as is currently the practice) if there is an issue with the compactor (e.g. maintenance) / an issue with the availability of compaction trucks / the load contains large / bulky items not suitable for compaction. These alternatives cannot be dismissed, particularly given</p>	The department accepts the issue provided by the licence holder and has amended the requirement to confirm that all non-recyclable waste has to be compacted. Other requirements remain unchanged, including the removal of non-recyclable waste from the premises within 48 hours.



Condition	Summary of Licence Holder's comment	Department's response
	the strict time frames of was waste removal imposed by the licence.	
Condition 8 (Table 4, Row 8)	The compacted waste trucks are fully enclosed by design. It may be better to state that all outgoing waste loads must be covered (which will then include walking floor trailers).	Noted and amended accordingly.
Condition 13	Can the word immediately please be defined (reviewed) as it assumes everything is to be dropped so as to report to DWER. It may prudent to rather report within a timeframe, as the immediate response is to put out an ignition / small fire before it spreads, or prevent further discharges to the environment taking place.	The department agrees and has amended the condition to require that that CEO is notified at the end of the following working day.
Schedule 1 (Figure 2)	Confirmation the blind sump in the wash bay is centrally located as illustrated in the figure 2.	Noted.
N/A	<u>Decision report, page 13:</u> Should refer to conditions 15-18.	Noted and amended accordingly.

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)						
Application type						
Works approval	<input type="checkbox"/>	N/A				
Licence	<input type="checkbox"/>	Relevant works approval number:	Licence	<input type="checkbox"/>	Relevant works approval number:	
		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: N/A				
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:	L8595/2011/1			
		Relevant works approval number:	N/A	N/A	Relevant works approval number:	
Registration	<input type="checkbox"/>	Current works approval number:	Registration	<input type="checkbox"/>	Current works approval number:	
Date application received		17 December 2021				
Applicant and Premises details						
Applicant name/s (full legal name/s)		WM (PBH) PTY LTD				
Premises name		Perth Bin Hire				
Premises location		11 Duffey Street, Bayswater, WA.				
Local Government Authority		City of Baywater				
Application documents						
HPCM file reference number:		2011/007708-1				

Key application documents (additional to application form):	<u>Application 2 (DWER Reference: DWERDT583004):</u> Attachment 1 – Application Form Attachment 2 – Cover Letter Attachment 3 – Supporting Information <u>Application 1 (DWER Reference: A2074736):</u> Attachment 1 – Application Form Attachment 2 – Cover Letter Attachment 3 - Supporting information
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**Scope of application/assessment**

Summary of proposed activities or changes to existing operations.	<ul style="list-style-type: none"> <li>• Installation of a S8000 compaction unit, power pack within an enclosed housing shed and a concrete hardstand, at the rear of the waste acceptance shed;</li> <li>• Installation of the compaction feed hopper within the northern wall of the waste acceptance shed to feed waste through to the compactor;</li> <li>• An elevated picking line and infeed waste hopper, located above the existing bunkers within the waste acceptance shed and conveyor;</li> <li>• Inclusion of proposed fire controls;</li> <li>• Inclusion of existing infrastructure on the Licence (namely; main waste processing shed, plant maintenance shed, front end loader, excavator, outside operating area, sprinkler / misting system in waste acceptance shed, fuel tank, office building and perimeter fencing); and</li> <li>• Inclusion of proposed infrastructure on the Licence.</li> </ul>
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**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
Category 62: Solid Waste Depot: Premises on which waste is stored, or sorted, pending final disposal or re-use, other than in the course of operating - <ul style="list-style-type: none"> <li>(a) A refund point (as defined in the <i>Waste Avoidance Resource Recovery Act 2007</i> section 47C(1)) (a <b>refund point</b>); or</li> <li>(b) A facility or other place (an <b>aggregation point</b>) for the aggregation of containers that have been returned to refund points until those containers are accepted for processing or disposal.</li> </ul>	50,000 tonnes per annual period.	N/A

**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: N/A <del>Managed under Part V</del> <input type="checkbox"/> <del>Assessed under Part IV</del> <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: N/A EPA Report No: N/A
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No: N/A
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 checked="" type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	Approval: DA13-0822 (A786911) Expiry date: No expiry date is listed on Development Approval.
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"/>	CPS No: N/A No clearing is proposed.
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"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
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"/>	Application reference No: N/A Licence/permit No: N/A Licence / permit not required connected to reticulated water.
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"/>	Name: N/A Type: N/A Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>

Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: N/A Are the proposed activities/landuse compatible with the PDWSA (refer to <a href="#">WQPN 25</a> )? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i> )	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	The <i>Environmental Protection (Controlled Waste) Regulations 2004</i> ; The <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> ; and The <i>Environmental Protection (Noise) Regulations 1997</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"/>	Classification: N/A Date of classification: N/A