



## Application for Licence Amendment

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

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<b>Licence Number</b>	L8871/2014/2
<b>Licence Holder</b>	Veolia Recycling and Recovery (Perth) Pty Ltd
<b>ACN</b>	118 828 872
<b>File Number</b>	DER2014/002858-1
<b>Premises</b>	North Bannister Resource Recovery Park 6264 Albany Highway NORTH BANNISTER WA 6390  Legal description - Lot 2 on Deposited Plan 2767
<b>Date of Report</b>	31 July 2024
<b>Decision</b>	Revised licence granted

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

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## 1. Decision summary

Licence L8871/2014/2 is held by Veolia Recycling and Recovery (Perth) Pty Ltd (Licence Holder) for the North Bannister Resource Recovery Park (the Premises), located at 6264 Albany Highway, North Bannister.

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 L8871/2014/2 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 Amendment summary

On 2 December 2021 the Licence Holder amended Licence L8871/2014/2 to enable acceptance of Food Organics and Garden Organics (FOGO) wastes and the operation of an interim FOGO facility.

On 25 August 2022 the Licence Holder had Works Approval W6668/2022/1 granted to allow construction works relating to an expansion of the FOGO processing facility at the premises, to include a screening plant. This infrastructure supports the increased acceptance of FOGO from 10,000 tonnes per annum up to 40,000 tonnes per annum.

On 20 December 2023, the Licence Holder submitted an application to the department to amend Licence L8871/2014/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act) to enable the operation of the new FOGO screening plant and the acceptance of the increased rate of FOGO. As part of this amendment the Licence Holder has also submitted the Environmental Compliance Report required in support of completion of the construction authorised under W6668/2022/1.

The following amendments are being sought:

- a change to the Licence Holder name, however ACN remains the same;
- update list of active groundwater monitoring bores;
- increase in FOGO acceptance to 40,000 tonnes per annum;
- reduction in freeboard in leachate pond 1;
- relocation of designated tyre stockpile area; and
- use of blended organics overburden as daily cover material.

The application does not propose to increase the category 67A production capacity on licence L8871/2014/2 from the current assessed capacity of 100, 000 tonnes per annum, rather it seeks to increase the quantity of FOGO able to be accepted.

This amendment does not change the existing assessed production and/or design capacities of the prescribed activities occurring at the Premises, as specified in Table 1 below.

**Table 1: Proposed production capacity changes**

Category	Approved design capacity	Proposed throughput capacity
Category 57 used tyre storage	1000 tyres	1000 tyres
Category 61 liquid waste facility	16,000 tonnes per annum	16,000 tonnes per annum
Category 61A solid waste facility	90,000 tonnes per annum	90,000 tonnes per annum
Category 62 solid waste depot	14,000 tonnes per annum	14,000 tonnes per annum
Category 64 Class II or III putrescible landfill	400,000 tonnes per annum	400,000 tonnes per annum
Category 67A compost manufacturing and soil blending	100,000 tonnes per annum Inclusive of 10,000 tonnes per annum FOGO	100,000 tonnes per annum Inclusive of 40,000 tonnes per annum FOGO

### 2.2.1 Licence Holder's request to alter daily cover material

The application provided information supporting the request to use organics overburden as daily cover material by blending it in a 1:1 ratio with either soil or other non-combustible inert waste type 1 materials.

Overburden from the composting process is materials that have not composted and are screened out from the final product, which generally includes large pieces of green waste, plastics, glass and other contaminants. The overburden is a putrescible waste and is also coated with putrescible compost.

The purpose of daily cover is to minimise emissions of odour, leachate, unauthorised fires, contaminated stormwater, windblown wastes and vermin infestation from putrescible wastes, inert waste type 2, special waste type 1 and special waste type 2. Given the overburden contains putrescible wastes and large pieces of green waste it is unsuitable as a daily cover, regardless of blending in a 1:1 ratio, as the wastes will continue to decompose thereby losing integrity as a cover material.

The department met with the Licence Holder to discuss the proposed use of blended organics overburden as daily cover material and the risks this poses. As a result, the Licence Holder advised on 2 May 2024 that they wish to withdraw this portion of the licence amendment.

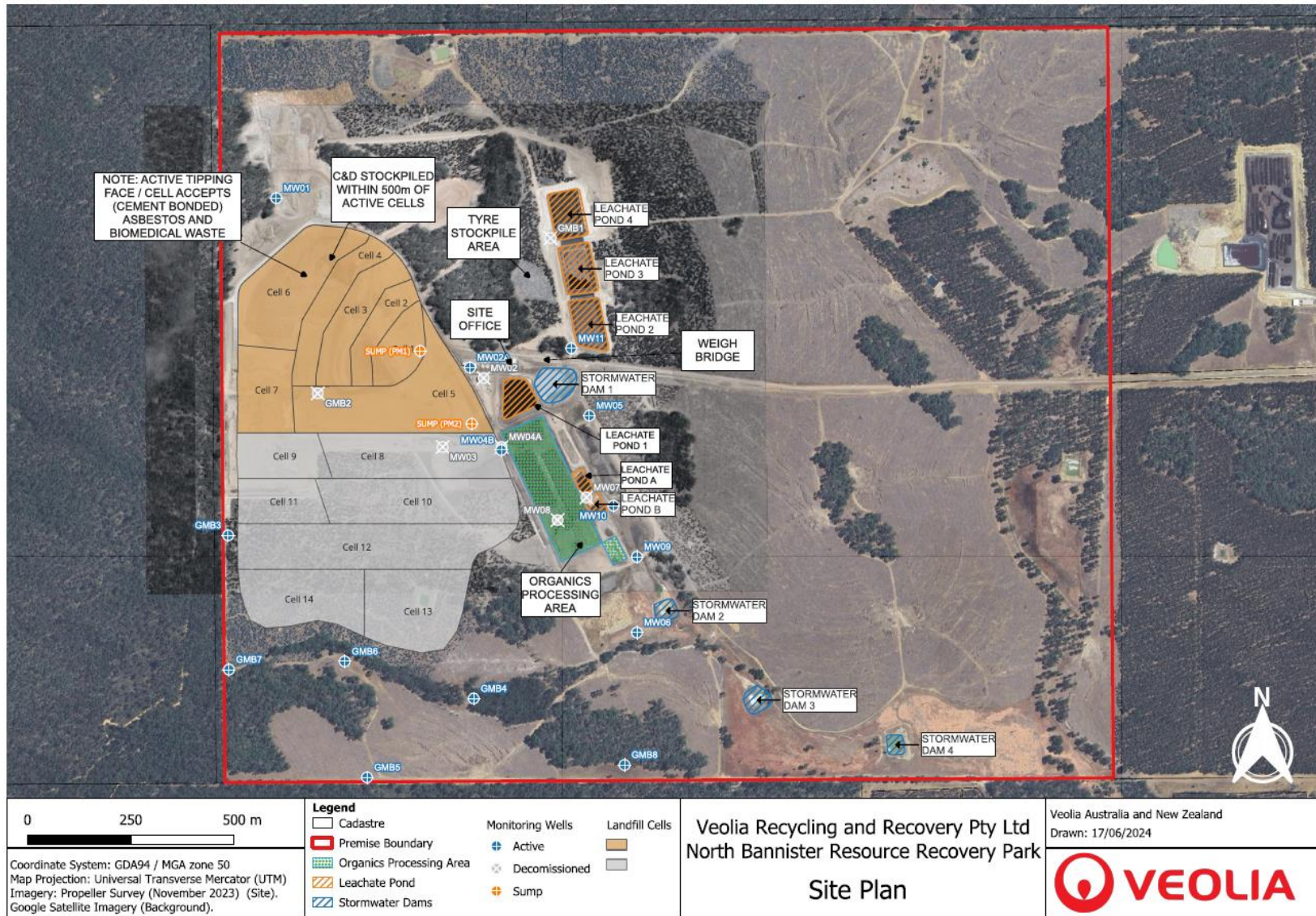


Figure 1: Premises current infrastructure, storage areas, monitoring bores and future landfill cells

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### 3. Water balance modelling

The freeboard limit of 1100 mm for Pond 1 was determined from water balance modelling when Pond 1 was the sole leachate pond for the original landfill cells.

With the subsequent development of additional landfill cells up to cell 5, leachate ponds 2, 3 and 4 were constructed. In the planning for Phase 1 of the landfill, consisting of cells 1 to 8, water balance modelling was conducted to determine the appropriate size for the leachate ponds and associated freeboards for the system. As leachate ponds 2, 3 and 4 are now online, there is sufficient combined freeboard across the four integrated ponds for contingency events to support the reduction of the operational freeboard of Pond 1 to 500 mm.

The automated leachate management system monitors leachate levels in all the ponds and alarms are triggered when the level reaches the licensed limits. Up to 100 m<sup>3</sup>/hr leachate can be pumped between any of the existing ponds. An overview of the leachate ponds and their capacity is provided in Table 2 below. A reduction of freeboard in Pond 1 from 1100 mm to 500 mm equates to approximately 3,300 m<sup>3</sup> in additional leachate storage capacity.

**Table 2: Leachate storage capacity across the pond system**

Pond	Max Storage Capacity (excluding freeboard)	Max Storage Capacity (including freeboard)	Freeboard Capacity
Pond 1	9,850 m <sup>3</sup> (current) 13,150 m <sup>3</sup> (proposed)	14,560 m <sup>3</sup>	4,710 m <sup>3</sup> (current) 1,410 m <sup>3</sup> (proposed)
Pond 2	10,912 m <sup>3</sup>	14,568 m <sup>3</sup>	3,656 m <sup>3</sup>
Pond 3	14,724 m <sup>3</sup>	18,383 m <sup>3</sup>	3,659 m <sup>3</sup>
Pond 4	21,226 m <sup>3</sup>	25,298 m <sup>3</sup>	4,072 m <sup>3</sup>
Pond 5 (future)	41,600 m <sup>3</sup>	47,800 m <sup>3</sup>	6,200 m <sup>3</sup>

### 4. 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.

#### 4.1 Source-pathways and receptors

##### 4.1.1 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 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**

Sources	Emission	Potential pathways	Proposed controls
Relocation of tyre storage area	Unauthorised tyre fires – smoke and fire spread	Air/windborne pathway	<p>Tyres to be stored within skip bins with sealed bases.</p> <p>Skip bins to be covered with tarpaulins.</p>
	Contaminated firefighting water and/or stormwater from the tyre storage area	<p>Direct discharge to land</p> <p>Subsurface seepage</p>	<p>Skip bins to be stored within a previously cleared area.</p> <p>Shire approved Bushfire Management Plan to manage bushfire impact.</p> <p>Appropriate site security to reduce the likelihood of vandals entering the site.</p> <p>Equipment already in place at the premises:</p> <ul style="list-style-type: none"> <li>• 150 kL firefighting water tank, fire hydrant filling point, pumps and hoses permanently on site fed by groundwater supply;</li> <li>• Large volume water cart that can be used for firefighting; and</li> <li>• Appropriate firefighting equipment on site and adequate training for site operating staff.</li> </ul>
Reduction in freeboard of Leachate Pond 1	Overtopping of ponds with treated and untreated wastewater	<p>Direct discharge to land</p> <p>Subsurface seepage</p>	<p>Leachate ponds 2, 3 and 4 are constructed and integrated into the leachate system, providing sufficient combined freeboard for contingency events to support the reduction of the operational freeboard of Pond 1 to 500 mm.</p>
Increased FOGO acceptance to current composting activities	Dust	Air / windborne pathway	<p>HEPA filtration system installed in the prefabricated picking station.</p>
	Noise	Air / windborne pathway	<p>The site normally operates between the hours of 5.00 am and 5.00 pm weekdays and between 5.00 am and 1.00 pm on Saturdays; consequently, there will be a two-hour period in the mornings when activities occur within the restricted noise period of the EP (Noise) Regs.</p> <p>Staff conduct noise monitoring to identify sources of excessive noise emissions and take actions to minimise noise. Ongoing problematic noise issues will be assessed by a specialist with recommendations for solutions.</p>
	Windblown wastes	Air / windborne pathway	<p>FOGO transported in vehicles that are covered and sealed.</p> <p>FOGO coarse fraction material is manually sorted within an enclosed building to remove non-organics, then stored within bins prior to disposal at the landfill onsite.</p> <p>2.4 m high cyclone fence around premises.</p>

Sources	Emission	Potential pathways	Proposed controls
Increased FOGO acceptance to current composting activities	Odour	Air / windborne pathway	<p>FOGO transported in vehicles that are covered and sealed.</p> <p>FOGO material is sorted for a short time within an enclosed building with a HEPA filter in the receival area before being blended with green waste and other organic materials.</p> <p>The FOGO sorting process operates at 20 tonnes per hour, ensuring incoming loads are swiftly moved through to blending and composting.</p> <p>During the 3-4 week composting pasteurisation period, air circulation is achieved via the mobile floor aeration system. If an increased level of odour is observed, the mobile floor aeration system used during pasteurisation will also be used in the initial composting stage for a further three to four weeks to reduce odours.</p>
	Vectors	Air / windborne pathway	<p>FOGO transported in vehicles that are covered and sealed.</p> <p>FOGO fine fraction material is screened upon receival through a trommel and taken to the composting step of the process for blended with green waste and other organic materials.</p> <p>The composting process requires the blending FOGO with green waste and other organic materials, preventing pooling of liquid wastes, maintaining the temperature of the compost between 60 °C and 70 °C, aeration and pasteurisation.</p>
	Leachate	<p>Direct discharge to land</p> <p>Subsurface seepage</p>	<p>FOGO transported in vehicles that are sealed and leakproof.</p> <p>All FOGO receival and sorting equipment is located upon a sealed, concrete hardstand area that connects to lined leachate ponds A and B via a concrete spoon drain to direct leachate into the ponds.</p> <p>Partially undercover storage and handling area limiting leachate potential through stormwater contact with FOGO.</p>
	Product quality	Discharge of contaminants to land through application of contaminated products.	<p>The incoming FOGO material is received at the decontamination building to manually remove non-organic contaminants.</p> <p>It is not proposed to change the overall method of operation of the composting process. Trials will be undertaken to assess the impact of increased FOGO material on product quality. If required, the mobile floor aeration system used during pasteurisation will</p>



Sources	Emission	Potential pathways	Proposed controls
			<p>also be used in the initial composting stage for a further three to four weeks to improve product quality.</p> <p>Compost product to be tested to ensure compliance with AS 4454-2012 and Biosolids Guidelines.</p>
Increased FOGO acceptance to current composting activities	Compost fires – smoke and fire spread	Air/windborne pathway	<p>Regular visual inspection of windrows to identify smouldering areas or smoke;</p> <p>Significant volumes of air blown through the forced aeration windrows to maintain the windrow temperature between 55-65° Celsius;</p> <p>Windrow moisture content maintained between 50% and 60% and finished product stockpile at nominal 30%;</p> <p>Windrows turned regularly to aerate the windrow material and reduce the heat build-up;</p> <p>Temperature monitoring of the windrowed material three times a week;</p> <p>Adequate vehicle access to individual material windrows for firefighting purposes;</p> <p>Mobile equipment and staff available to rapidly move material away from the area of ignition;</p> <p>Composting hardstands well away from surrounding bushland and plantations;</p> <p>Shire approved Bushfire Management Plan to manage bushfire impact;</p> <p>150 kL firefighting water tank, fire hydrant filling point, pumps and hoses permanently on site fed by groundwater supply;</p> <p>Large volume water cart that can be used for firefighting;</p> <p>Appropriate firefighting equipment on site and adequate training for site operating staff; and</p> <p>Appropriate site security to reduce the likelihood of vandals entering the site.</p>
	Contaminated firefighting water and/or stormwater from the composting area	<p>Direct discharge to land</p> <p>Subsurface seepage</p>	<p>Partially undercover storage and handling area to limit stormwater contact with FOGO.</p> <p>Firewater for suppressing fires within the compost will be sourced from leachate ponds A and B, or groundwater as backup, with the contaminated firewater and contaminated stormwater subsequently being directed back into leachate ponds A and B via the concrete spoon drain.</p>

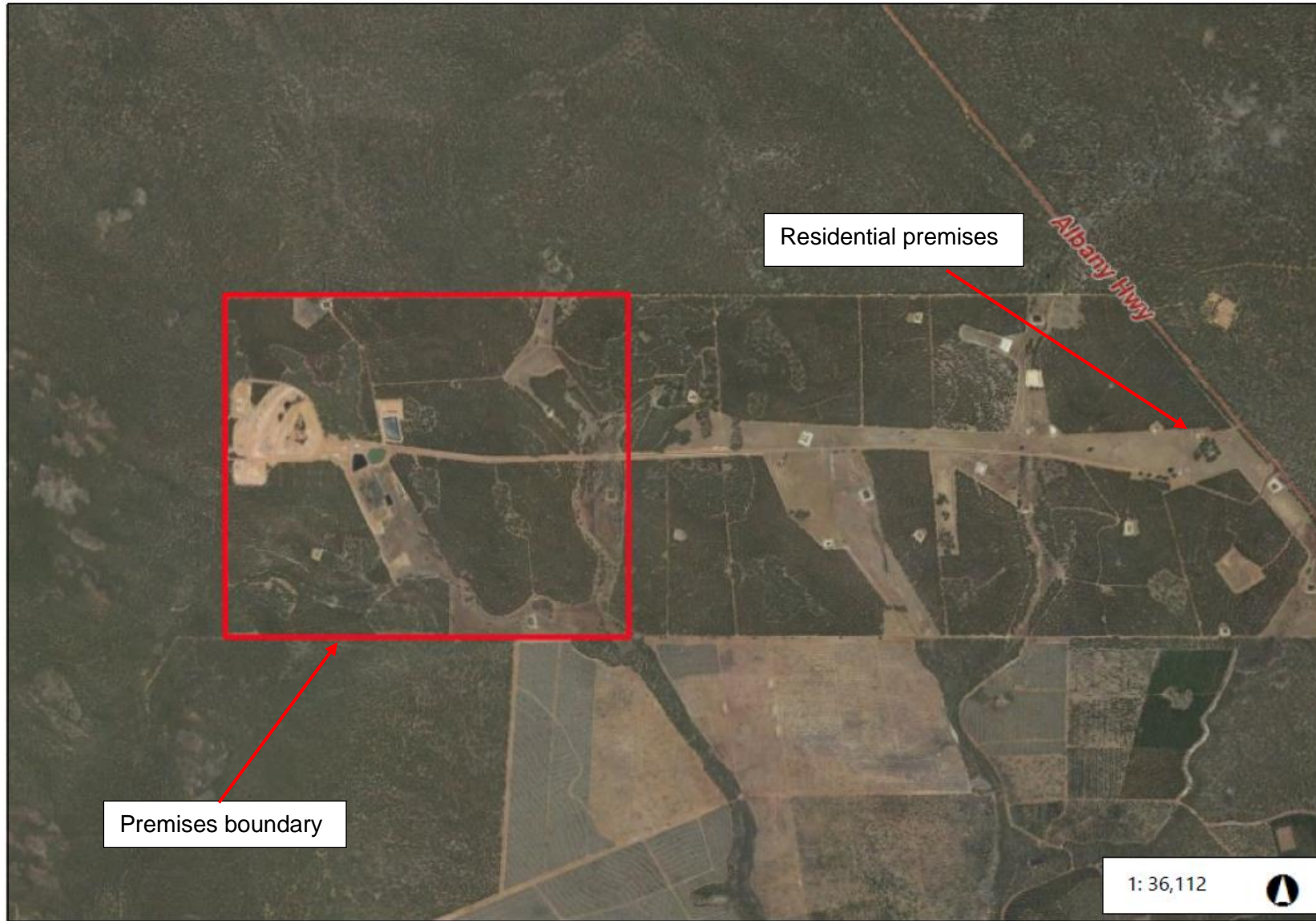
### 4.1.2 Receptors

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**

Human receptors	Distance from prescribed activity
Residential premises	3 km east of the premises boundary
Environmental receptors	Distance from prescribed activity
Serpentine Dam Catchment Area - Priority 2 Public Drinking Water Source Area	Within premises boundary. Note: Landfill footprint is situated outside the Serpentine Dam Catchment Area.
Serpentine Dam Catchment Area – Priority 1 Public Drinking Water Source Area	Directly adjacent to northern premises boundary.
Bannister River	Within premises boundary. Non-perennial watercourse flowing south-east through the premises. Constructed dams have been established along its course to hold water onsite. Flows to the Murray River, which discharges to Peel-Harvey Estuary.
Serpentine River	Non-perennial tributary located adjacent to northern premises boundary. A constructed dam has been built to retain surface water onsite. Premises is situated outside catchment area.  Main river channel is located 3.4km north-west of the premises boundary. Ultimately discharges to Peel-Harvey Estuary via the Serpentine River.
Dwellingup State Forrest	Directly adjacent to the northern and western premises boundaries.
Beelaring Class C Nature Reserve	Directly adjacent to the northern and western premises boundaries.
Threatened fauna	Scattered records as close as 700m east-northeast of premises boundary.
Gringer Creek	Minor river, tributary to Bannister River.  Approximately 6km to the south-east of the premises boundary.  Flows to the Bannister Rive, which ultimately discharges to the Peel-Harvey Estuary via the Murray River.
Groundwater	Premises is situated atop groundwater resource area – Karri, Karri, Combined – Fractured Rock West - Alluvium  The depth to groundwater varies across the site ranging from 1.5 to 20.5 meters below ground level (mbgl) (319 to 345 mAHD).  Well and borehole drilling indicates the presence of an unsaturated zone between the landfill liner and groundwater.



**Figure 2: Distance to sensitive receptors**

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## 4.2 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 4.1. 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 4.1), 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 L8871/2014/2 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

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

Table 5. Risk assessment of potential emissions and discharges from the Premises during operation

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	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				
<b>Operation</b>								
Relocation of tyre storage area	Unauthorised tyre fires – smoke and fire spread	Air/windborne pathway. Causing impacts to health and amenity and protected vegetation areas.	Residential premises State forest and nature reserve	Refer to Section 4.1	C = Severe L = Unlikely <b>High Risk</b>	Yes	Conditions 1, 2, 3, 4, 5, 6, 12, 18, 19, 27, 28, 31, 34, 35. <b>Condition 7</b>	The Delegated Officer considers the controls proposed by the Licence Holder are sufficient to prevent unauthorised tyre fires occurring in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions of the Licence. The Delegated Officer has included additional conditions regarding separation distances of skip bins from each other and from infrastructure and vegetated areas, plus maintaining the area as free of emergent vegetation to prevent the spread of tyre fires.
Relocation of tyre storage area	Contaminated firefighting water and/or stormwater from the tyre storage area	Direct discharge to land, subsurface seepage. Impacts to surface and groundwater sources.	Adjacent P1 & P2 PDWSA Surrounding river systems	Refer to Section 4.1	C = Major L = Unlikely <b>High Risk</b>	Yes	Conditions 1, 2, 6, 5, 7, 34, 35. <b>Condition 5</b>	The Delegated Officer considers the controls proposed by the Licence Holder are sufficient to prevent emissions of contaminated firefighting water and stormwater from suppression of tyre fires in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions of the Licence. The Delegated Officer has included an additional condition for the disposal of contaminated firewater to an appropriately licensed landfill.
Reduction in freeboard of Leachate Pond 1	Overtopping of ponds with treated and untreated wastewater	Direct discharge to land, subsurface seepage. Impacts to surface and groundwater sources.	Adjacent P1 & P2 PDWSA Surrounding river systems	Refer to Section 4.1	C = Major L = Unlikely <b>Medium Risk</b>	Yes	Conditions 6, 7, 14, 15, 16, 22, 23, 24, 25, 26, 31, 32, 33, 34, 35.	The Delegated Officer considers the combined freeboard of all 4 ponds sufficient to prevent overtopping of the leachate ponds in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational and maintenance conditions of the Licence.
Increased FOGO acceptance to current composting activities	Dust	Air / windborne pathway. Impacts to amenity.	Residential premises	Refer to Section 4.1	C = Minor L = Unlikely <b>Medium Risk</b>	Yes	Conditions 1, 2, 5, 6, 7, 28, 34, 35.	The Delegated Officer considers existing licence conditions and Licence Holder controls are sufficient to prevent dust emissions in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via maintenance conditions of the Licence.

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	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				
	Noise	Air / windborne pathway. Impacts to amenity.	Residential premises	Refer to Section 4.1	C = Minor L = Unlikely <b>Medium Risk</b>	Yes	Conditions 28, 34, 35.	The Delegated Officer considers existing licence conditions and Licence Holder controls are sufficient to mitigate noise emissions in most circumstances.  The Delegated Officer considers no additional conditions are required on the Licence.
Increased FOGO acceptance to current composting activities	Windblown wastes	Air / windborne pathway. Impacts to amenity.	Residential premises State forest and nature reserve	Refer to Section 4.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Yes	Conditions 12, 13.	The Delegated Officer considers existing licence conditions and Licence Holder controls are sufficient to mitigate windblown wastes in most circumstances.  The Delegated Officer considers no additional conditions are required on the Licence.
	Odour	Air / windborne pathway. Impacts to amenity.	Residential premises	Refer to Section 4.1	C = Minor L = Unlikely <b>Medium Risk</b>	Yes	Conditions 1, 2, 5, 6, 7, 28, 34, 35.	The Delegated Officer considers existing licence conditions and Licence Holder controls are sufficient to prevent odour emissions in most circumstances.  The Delegated Officer considers no additional conditions are required on the Licence.
	Vectors	Air / windborne pathway. Impacts to amenity.	Public health and amenity	Refer to Section 4.1	C = Major L = Unlikely <b>Medium Risk</b>	Yes	Conditions 1, 2, 5.	The Delegated Officer considers existing licence conditions and Licence Holder controls are sufficient to mitigate vectors in most circumstances.  The Delegated Officer considers no additional conditions are required on the Licence.
	Leachate	Direct discharge to land, subsurface seepage. Impacts to surface and groundwater sources.	P1 & P2 PDWSA Surrounding river systems	Refer to Section 4.1	C = Major L = Unlikely <b>Medium Risk</b>	Yes	Conditions 6, 7, 14, 15, 16, 18, 19, 22, 23, 24, 25, 26, 27, 31, 32, 33, 34, 35. <b>Condition 7</b>	The Delegated Officer considers construction performed under W6668/2022/1 plus the existing leachate pond system incorporating the requested freeboard reduction of Pond 1 to 500 mm sufficient to support the increase in FOGO waste acceptance and to prevent discharges and seepage of leachate in most circumstances.  As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational and maintenance conditions of the Licence.  The Delegated Officer has modified condition 7 so the asphalt and concrete hardstand areas and the drainage system are maintained as free of leaks and defects.

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	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				
	Product quality	Direct discharge of contaminants to land through application of contaminated products. Impacts to public health and amenity.	Any receiving environment of the composted product	Refer to Section 4.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Yes	Conditions 1, 2, 5, 6, 19, 20, 21, 27, 28, 31, 34, 35.	The Delegated Officer considers existing licence conditions and Licence Holder controls are sufficient to ensure consistent product quality and prevent discharges of contaminants in most circumstances.  The Delegated Officer considers no additional conditions are required on the Licence.
	Compost fires – smoke and fire spread	Air/windborne pathway. Impacts to health and amenity and protected vegetation areas.	Residential premises State forest and nature reserve	Refer to Section 4.1	C = Severe L = Unlikely <b>High Risk</b>	Yes	Conditions 3, 4, 6, 7, 28, 34, 35.	The Delegated Officer considers the controls proposed by the Licence Holder are sufficient to prevent compost fires occurring in most circumstances.  As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational and maintenance conditions of the Licence.
Increased FOGO acceptance to current composting activities	Contaminated firefighting water and/or stormwater from the composting area	Direct discharge to land, subsurface seepage. Impacts to surface and groundwater sources.	Adjacent P1 & P2 PDWSA Surrounding river systems	Refer to Section 4.1	C = Severe L = Unlikely <b>High Risk</b>	Yes	Conditions 6, 7, 14, 15, 16, 22, 23, 24, 25, 26, 31, 32, 33, 34, 35.	The Delegated Officer considers the controls proposed by the Licence Holder are sufficient to prevent emissions of contaminated firefighting water and stormwater from suppression of compost/feedstock fires in most circumstances.  As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational and maintenance conditions of the Licence.

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.

## 5. Assessment of Licence Holder's request to amend conditions

The licence requires ongoing monitoring of various parameters in groundwater from the bore network that surrounds the premises, to identify contamination of groundwater indicative of subsurface seepage from the landfill and treatment ponds. In accordance with works completed under previous licence amendments for the construction of Cells 5 and 6, Leachate Ponds 3 and 4 and the expansion of the compost area, groundwater monitoring bores GMB1, GMB2, MW03, MW07 and MW08 have been decommissioned. The Licence Holder therefore requests these are removed from licence condition 30.

Replacement groundwater monitoring bores MW09, MW10 and MW11 have been constructed and are already included in the current licence for monitoring requirements.

Table 6 below provides an overview of the decommissioned bores as part of recent works and expansions at the premises.

**Table 6: Decommissioned groundwater monitoring bores**

Monitoring point reference and location	Corresponding works specification	Infrastructure/equipment details
GMB1	Works Specifications – Construction of Leachate Ponds 3 and 4	GMB1 was decommissioned in accordance with Section 18 of the National Water Commission's Guidelines 1. Replacement monitoring well MW11 have been installed and are already specified in condition 24 (was condition 30).
GMB2 and MW03	Works Specifications – Construction of Cells 5 and 6	GMB2 and MW03 were decommissioned in accordance with Section 18 of the National Water Commission's Guidelines 1.
MW07 and MW08	Works specifications – Compost area expansion	MW07 and MW08 were decommissioned in accordance with Section 18 of the National Water Commission's Guidelines 1. Replacement monitoring wells MW9 and MW10 have been installed and are already specified in condition 24 (was condition 30).

The Delegated Officer considers licence conditions relating to groundwater monitoring bores GMB1, GMB2, MW03, MW07 and MW08 are redundant with their decommissioning. These monitoring bores will be deleted from condition 24. The associated design and construction requirements for decommissioning and installation of groundwater monitoring wells within Schedules 5, 6 and 7 are redundant with the submission of the Construction Quality Assurance Validation Report lodged in accordance with condition 9. As such, these schedules will be deleted.



## 6. Department initiated amendment for the removal of high risk clinical waste acceptance

As there is no medical waste incineration facility established in Western Australia, clinical waste management operators rely on rail transport to move high-risk category clinical waste generated from public and private medical facilities to incineration facilities located in the eastern states. Flooding events in southern areas of Western Australia during January 2022 caused significant damage to the Trans-Australian Railway and haulage roads between Western Australia and South Australia. This prevented all interstate rail movements and restricted truck movement between Western Australia and South Australia.

While the Licence Holder already had approval for the acceptance of Special Waste Type 2, biomedical wastes, the Licence Holder requested to temporarily dispose of high-risk category clinical waste by deep burial until the rail line was operational and the waste could be accepted for incineration in South Australia, in accordance with the "Code of Practice for Clinical and Related Waste Management, Public Health Act 2016." It was estimated that 80 to 100 tonnes of waste required an immediate management solution over a four week period.

On 17 February 2022, the department granted an amendment to Licence L8871/2014/1 to allow for the short term acceptance of high-risk clinical waste at the North Bannister Resource Recovery Park from 4 February 2022 to 7 March 2022. No changes to throughput or categories were included with the amendment.

The Trans-Australian Railway and haulage roads between Western Australia and South Australia have since been repaired and are in full operation. As the timeframe for the short term acceptance of high-risk clinical waste has passed, the department has taken this opportunity to remove the licence conditions relating to high-risk clinical waste acceptance and disposal as they are now redundant.

Conditions relating to the acceptance and disposal of standard Special Waste Type 2 biomedical wastes will be retained, as was the practice prior to the 2022 amendment.

## 7. Consultation

Table 7 provides a summary of the consultation undertaken by the department.

**Table 7: Consultation**

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment (20/06/2024)	The Licence Holder has concerns about the feasibility of retrofitting lids onto the proposed skip bins. To address water ingress the licence holder proposed to use tarps to cover the skip bins with support poles that will prevent water pooling, and facilitate proper drainage and runoff, mitigating the risk of tarp failure due to excess water pooling.	The Delegated Officer notes the Licence Holder's proposed alternative bin cover and has modified the Licence Holder proposed controls listed in Table 3 of the Amendment Report.  The Delegated Officer has reassessed the use of skip bins with tarpaulin covers, as an alternative to lids on the bins, in the risk assessment within Table 5 of the Amendment Report.  Subsequently, amendments have been made in the licence to condition 5, Table 3 and to condition 7, Table 5.

## 8. 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.

Licence: [L8871/2014/2](#)

## 8.1 Summary of amendments

Table 8 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

**Table 8: Summary of licence amendments**

Condition no.	Previous condition no.	Proposed amendments
N/A	N/A	Alteration to the Licence Holder name to be Veolia Recycling and Recovery (Perth) Pty Ltd as requested by the Licence Holder. As the ACN is not changing, this portion of the amendment to the licence is administrative in nature.
Condition 1 Table 1 Table 2	Condition 1 Table 1 Table 2	<p>The Quantity Limit per annual period in Table 1 for the portion of Category 67A waste acceptance relevant to FOGO wastes has been amended to 40,000 tonnes per annual period.</p> <p>The Acceptance Specification requirement in Table 1 for Category 67A waste to contain no more than 10% non-organic content has become redundant with the use of the FOGO decontamination facility and picking station. As such, this requirement has been deleted.</p> <p>The Acceptance Specification time frame for high-risk clinical waste for Special Waste Type 2 has passed, making the relevant conditions redundant. As such, specification (i) has been deleted from Table 1.</p> <p>Update in Table 2 to table number referenced in the row for 'Industrial wash waters contaminated with a controlled waste' to correct the typo error, to read Table 2.</p>
Condition 2	Condition 2	Condition retained
Condition 3	Condition 3	Condition retained
Condition 4	Condition 4	Condition retained
N/A	Condition 5 Table 3	The Licence Holder has satisfied the requirements of the works specifications of condition 5, Table 3 with the submission of the Construction Quality Assurance Validation Reports lodged in accordance with condition 9. As such, this condition has been deleted.
N/A	Condition 6	Condition 6 becomes redundant with the deletion of condition 5, Table 3. As such, this condition has been deleted.
N/A	Condition 7	Condition 7 becomes redundant with the deletion of condition 6. As such, this condition has been deleted.
N/A	Condition 8	Condition 8 becomes redundant with the deletion of condition 9. As such, this condition has been deleted.
N/A	Condition 9	<p>The Licence Holder has satisfied the requirements of condition 9 with the submission of the Construction Quality Assurance Validation Reports as follows:</p> <ul style="list-style-type: none"> <li>Row 1 Leachate Pond 2 CQA lodged with Leachate Pond B CQA.</li> <li>Row 2 Leachate Pond B and groundwater monitoring bores CQA lodged on 6 June 2019.</li> </ul>

Condition no.	Previous condition no.	Proposed amendments
		<ul style="list-style-type: none"> <li>• Row 3 Cell 5 CQA lodged on 31 October 2019.</li> <li>• Row 3 Cell 6 CQA lodged on 13 April 2023.</li> <li>• Row 4 Leachate Pond 3 CQA lodged on 4 August 2022.</li> <li>• Row 4 Leachate Pond 4 CQA report lodged on 29 December 2022.</li> </ul> <p>As such, this condition is redundant so has been deleted.</p>
N/A	Condition 10	Condition 10 becomes redundant with the deletion of conditions 8 and 9. As such, this condition has been deleted.
Condition 5 Table 3 Table 4	Condition 11 Table 4 Table 5	<p>Update to table numbers referenced within Condition 5 to reflect the renumbered tables.</p> <p>Update to table, figure and condition numbers referenced within the process limits or specifications of Table 3 and Table 4.</p> <p>Modification of process specifications within Table 3 for Inert Waste Type 1, Special Waste Type 1 and Special Waste Type 2 to clarify the storage location and include recording GPS points, consistent with current practices and the updated premises map.</p> <p>Process specifications for Special Waste Type 1 high-risk clinical waste becomes redundant with the deletion of this waste from condition 1 Table 1. As such, the process limit/specification for high-risk clinical waste has been deleted from Table 3.</p> <p>Modification and addition of process specifications within Table 3 for tyres and disposal of firefighting water from tyre fires.</p> <p>Renaming of the green waste storage area to Organics Processing Area for solid green waste, food processing waste and FOGO, consistent with the updated premises map.</p> <p>Addition of process specifications for disposal of firefighting water from compost fires for green waste, food processing waste and FOGO waste.</p> <p>Modification of process specification within Table 3 for acid sulphate soils to clarify the disposal location, consistent with the updated premises map.</p>
Condition 6	Condition 19	Condition retained and renumbered.  Update to table numbers referenced within Condition 6 to reflect the renumbered tables.
Condition 7 Table 5	Condition 20 Table 10	Condition retained and renumbered.  Update to table number referenced within Condition 7 to reflect the renumbered tables.  Update to figure numbers referenced within Table 5 to reflect the renumbered figures.  Renaming of the green waste storage area to Organics Processing Area and addition of FOGO decontamination plant and HEPA filtration system. Modification of asphalt and concrete areas and the drainage system to be maintained as free of leaks and defects.  Renaming of the green waste storage area to Organics Processing Area in the liquid waste storage requirements.

Condition no.	Previous condition no.	Proposed amendments
		<p>Renaming of the green waste storage area to Organics Processing Area in the waste material column for Leachate Ponds A and B.</p> <p>Modification of the freeboard maintenance requirement for Leachate Pond 1 to be 500 mm, as requested by the Licence Holder.</p> <p>Emergency runoff from the tyre stockpile area deleted from draining into Leachate Pond A and B, as this is replaced with disposal of contaminated firefighting water requirements in Condition 5 Table 3.</p> <p>Addition of infrastructure requirements within Table 5 for tyres, to include maintenance of skip bins, prevent vegetation within the storage area and provide separation distances.</p>
Condition 8	Condition 21	Condition retained and renumbered.
Condition 9 Table 6	Condition 22 Table 11	<p>Condition retained and renumbered.</p> <p>Update to table numbers referenced within Condition 7 to reflect the renumbered tables.</p>
Condition 10	Condition 12	Condition retained and renumbered.
Condition 11 Table 7	Condition 13 Table 6	<p>Condition retained and renumbered.</p> <p>Update to table number referenced within Condition 11 to reflect the renumbered tables.</p> <p>Cover requirements for Special Waste Type 1 high-risk clinical waste becomes redundant with the deletion of this waste from condition 1 Table 1. As such, cover requirements for high-risk clinical wastes have been deleted from Table 7.</p>
Condition 12	Condition 14	The Licence Holder has satisfied the requirements of works approval W6668/2022/1 which included construction of a perimeter fence. Condition 14 (a) has been amended to remove reference to 'erect' a fence as this is now redundant. The remaining condition 14 (a) to maintain the fence has been retained on the licence.
Condition 13	Condition 15	Condition retained and renumbered.
Condition 14 Table 8	Condition 16 Table 7	<p>Condition retained and renumbered.</p> <p>Update to table number referenced within Condition 14 to reflect the renumbered tables.</p> <p>Update to condition and Table numbers referenced within Table 8 to reflect the renumbered tables.</p> <p>Operational levels within Table 8 have been deleted as they are adequately regulated by condition 15.</p>
Condition 15 Table 9	Condition 17 Table 8	<p>Condition retained and renumbered.</p> <p>Update to table number referenced within Condition 15 to reflect the renumbered tables.</p> <p>Reference to Figure S3-3 edited to correct the typo error and updated to reflect the renumbered figures.</p> <p>Modification of the freeboard requirement for Leachate Pond 1 to be 500 mm, as requested by the Licence Holder.</p>

Condition no.	Previous condition no.	Proposed amendments
		Addition of the operational level for the Stormwater Dam 1, as specified in Condition 7, to ensure the intended cross referencing from condition 14, Table 8 is accurate.
Condition 16 Table 10	Condition 18 Table 7	Condition retained and renumbered. Update to table number referenced within Condition 16 to reflect the renumbered table. Addition of 'Reportable Event' to provide clarity and linkage to notification requirements under conditions 32 and 33. Update to condition numbers referenced within Table 10.
Condition 17 Table 11	Condition 23 Table 12	Condition retained and renumbered. Update to table number referenced within Condition 17 to reflect the renumbered tables.
Condition 18	Condition 24	Condition retained and renumbered.
Condition 19 Table 12	Condition 25 Table 13	Condition retained and renumbered. Update to table number referenced within Condition 19 to reflect the renumbered tables. Monitoring of waste inputs for Special Waste Type 1 high-risk clinical waste becomes redundant with the deletion of this waste from condition 1 Table 1. As such, monitoring of Special Waste Type 2 (high-risk clinical waste) has been deleted from Table 12.
Condition 20	Condition 26	Condition retained and renumbered.
Condition 21	Condition 27	Condition retained and renumbered.
Condition 22	Condition 28	Condition retained and renumbered.
Condition 23 Table 13	Condition 29 Table 14	Condition retained and renumbered. Update to table number referenced within Condition 23 to reflect the renumbered tables and addition of Figure 2 for clarity. Correction to spelling mistakes in Parameters in Table 13. Update to condition number referenced within Table 13 for the leachate extracted from leachate sumps 1 (Cell 1) and 2 (Cell 5).
Condition 24 Table 14 Table 15	Condition 30 Table 15 Table 16	Condition retained and renumbered. Update to table numbers referenced within Condition 24 to reflect the renumbered tables and addition of Figure 2 for clarity. Update to condition numbers referenced within the Methods of Table 14 and Table 15. Correction to spelling mistakes in Parameters in Table 15. Updated list of groundwater monitoring bores in Table 15 as requested by the Licence Holder to delete GMB1, GMB2, MW03, MW07 and MW08. Replacement bores MW09, MW10 and MW11 have already been included in condition 24, Table 15.

Condition no.	Previous condition no.	Proposed amendments
Condition 25	Condition 31	Condition retained and renumbered. Update to condition number referenced within condition 25.
Condition 26	Condition 32	Condition retained and renumbered.
Condition 27	Condition 38	Condition retained and renumbered. Update to condition numbers referenced within condition 27.
Condition 28	Condition 35	Condition retained and renumbered. The requirements of condition 36 for complaint information (a), (b) and (c) have been incorporated into condition 28, to correct the typo error in the numbering system.
N/A	Condition 36	Condition 36 deleted and complaint information (a), (b) and (c) moved into Condition 28 to correct the typo error in the numbering system.
Condition 29	Condition 37	Condition retained and renumbered.
Condition 30	Condition 35	Condition retained and renumbered. Update to condition numbers referenced within condition 30.
Condition 31 Table 16	Condition 36 Table 17	Condition retained and renumbered. Update to condition numbers referenced within Table 16 and addition of condition numbers associated with the tables for clarity. Correction to the condition number relating to the Complaint summary.
Condition 32 Table 17	Condition 37 Table 18	Condition retained and renumbered. Update to condition numbers referenced within condition 32. Update to table numbers referenced within Table 17 and addition of condition numbers associated with the tables for clarity.
Condition 33	Schedule 3	The requirements of Schedule 3 reporting of Reportable Events that may occur under condition 16, have been moved to condition 33. Addition of condition numbers associated with the tables for clarity.
Condition 34	Condition 33	Condition retained and renumbered. Update to condition numbers referenced within condition 34. Condition 33(b) books on the works becomes redundant with the deletion of condition 5. As such, condition 33(b) has been deleted. Condition 33 (c) books on high-risk clinical waste becomes redundant with the deletion of this waste from condition 1 Table 1. As such, condition 33 (c) has been deleted.
Condition 35	Condition 34	Condition retained and renumbered. Update to condition numbers referenced within condition 35.

Condition no.	Previous condition no.	Proposed amendments
Definitions Table 18	Definitions Table 19	<p>Amendment to the definition of 'EMP – Leachate Management' to refer to the live document authored and maintained by Veolia, and 'premises' to refer to Figure 1 to reflect the renumbered figures.</p> <p>Addition of definitions for 'approved form', 'FOGO decontamination plant', and 'SUEZ'.</p> <p>Deletion of definitions for 'Code of Practice for Clinical and Related Waste Management', 'Environmental Harm', 'High-risk clinical waste', 'Material Environmental Harm', 'Primary Activities', 'Serious Environmental Harm' and 'Unreasonable Emission'.</p> <p>Deletion of definitions 'HCB', 'PCE' and 'TCE' and addition of phrases to Tables 13 and 15, plus correction to spelling mistake of trichloroethylene.</p>
Schedule 1 Figure 1 Figure 2	Schedule 1 Figure S1-1 Figure S1-2	<p>Figure S1-1 retained and renumbered Figure 1.</p> <p>Figure S1-2 deleted and replaced with Figure 2 to reflect the current infrastructure, storage areas, monitoring bores and future landfill cells.</p>
N/A	Schedule 2 Table 20 Site layout	<p>Schedule deleted. Information adequately contained in condition 5 Table 3 and 4, condition 7 Table 5 and condition 9 Table 6.</p> <p>Site layout description is redundant text. Deleted as per current licensing format.</p>
N/A	Schedule 3 Figure S3-3	<p>Monitoring reports for Reportable Events within Schedule 3 have been deleted and the notification requirements for Reportable Events have been incorporated into condition 33.</p> <p>Figure S3-3 has been deleted as the information is outdated and adequately contained in Figure 2 of Schedule 1.</p>
N/A	Schedule 4 Table 21: Leachate pond 2 construction requirements	<p>The Licence Holder has satisfied the requirements of the construction requirements of Schedule 4 for leachate pond 2 with the submission of the Construction Quality Assurance Validation Report lodged in accordance with condition 9.</p> <p>As such, Schedule 4 and Table 21 are redundant so have been deleted.</p>
N/A	Schedule 5 Table 22: Works Specifications Compost Area Expansion Table 23: CQA Testing Figures S6-1, S6-2, S6-3	<p>The Licence Holder has satisfied the requirements of the works specifications and CQA testing of Schedule 5 for the compost area expansion with the submission of the Construction Quality Assurance Validation Report lodged in accordance with condition 9.</p> <p>As such, Schedule 5, Table 22, CQA testing in Table 23 and Figures S6-1, S6-2, S6-3 are redundant so have been deleted.</p>
N/A	Schedule 6 Table 24:	<p>The Licence Holder has satisfied the requirements of the works specifications of Schedule 6 for cells 5 and 6 with the submission of the Construction Quality Assurance Validation Report lodged in</p>

Condition no.	Previous condition no.	Proposed amendments
	Works Specifications Cells 5 and 6 Figure S7-4 Table 25: CQA Requirements	accordance with condition 9. As such, Schedule 6, CQA table and Figure S7-4 are redundant so have been deleted.
N/A	Schedule 7 Table 26: Works Specifications Leachate Ponds 3 and 4 Figure S8-5 Table 27: CQA Requirements	The Licence Holder has satisfied the requirements of the works specifications of Schedule 7 for leachate ponds 3 and 4 with the submission of the Construction Quality Assurance Validation Report lodged in accordance with condition 9. As such, Schedule 7, CQA table and Figure S8-5 are redundant so have been deleted.

## 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.
4. Golder Associates, 2017, *Design Report for Leachate Pond 3, North Bannister Resource Recovery Park*.
5. Golder Associates Pty Ltd, 2022, *Construction Quality Assurance Report Leachate Pond 3 Construction at North Bannister Resource Recovery Park*.
6. IW Projects Pty Ltd 2021, *North Bannister Resource Recovery Park Works Approval Application – FOGO Decontamination Facility Supporting Documentation*.
7. Talis Consultants Pty Ltd, 2019a, *CQA Validation Report - Cell 5 Construction North Bannister Resource Recovery Park*.
8. Talis Consultants Pty Ltd, 2019b, *CQA Validation Report – Leachate Pond B North Bannister Resource Recovery Park*.
9. Talis Consultants Pty Ltd, 2022, *Addendum CQA Validation Report - Leachate Pond 4 Construction North Bannister Resource Recovery Park*.
10. Talis Consultants Pty Ltd, 2023, *Addendum CQA Validation Report - Cell 6 Upper Slopes North Bannister Resource Recovery Park*.
11. Veolia Recycling and Recovery (Perth) Pty Ltd 2023, *Environmental Compliance Report North Bannister Resource Recovery Park DWER Works Approval: W6668/2022/1*.



## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY				
<b>Application type</b>				
Works approval	<input type="checkbox"/>			
Licence	<input type="checkbox"/>	Relevant works approval number:		None <input type="checkbox"/>
		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:		
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:	L8871/2014/2	
		Relevant works approval number:	N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:	None	<input type="checkbox"/>
Date application received	20 December 2023			
<b>Applicant and Premises details</b>				
Applicant name/s (full legal name/s)	Veolia Recycling and Recovery (Perth) Pty Ltd			
Premises name	North Bannister Resource Recovery Park			
Premises location	6364 Albany Highway North Bannister WA 6390			
Local Government Authority	Shire of Boddington			
<b>Application documents</b>				
HPCM file reference number:	DWERDT884465			
Key application documents (additional to application form):	Supporting Documentation - North Bannister Resource Recovery Park Licence Amendment Application Works approval and licence amendment fee calculation			
<b>Scope of application/assessment</b>				
Summary of proposed activities or changes to existing operations.	Licence amendment <ul style="list-style-type: none"> <li>• a change to the licence holder name;</li> <li>• update list of active groundwater monitoring bores;</li> <li>• increase in FOGO acceptance to 40,000 tonnes per annum;</li> <li>• reduction in freeboard in leachate pond 1;</li> <li>• use of blended organics as daily cover material; and</li> </ul>			

	<ul style="list-style-type: none"> <li>relocation of designated tyre stockpile area.</li> </ul>	
<b>Category number/s (activities that cause the premises to become prescribed premises)</b> <b>Table 1: Prescribed premises categories</b>		
Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 57 used tyre storage	1000 tyres	N/A
Category 61 liquid waste facility	16,000 tonnes per annum	N/A
Category 61A solid waste facility	90,000 tonnes per annum	N/A
Category 62 solid waste depot	14,000 tonnes per annum	N/A
Category 64 Class II or III putrescible landfill	400,000 tonnes per annum	N/A
Category 67A compost manufacturing and soil blending	100,000 tonnes per annum Inclusive of 10,000 tonnes per annum FOGO	100,000 tonnes per annum Inclusive of 40,000 tonnes per annum FOGO
<b>Legislative context and other approvals</b>		
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"/>	N/A
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input checked="" type="checkbox"/>
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	N/A
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"/>	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"/>	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"/>	Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Name: Murray River System and Serpentine River System

section 57 of the EP Act)?		Type: Proclaimed Surface Water Areas Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i> )	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
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"/>	N/A