



## Application for Licence Amendment

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

---

<b>Licence Number</b>	L8651/2012/1
<b>Licence Holder</b>	Waroona Resources Pty Ltd
<b>ACN</b>	169 962 421
<b>File Number</b>	DWERVT16867~4 and APP-0026255
<b>Premises</b>	Premium Waste Management Lot 15 Richards Road WAROONA WA 6162  Legal description – Lot 15 on Deposited Plan 59265 Certificate of Title Volume 2699 Folio 387 As defined by the coordinates in Schedule 2 of the revised licence
<b>Date of Report</b>	14 February 2025
<b>Decision</b>	Revised licence granted

**Melissa Chamberlain**

**MANAGER WASTE INDUSTRIES**

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
2.3 Consolidation of Licence	2
<b>3. Risk assessment</b>	<b>2</b>
3.1 Source-pathways and receptors	3
3.1.1 Emissions and controls	3
3.1.2 Receptors	5
3.2 Risk ratings	7
<b>4. Consultation</b>	<b>10</b>
<b>5. Conclusion</b>	<b>10</b>
5.1 Summary of amendments	10
<b>References</b>	<b>13</b>
Table 1: Prescribed premises category design or throughput capacity changes	2
Table 2: Licences consolidated in this amendment	2
Table 3: Licence Holder controls	3
Table 4: Sensitive human and environmental receptors and distance from prescribed activity	5
Table 5. Risk assessment of potential emissions and discharges from the premises during construction and operation	9
Table 6: Consultation	10
Table 7: Summary of licence amendments	10
Table 8: Consolidation of licence conditions in this amendment	11
Figure 1: Potential receptors surrounding the premises	8

## 1. Decision summary

Licence L8651/2012/1 is held by Waroona Resources Pty Ltd (Licence Holder) for Premium Waste Management (the premises), located at Lot 15 Richards Road, Waroona.

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 L8651/2012/1 has been granted.

The revised licence issued as a result of this amendment consolidates and supersedes the existing licence previously granted in relation to the premises. The revised licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

## 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 16 October 2024, the Licence Holder submitted an application to the department to amend Licence L8651/2012/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Remove the timeframes associated with constructing the remaining area of Hardstand 2 and with constructing Hardstand 3:
  - A stockpile of clay material is currently present where the remaining 14,000 m<sup>2</sup> of hardstand 2 will be located. Clay is only screened and sold from the stockpile on demand, with the remaining section of hardstand not intended to be finished until all of the clay stockpile has been sold.
  - Hardstand 3 is comprised of recycled road base and drainage aggregate. Construction of the hardstand only occurs when material is available for use, so construction is still ongoing and may take years to complete depending on material availability.
  - Specified timeframes were derived from the timeframe estimates put in the initial application form.
- Include construction conditions for the remaining inert landfill cells 7, 8, 9, 10 and 11 under Works Approval W6362/2020/1:
  - The works approval is due to expire on 10 May 2025 and construction of the remaining cells can be managed by specifying the construction and compliance conditions in the licence. Most of the requirements in W6362/2020/1 are for time-limited operations and are already contained in the licence.
- Update the registered business address:
  - The registered business address for Waroona Resources Pty Ltd was changed on 19 July 2024.

This amendment is limited only to changes to conditions in the existing licence. No changes to the existing categories or category design/production capacities have been requested by the Licence Holder. Table 1 below outlines the proposed changes to the existing licence.

**Table 1: Prescribed premises category design or throughput capacity changes**

Category	Current production or design capacity	Proposed production or design capacity	Description of proposed amendment
<b>Category 13:</b> Crushing of building material	50,000 tonnes per annual period	No change	Remove timeframe for construction of Hardstand 3
<b>Category 61A:</b> Solid waste facility	35,000 tonnes per annual period	No change	Remove timeframe for construction of remaining portion of Hardstand 2
<b>Category 62:</b> Solid waste depot	200,000 tonnes per annual period	No change	No change
<b>Category 63:</b> Class I inert landfill site	150,000 tonnes per annual period	No change	Include construction of remaining inert landfill cells 7, 8, 9, 10 and 11 that are currently authorised under Works Approval W6362/2020/1

### 2.3 Consolidation of Licence

As part of this amendment package the department has consolidated the licence by incorporating changes made under the amendments summarised in Table 2.

**Table 2: Licences consolidated in this amendment**

Instrument	Issued	Summary of approval
L8651/2012/1	22/02/2022	Department initiated amendment to align annual reporting dates with Waste Avoidance and Resource Recovery Act 2007 reporting dates.
L8651/2012/1	16/05/2022	Notice of amendment of licence reporting requirements.

The obligations of the Licence Holder have not changed in consolidating the licence. The department 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;
- revised licence condition's numbers and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The full consolidation of licence conditions as they relate to the revised licence are detailed in Section 5.1. Previously issued Amendment Notices will remain on the department's website for future reference and will act as a record of the department's decision making.

## 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 operation which have been considered in this Amendment Report are detailed in Table 3 below. Table 3 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

**Table 3: Licence Holder controls**

Emission	Sources	Potential pathways	Proposed controls
Noise	<p><u>Construction</u></p> <p>Excavation of landfill cells</p> <p>Remaining construction of hardstands 2 and 3</p> <p>Vehicle and machinery movements</p>	Air/windborne	<ul style="list-style-type: none"> <li>All excavation activities are conducted within the pit and are well protected by the north, west and eastern walls.</li> <li>5 m high bund walls surround the south and west premises boundaries, as well as the north pit wall and hardstand areas, to act as a noise barrier to surrounding receptors.</li> <li>Working hours 7am – 4.45pm Monday to Friday and 7am – 11.30am on Saturdays with no work during Sundays and Public Holidays.</li> <li>Machinery is limited to one front end loader loading one truck at a time to minimise machinery noise.</li> </ul>
Dust	<p><u>Operation</u></p> <p>Inert landfill operations</p> <p>Waste processing operations (screening, crushing, shredding, unloading, loading and storage) at hardstands 2 and 3</p> <p>Vehicle and machinery movements</p>		<ul style="list-style-type: none"> <li>Water cart will be used when required.</li> <li>All excavation activities are conducted within the pit and are well protected by the north, west and eastern walls.</li> <li>5 m high bund walls surround the south and west premises boundaries, as well as the north pit wall and hardstand areas, to act as a dust barrier to surrounding receptors.</li> <li>Traffic control to reduce vehicle speed on site.</li> <li>Limiting the surface area of operational areas to minimise dust lift off (progressive vegetation clearing).</li> <li>Capping and revegetation immediately after landfilling has been completed.</li> <li>Activities will be limited during periods of unfavorable wind conditions.</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
Asbestos fibres	Acceptance of asbestos containing material for landfilling	Air/windborne	<ul style="list-style-type: none"> <li>• An Asbestos Management Plan and Asbestos handling procedure are in place to ensure asbestos is handled appropriately and directed to the designated asbestos areas within the landfill.</li> <li>• Waste carriers will require approval and declare if their load is containing or at risk of containing asbestos prior to entering the landfill.</li> <li>• On entry, all trucks carrying asbestos waste contained in loose loads (not wrapped sheets, i.e. mixed in soil or construction waste) must have wetted down loads that are tarped or enclosed in a bin.</li> <li>• Trucks are directed to a designated asbestos area where loads are un-tarped or tipped only when wind conditions permit and when the water cart is present for wetting down the load during tip off.</li> <li>• Cover is applied directly to asbestos loads. A stockpile of cover material will be stored next to the designated asbestos area so a dozer can access and push over after each tip at a minimum of 300mm thick.</li> <li>• Large solid pieces of cement bonded asbestos are to be doubled wrapped in black plastic sheeting (&lt;200 µm thick) and labeled 'CAUTION ASBESTOS' and disposed of within the designated asbestos area.</li> </ul>
	Processing of inert waste material contaminated with asbestos		<ul style="list-style-type: none"> <li>• An Asbestos Management Plan and Asbestos handling procedure are in place to ensure material to be crushed does not contain asbestos.</li> <li>• Material is inspected prior to being accepted for crushing.</li> <li>• Evidence of ACM results in entire load being wet down and removed.</li> <li>• Once crushed, material is tested for asbestos contamination.</li> <li>• Separation of stockpiles tested and awaiting testing for ACM by concrete bunds reduces the risk of cross contamination.</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
Leachate and potentially contaminated stormwater	Inert landfill operations Waste processing operations (screening, crushing, shredding, unloading, loading and storage) at hardstands 2 and 3 Vehicle movements	Surface runoff Seepage through soil to groundwater and migration in groundwater	<ul style="list-style-type: none"> <li>Only inert waste (low potential for producing leachate) will be disposed of within the landfill.</li> <li>Inspection procedures are in place to ensure non-conforming waste (that could produce leachate) is not disposed of within the landfill.</li> <li>Stormwater will be diverted away from the east landfill wall and the west sand quarry wall away from the landfill cells.</li> <li>Base of the landfill cells will be kept at a minimum depth of 2m above the groundwater table.</li> <li>Special waste type 1 and inert waste type 2 are required to be covered immediately or by the end of the working day in which the waste was deposited.</li> <li>The landfill will be progressively capped as the final design profile is reached, the capped landfill will be rehabilitated immediately following the construction of capping layer.</li> </ul>

### 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 4 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 4: Sensitive human and environmental receptors and distance from prescribed activity**

Receptors	Distance from prescribed activity
<b>Human receptors</b>	
<b>Closest sensitive receptor –</b> Rural residential homestead	Approximately 690 m northeast of the premises boundary

Receptors	Distance from prescribed activity
<p><b>Sensitive receptors –</b> Rural residential homesteads</p>	<p>There are six additional rural residential homesteads located within 2 km of the premises boundary:</p> <ul style="list-style-type: none"> <li>- 920 m northeast</li> <li>- 1.05 km south</li> <li>- 1.19 km north</li> <li>- 1.24 km northwest</li> <li>- 1.76 km south-southwest</li> <li>- 1.88 km southeast</li> </ul>
<p><b>Closest industrial receptor –</b> Putrescible landfill premises (L6756/1996/11)</p>	<p>Approximately 610 m southeast of the premises boundary</p>
<p><b>Environmental receptors</b></p>	
<p><b>Underlying groundwater –</b> Superficial Swan aquifer of the proclaimed Murray Groundwater Area</p>	<p>The highest levels of groundwater measured in each monitoring bore at the premises since 2019 are; 11.36 mAHD (Bore SE1), 11.26 mAHD (Bore SE2), 12.98 mAHD (Bore SE3) and 12.46 mAHD (Bore SE4). The monitoring bores are situated around the inert landfill which is located in the central north and northeastern part of the premises.</p> <p>Monitoring and compliance reporting by the Licence Holder indicates that groundwater is located between approximately 11.4 to 12.6 mAHD across the landfill area and the base of the landfill cells are situated 2 m above groundwater.</p> <p>Hardstand area 2 and 3 are located in the lower lying western and southwestern parts of the premises, where groundwater is estimated to be approximately 2 to 8 mbgl.</p> <p>Groundwater flow direction at the premises is inferred to be generally in a westerly direction, however winter recharge from a wetland within the centre of the premises can cause localised changes to groundwater flow direction in July to September.</p> <p>There are three licensed groundwater users within 2 km of the premises. One of these users is located downgradient from the premises (GWL160015(2)), however abstraction occurs from the confined lower Leederville aquifer. The remaining users are located upgradient to the southeast (GWL163275(2) and GWL97851(3)).</p>
<p><b>Surface water –</b> Manmade drainage channels, canals and dams</p>	<p>Multiple manmade drainage channels and canals are located within 2 km of the premises, with the closest drain located adjacent to the premises boundary, approximately 15 m south of the bund around hardstand 3. The drain extends 75 m to the southwest to an earthen farm dam.</p> <p>The premises and surrounds are within the policy area of the <i>Environmental Protection Peel Inlet – Harvey Estuary Policy 1992</i>.</p>



Receptors	Distance from prescribed activity
<p><b>Geomorphic wetlands of the Swan Coastal Plain –</b> Basin sumplands, basin damplands and flat palusplains</p>	<p>Multiple use category basin sumplands and flat palusplains are located within 2 km of the premises, with the closest being a basin sumpland located in the central area of the premises, between the transfer station, greenwaste hardstand and landfill area.</p>
	<p>Resource enhancement category basin sumplands and damplands are located within 2 km of the premises, with the closest being a basin sumpland located within the western margin of the premises, immediately adjacent to the west of hardstand area 3.</p>
	<p>Conservation category basin sumplands and damplands are located within 2 km of the premises, with the closest being approximately 100 m east of the premises boundary.</p>
<p><b>Conservation and Land Management Act 1984 Nature Reserve –</b> Buller Nature Reserve</p>	<p>Approximately 885 m southeast of the premises boundary</p>
<p><b>Threatened (TEC) and Priority (PEC) Ecological Communities –</b> Banksia Dominated Woodlands of the Swan Coastal Plan IBRA Region</p>	<p>Occurrences of the ecological community are located within the premises and surrounding area.</p>
<p><b>Native vegetation –</b> Comprising potential habitat for threatened and priority flora and fauna species due to multiple records being identified in the surrounding area</p>	<p>Native vegetation is located within the central areas of the premises as well as the eastern and western boundaries. Vegetation in the eastern edge of the premises is continuous with a large patch of native vegetation which eventually joins with the Buller Nature Reserve.</p>

### 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 in-complete 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 5.

The Revised Licence L8651/2012/1 that accompanies this Amendment Report authorises emissions associated with the operation of the premises i.e. inert landfilling, solid waste processing and construction and demolition waste processing activities.

The conditions in the revised licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

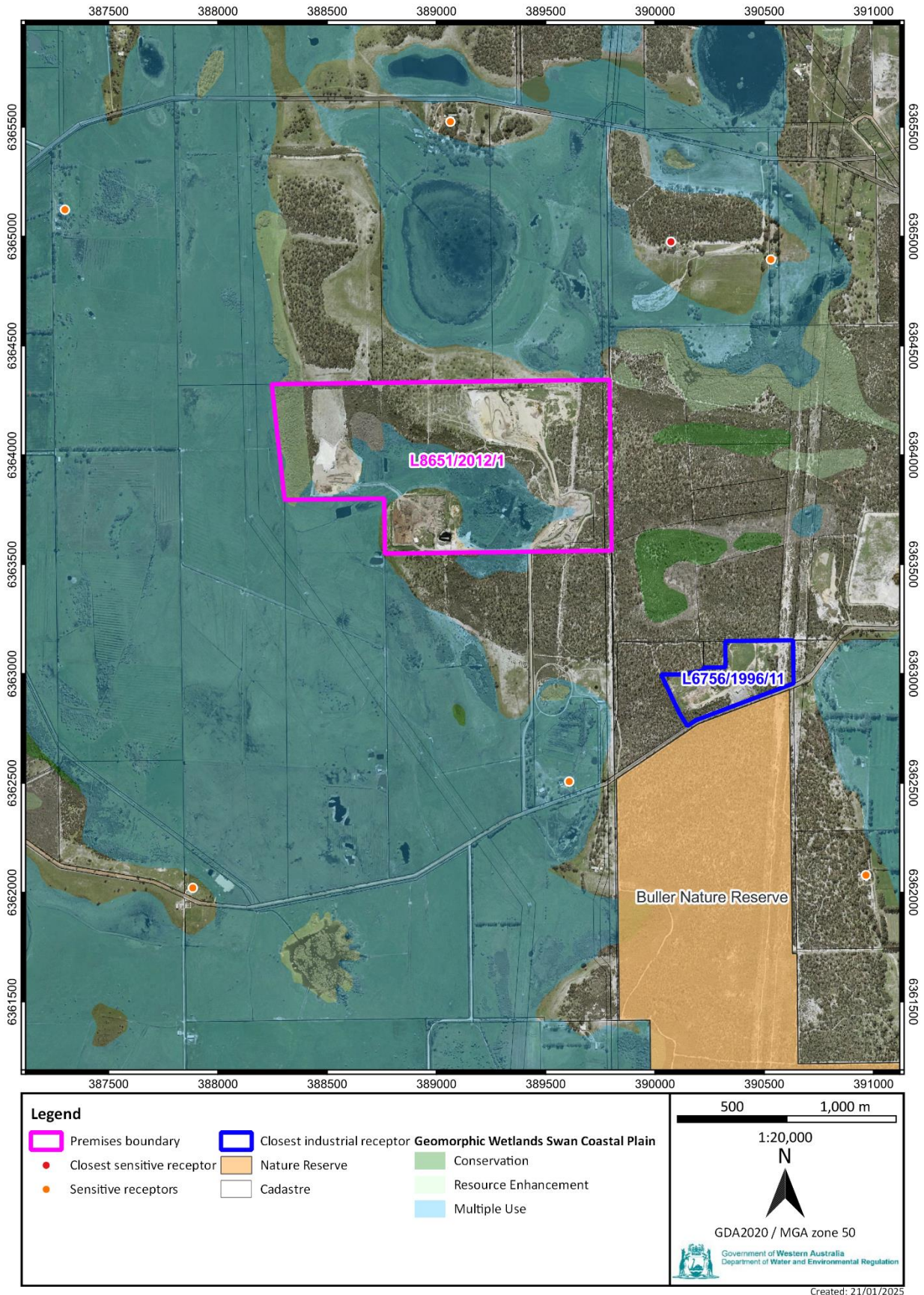


Figure 1: Potential receptors surrounding the premises



**Table 5. Risk assessment of potential emissions and discharges from the premises during construction and operation**

Risk Event					Risk rating <sup>1</sup>	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood			
<b>Construction</b>								
Excavation of landfill cells Remaining construction of hardstands 2 and 3	Noise	<b>Pathway:</b> Air/windborne pathway	Rural residential homesteads	Refer to Section 3.1.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	N/A	The Environmental Protection (Noise) Regulations 1997 applies.
	Dust	<b>Impact:</b> Health and amenity		Refer to Section 3.1.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	32	As there are no proposed changes to construction activities from those previously assessed, the Delegated Officer considers that the inclusion of dust management conditions from Works Approval W6362/2020/1 are sufficient regulatory controls for the risk event.
<b>Operation</b>								
Inert landfill operations Waste processing operations (screening, crushing, shredding, unloading, loading and storage) at hardstands 2 and 3 Vehicle movements	Noise	<b>Pathway:</b> Air/windborne pathway	Rural residential homesteads	Refer to Section 3.1.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	1, 23, 28	The Environmental Protection (Noise) Regulations 1997 applies.
	Dust	<b>Impact:</b> Health and amenity		Refer to Section 3.1.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	1, 2, 5, 10, 12, 13, 23, 28	As there are no proposed changes to operations that were previously assessed, the Delegated Officer considers that existing conditions contained within the licence are sufficient.
	Asbestos fibres	<b>Pathway:</b> Air/windborne pathway <b>Impact:</b> Health		Refer to Section 3.1.1	C = Major L = Unlikely <b>Medium Risk</b>	Y	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 17, 18, 22	As there are no proposed changes to operations that were previously assessed, the Delegated Officer considers that existing conditions contained within the licence are sufficient.
Inert landfill operations Greenwaste processing at hardstand 2	Leachate and potentially contaminated stormwater	<b>Pathway:</b> Surface runoff <b>Impact:</b> Ecosystem disturbance or impact to water quality	Geomorphic wetlands Native vegetation / Banksia Dominated Woodlands of the Swan Coastal Plan IBRA Region Drainage channels and farm dam	Refer to Section 3.1.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	1, 2, 3, 10, 13, 19, 20, 21, 28, 29, 30, 31	As there are no proposed changes to operations or infrastructure design from those previously assessed, the Delegated Officer considers that the inclusion of construction related conditions from Works Approval W6362/2020/1 along with existing licence conditions are sufficient regulatory controls for the risk event.
		<b>Pathway:</b> Seepage through soil to groundwater and migration in groundwater <b>Impact:</b> Soil contamination, ecosystem disturbance or impact to water quality	Underlying groundwater Geomorphic wetlands Native vegetation / Banksia Dominated Woodlands of the Swan Coastal Plan IBRA Region	Refer to Section 3.1.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y		

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 or existing regulatory controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

Licence: L8651/2012/1

## 4. Consultation

Table 6 provides a summary of the consultation undertaken by the department.

**Table 6: Consultation**

Consultation method	Comments received	Department response
Local Government Authority advised of proposal (19 December 2024)	<p>The Shire of Waroona replied on 14 January 2025 advising that they do not have any concerns or comments regarding the proposed amendments as they are consistent with the existing shire development approvals in place. These are as follows:</p> <ul style="list-style-type: none"> <li>• Extractive Industry TP2150 (E127) – expires 22 September 2025; and</li> <li>• Landfill Site (TP1234).</li> </ul>	Noted.
Licence Holder was provided with draft amendment on 5 February 2025	The Licence Holder responded on 11 February 2025 that they would like to proceed with the proposed amendments and waive the remainder of the consultation period.	Noted.

## 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 7 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 7: Summary of licence amendments**

Condition no.	Proposed amendments
Cover page	Registered address updated to IWS Group Asset Co Pty Ltd, 254 Hines and Wingfield Roads, Wingfield SA 5013.
Duration	Licence expiry date changed from 19 August 2036 to 15 August 2037 to align the expiry date of the licence with the annual fee period.
1 - Table 1: Landfill Cells	Landfill cell number removed from infrastructure location reference.
28	Removed reference to installing infrastructure listed in Table 8 within the corresponding timeframe.
28 – Table 8	Removed the timeframe column from the table.

Condition no.	Proposed amendments
28 – Table 8	Added construction of landfill cells 7, 8, 9, 10 and 11 to the table with the same design and construction requirements listed in Works Approval W6362/2020/1.
29	Timeframe for submission of compliance reporting changed from 28 days to 60 days to align closer to the timeframe listed in Works Approval W6362/2020/1. Compliance reporting name changed to Environmental Compliance Report.
30	New condition added listing the minimum requirements for Environmental Compliance Reports submitted for the landfill cells. The requirements are the same as those listed in Works Approval W6362/2020/1.
32	Dust management requirements during construction from Works Approval W6362/2020/1 were added.
Definitions	Definition for Environmental Compliance Report added.
Figure 1	Figure updated to current imagery.
Figure 2	Figure updated to most recent contour survey held on file.
Schedule 2	The premises boundary coordinates table was updated from GDA94 to GDA2020.

**Table 8: Consolidation of licence conditions in this amendment**

Existing condition	Condition summary	Revised licence condition	Conversion notes
1	Waste acceptance	2	Numbering revised.
2	Non-conforming waste	3	Numbering revised.
3	Supplier declaration	4	Numbering revised.
4	Damp loads	5	Numbering revised.
5	ACM risk classification	6	Numbering revised.
6	Unloading classified loads	7	Numbering revised.
7	Visual inspection for ACM	8	Numbering revised.
8	Records of ACM inspections	9	Numbering revised.
9	Waste processing	10	Numbering revised. Category column removed.
10	Stockpile management	11	Numbering revised.
11	Damp stockpiles	12	Numbering revised.
12	Landfill cover	13	Numbering revised.
13	Infrastructure and equipment	1	Numbering revised so that infrastructure and equipment is the first condition in the licence.
24	Annual Audit Compliance Report	26	Numbering revised and incorporated the previous change to reporting date from the Notice of amendment of licence reporting requirements.

Existing condition	Condition summary	Revised licence condition	Conversion notes
25	Annual Environmental Report	27	Numbering revised and incorporated the previous change to biennial reporting from the Notice of amendment of licence reporting requirements.
26	Accurate and auditable books	24	Numbering revised.
27		25	Numbering revised.
30	Commencement of operations after construction	31	Numbering revised.

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.