



Application for Licence Amendment

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

Licence Number	L8851/2014/1
Licence Holder	Shire of Irwin
File Number	DER2014/001889
Premises	Dongara Transfer Station Dee Street DONGARA WA 6525 Crown Reserve 26494 Being Lot 187 on Plan 208404 and Lot 300 on Plan 41494 as depicted in Schedule 1 of the licence
Date of Report	22 September 2020
Proposed Decision	Revised licence granted

Melissa Chamberlain

SENIOR ENVIRONMENTAL OFFICER

INDUSTRY REGULATION

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

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1. Decision summary

Licence L8851/2014/1 is held by the Shire of Irwin (licence holder) for the Dongara Transfer Station (the Premises), located at Crown Reserve 26494, Being Lot 187 on Plan 208404 and Lot 300 on Plan 41494, Dee Street, DONGARA, WA, 6525.

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 L8851/2014/1 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 and Amendment summary

On 12 May 2020, the Department initiated an amendment to licence L8851/2014/1 to incorporate the following changes:

- Correct an error to Reporting condition 17's AER due date from 1 August to 1 April.

On 28 July 2020, the licence holder submitted an application to the department to amend licence L8851/2014/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- The inclusion of a new Container Deposit Scheme (CDS) facility on the premises, involving the conversion of an existing shed to a container receipt and sorting area;
- Amendments to the annual Category 62 acceptance allowance (from 1000 tonnes per annual period to 2000 tonnes per annual year); and
- The authorisation to carry out an annual burn of excess unusable green waste.

In accordance with section 53 of the EP Act, alterations to a prescribed premises must be done so in accordance with a works approval, licence, closure notice or environmental protection notice. In accordance with DWER's *Industry Regulation Guide to Licensing* (June 2019), the Delegated Officer has determined that alterations to the premises to include CDS operations are appropriately facilitated via a licence amendment (which is the subject of this amendment report).

This amendment is limited only to changes to Category 62 activities from the Existing Licence. The authorisation of burning green waste on site has not been considered in this amendment as the licence holder also holds an active Category 89 registration for the premises (R1651/2004/1) which allows the burning of green waste in accordance with the *Environmental Protection (Rural Landfill) Regulations 2002*. No changes to the aspects of the existing Licence relating to Category 61 have been requested by the licence holder.

Table 1 below outlines the proposed changes to the existing licence design capacity

Table 1: Proposed design capacity changes

Category	Current design capacity	Proposed design capacity	Description of proposed amendment
62	1000 tonnes per annual period	2000 tonnes per annual period	2000 tonnes per annual period will include the existing input waste with the additional expected incoming waste from the CDS stream.

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 *Guidance Statement: Risk Assessments* (DER 2017).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 2: licence holder controls

Emission	Sources	Potential pathways	Proposed controls
Noise	Delivery and sorting of CDS stream	Air/windborne pathway	All sorting and deliveries occur within the shed
Leachate/residual liquids	Potential unclean containers	Seepage to soils and groundwater	Any unclean containers are diverted to the Meru waste facility for either disposal or comingle recycling. No unclean containers will be accepted. Only expected to store less than a tonne of waste on site at any one time.
Dust	Increased traffic flow	Air/windborne pathway	Cracker dust in front of CDS shed, gravel around rest of shed.
Noise	Increased traffic flow	Air/windborne pathway	N/A
Fire (smoke and firefighting washwaters)	Storage of CDS plastic	Air/windborne pathway (smoke) Seepage to soils and groundwater and overland flow (washwaters)	Fire extinguisher located at the gate and there are two located within the shed. The applicant is expecting WARRRL to remove waste off site weekly. Storage of waste onsite is expected to be less than a tonne at any time. Waste stored in 2200cm x 1160cm metal cages.
Contaminated Storm water	Washing down of shed	Seepage to soils and groundwater and overland flow	No washing down of shed is planned to occur due to only accepting clean containers. Only expected to store less than a tonne of waste on site at any one time.

3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), 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.

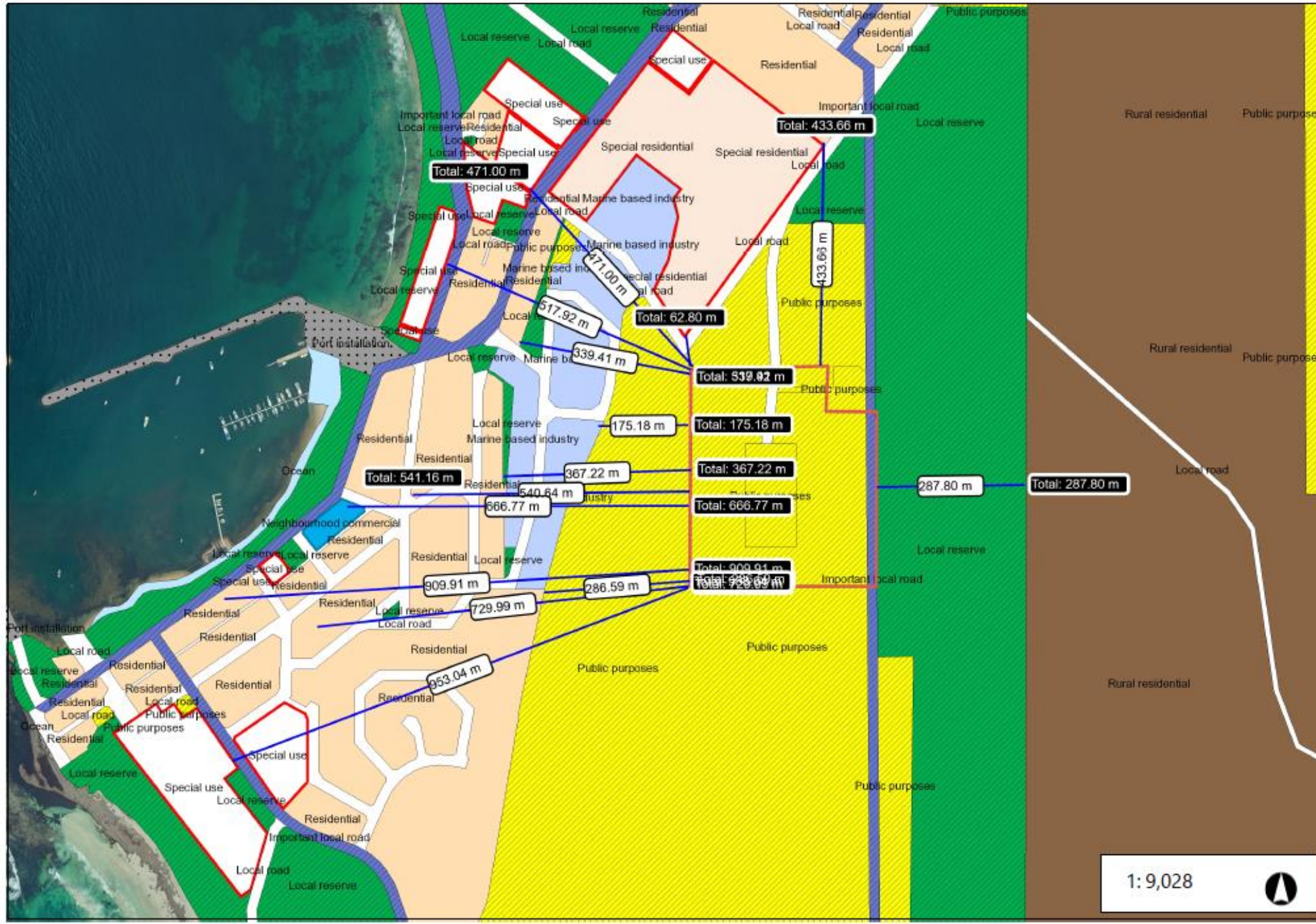
Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guidance Statement: Environmental Siting* (DER 2016)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Closest residential receptors	The premises boundary is: ~ 288m west of rural residential; ~ 287m, 367m, and 339m east of residential; and ~ 434m south of residential.
Marine based industry	~ 175 m west of the premises boundary
Holiday Units, Chalets and Holiday park	~ 541m, 730m, and 910m west of the premises boundary; ~ 953m south west of the premises boundary; and ~ 471m, and 518m north west of the premises boundary
Bar and Restaurant	~ 667m west of the premises boundary
Users of Dongara Golf Course	Shares the eastern boarder of the premises boundary
Environmental receptors	Distance from prescribed activity
TEC Buffer Zone – Subtropical and Temperate Coastal Saltmarsh – Priority 3	~ 793m north west of the premises boundary
RIWI Act 1914 – Groundwater Area	Within the Arrowsmith Groundwater Area



Dongara Transfer Station: Distance to sensitive receptors - Human



Legend

Local Planning Scheme - Zones and Reserves

- Aboriginal reserve
- Access road
- Aerial landing ground
- Agricultural industrial
- Agricultural resource
- Agriculture
- Agriculture - general
- Agriculture priority 1 - Scott Coastal Plain
- Agriculture priority 2
- Airport
- Arterial road
- Bushland protection
- Business
- Business - commercial
- Business development
- Canal
- Canal development
- Car park
- Caravan / chalet park
- Caravan and camping
- Caravan park
- Caravan park and camping ground
- Caravan, camping and cabin
- Central Geraldton
- Central area
- Central business

Notes

- ~63m south of Special Residential;
- ~288m west of Rural Residential;
- ~287m, 367m, and 339m east of Residential;
- and
- ~434m south of Residential.

Author:
Recipient:

1:9,028

0.6 0 0.32 0.6 Kilometers

WGS_1984_Web_Mercator_Auxiliary_Sphere
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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

Figure 1: Distance to sensitive receptors - human



Legend

19. Ecological Communities (Threatened Ecological Communities and Priority Ecological Communities)

- Critically Endangered
- Data Deficient
- De-list
- Endangered
- Lower Risk
- Not Evaluated
- Vulnerable
- Priority 1
- Priority 2
- Priority 3
- Priority 4

Notes

~793m south east of a P3 TEC Buffer Zone

Author:
Recipient:



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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
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Figure 2: Distance to sensitive receptors - environmental

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) 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 4.

The Revised Licence L8851/2014/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. acceptance and sorting of CDS waste stream, increase in vehicle movements associated with CDS drop off, and washing down of the CDS shed.

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 operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	licence holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	licence holder's controls				
Vehicle movements	Dust	Air/windborne pathway causing impacts to health and amenity	Residential receptors (see table 4) Golf course users directly to the east of the premises boundary Closest holiday accommodations (see table 4)	Cracker dust carpark Bitumen from entrance to the gate house Gravel surrounding the shed Vehicle movements not expected to increase much.	C = Slight L = Possible Low Risk	Y	N/A	N/A
	Noise			Vehicle movements not expected to increase much.				
Operation of the CDS collection and sorting shed	Noise		Doors open out to the east of the shed.	Sorting operations to occur within the shed	C = Slight L = Possible Low Risk	Y	Condition 4 Table 1 waste acceptance limits a combined total of all waste accepted onto site to 2,000 tpa Condition 6 Table 2 waste processing requires CDS materials be directed into the shed for sorting and temporary storage in cages prior to bailing or offsite removal.	N/A

Risk Event					Risk rating ¹	licence holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	licence holder's controls	C = consequence L = likelihood			
Operation of the CDS collection and sorting shed Washing down of the CDS shed, spills from unclean containers	Leachates or stormwater contaminated with leachates	Seepage or overland flow causing impacts to groundwater quality, soil contamination or ecosystem disturbances	RIWI Arrowsmith Groundwater Area Residential receptors (closest being ~63m north)	Sorting operations occur within the shed (sealed surface) Only accepting clean containers. Not expecting to wash down the shed.	C = Minor L = Rare Low Risk	Y	Condition 4 Table 1 Waste acceptance amended to require approved CDS materials to contain <5% unavoidable contaminants; and a combined total of all waste accepted onto site limited to 2,000 tpa.	N/A
Upset conditions (fire)	Firefighting washwaters	Seepage or overland flow causing impacts to groundwater quality, soil contamination or ecosystem disturbances	RIWI Arrowsmith Groundwater Area Residential receptors (closest being ~63m north)	No specified controls	C = Minor L = Unlikely Medium Risk	N	Condition 12 requires firefighting equipment to be maintained in good working order, unauthorised fires to be extinguished as soon as possible and firefighting water to be contained and collected.	The applicant did not provide specific controls related to managing firefighting washwaters. This condition outlines what is required in the event of a fire.
	Fire (smoke)	Air/windborne pathway causing impacts to health and amenity	Residential receptors (see table 4) Golf course users directly to the east of the premises boundary Closest holiday accommodations (see table 4)	Stored within the shed in cages	C = Minor L = Unlikely Medium Risk	Y	Condition 6 Table 2 Waste processing amended to require approved CDS materials stored in cages prior to bailing or offsite removal; Condition 4 Table 1 waste acceptance limits a combined total of all waste accepted onto site to 2,000 tpa..	N/A

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

Note 2: Proposed licence holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Licence holder was provided with draft amendment on 21 September 2020	<p>Requesting the inclusion of a reference to the Registration of Landfill onto the licence preamble.</p> <p>Removal of DWER initiated amendment to treatment ponds.</p> <p>Minor spelling and formatting errors</p>	<p>Licences no longer include preambles, however the Decision Report outlines that burning of green waste on site was not assessed as part of this amendment due to the presence of a Category 89 registration for the site which allows burning of green waste in accordance with the Rural Landfill Regulations.</p> <p>DWER initiated amendment to the treatment ponds has been removed as part of this amendment as it is outside the scope of the assessment for CDS acceptance. The proposed amendments will be addressed outside of this amendment.</p> <p>The minor spelling and formatting errors have been updated.</p>

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
Cover page	Prescribed premises category table amended to increase the assessed design capacity for Category 62 from 1,000 to 2,000 tonnes per annual period.
4	Table 1: Waste acceptance amended to include approved CDS materials with a new combined total of 2,000 tonnes per annual period for inert waste type 1, inert waste type 2, metals and white goods, hazardous waste, putrescible waste and approved CDS material.
6	Table 2: Waste processing amended to include waste processing for approved CDS materials.
12	New condition added to specify actions to be taken in the event of a fire in line with the risk assessment in Table 5.

18	The due date indicated for the submission of an AER has been corrected from 1 August to 1 April due to DWER initiated amendment.
Definitions	Addition of “approved CDS materials” and “suitably licenced premises”
Schedule 1: Maps	Premises map (Figure 1) has been updated to include the CDS Shed, Gatehouse and Main Entry.
Schedule 1: Maps	Site layout – CDS Shed (Figure 2) added to the licence.
Format	Format and numbering has been updated to the current licensing format.

References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.