



Department initiated Amendment

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

Licence Number	L8966/2016/1
Licence Holder	Appala Holdings Pty Ltd T/A Wastetrans WA
ACN	009 360 730
File Number	DER2016/000629-1~11
Premises	Postans Glass Processing & Waste Sorting Facility 119 McLaughlan Road POSTANS WA 6167 Legal description - Part of Lot 2129 on Deposited Plan 173137 As defined by the Premises maps in Schedule 1 As defined by the coordinates in Schedule 1
Date of Report	10 December 2024
Decision	Revised licence granted

**MANAGER WASTE INDUSTRIES
REGULATORY SERVICES**

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

1. Decision summary

The Delegated Officer has determined to make amendments to Licence L8966/2016/1. The amendments are administrative in nature therefore they do not alter the risk profile of the Premises, providing that activities, emissions and receptors as stated in existing approvals remain unchanged.

This Amendment Report documents the amendments made pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986* (EP Act).

The decision report for the Existing licence will remain on the department's website for future reference and will act as a record of the department's decision making.

1.1 Regulatory framework

In amending the licence, 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>.

1.2 Amendment summary

Licence L8966/2016/1 is held by Appala Holdings Pty Ltd (Licence Holder) for the Postans Glass Processing & Waste Sorting Facility (the Premises), located at 119 McLaughlan Road, Postans.

The Premises relates to the Category 61A: Solid waste facility and the assessed production/design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in existing Licence L8966/2016/1.

The department considers there to be insufficient time to complete a licence renewal prior to the current licence expiry. In recent years the department has discussed with the licence holder potential improvements that could be made to the premises categories and infrastructure specifications. To date the licence holder has not submitted related information or submitted a licence amendment. Additionally, preliminary findings of a recent premises inspection undertaken on 18 September 2024 identified a fire has occurred at the premises, which may have impacted existing infrastructure. These preliminary findings identified specific concerns regarding leachate and windblown waste emissions.

The department has initiated an amendment to Licence L8966/2016/1 to extend the licence duration for 12 months to ensure the current licence continues to remain in force, providing time for the department to finalise their inspection findings, and provide sufficient time for the licence holder to complete a full renewal application for the following year.

A risk assessment has been carried out in section 2 for leachate, windblown waste and fire emissions as identified as concerns by the recent premises inspection. The licence has been amended to require information be submitted to the department.

2. 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.

2.1 Source-pathways and receptors

2.1.1 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 1 below. Table 1 also details the existing regulatory controls that are specified as conditions on existing Licence L8966/2009/2.

Table 1: Existing regulatory controls relating to leachate, windblown waste and fire within L8966/2009/2

Emission	Sources	Potential pathways	Existing regulatory controls
Leachate	Potentially contaminated stormwater pooling at the premises	Seepage, spills and discharge to land	Licence conditions for infrastructure, equipment and processing to ensure sufficient management of potentially contaminated stormwater. Conditions include: Condition 3, Table 2, Row 2 - <i>Infrastructure and equipment</i> Condition 4, Table 3, Row 1 and 4 - <i>Waste processing</i>
Windblown waste	Acceptance, sorting and processing of waste	Air/windborne pathway causing impacts to health and amenity of closest human receptors	Licence conditions to ensure appropriate windblown waste management on the premises. Condition 4, Table 3, Row 3 h) and i) - <i>Waste processing</i>
Fire	Smoke and firefighting wash waters	Airborne smoke and fumes from uncontrolled fire to human and environmental receptors. Overland runoff or percolation of wash waters into soil and groundwater.	Licence conditions to ensure sufficient firewater containment preventing overland runoff of wash waters into soil and groundwater during a fire event. Conditions include: Condition 3, Table 2, Row 1 (b) – (e), Row 2 - <i>Infrastructure and equipment</i>

2.1.2 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 2 below provides a summary of potential human and environmental receptors that may be impacted by as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

Table 2: Sensitive human receptors and distance from prescribed activity

Receptors	Distance from prescribed activity
Human receptors	
Orelia residential area	810 m south of the premises boundary.
Industrial receptors	175 m north and 120 m west of the premises boundary.
Environmental receptors	
Groundwater	Depth to groundwater across the premises ranges from approximately 9 - 14.5 mbgl, with shallower depths experienced on the eastern boundary of the premises.
Beeliar Regional Park	300 m east of the Premises boundary.
Bush Forever Site 269, associated with the Spectacles wetlands.	
Threatened and Priority Fauna - Potential presence of <i>Isodon fusciventer</i> (Priority 4), <i>Oxyura australis</i> (Priority 4), <i>Calyptorhynchus latirostris</i> (Endangered), <i>Lerista lineata</i> (Priority 3) and various migratory bird species determined through survey and observational records within Bush Forever site 269 and associated with the Spectacles wetland.	
Threatened and Priority Ecological Communities - Banksia dominated woodland of the Swan Coastal Plain IBRA Region (BC Act priority 3) / Banksia Woodlands of the Swan Coastal Plain (EPBC Act Endangered)	Remnant vegetation immediately surrounding the Premises.

2.2 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 2.1. 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 2.1), 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 3.

The revised Licence L8966/2016/1 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 3: Risk assessment of potential emissions and discharges from the premises during operation.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Existing regulatory controls			
Solid waste acceptance, sorting and processing	Leachate	<p>Pathways: Seepage, spills and discharge to land</p> <p>Impacts: Soil contamination, ecosystem disturbance and impacts to water quality</p>	Underlying groundwater (approximately 9 - 14.5 mbgl)	See Table 1	<p>C = Minor L = Likely Medium Risk</p>	<p>Existing licence conditions</p> <p><u>New Condition 37 requiring an Infrastructure Report summarising recent fire damage</u></p> <p><u>New Condition 38 requiring a Stockpile Management Plan.</u></p>	<p>The current licence contains sufficient conditions for ongoing leachate management under typical operations, however preliminary inspection findings show that leachate drainage may be insufficient due to stockpile management and recent fire damage at the premises.</p> <p>The delegated officer considers that an additional condition requiring that all drains remain clear will ensure that the existing infrastructure is appropriately used.</p> <p>Additionally, an improvement condition is considered necessary to assess current infrastructure and stockpiles are appropriately managed and to inform any future changes to licence controls.</p>
	Windblown waste	<p>Pathways: Air/windborne</p> <p>Impacts: Health, amenity and ecosystem disturbance</p>	Industrial (175 m north and 120 m west of the premises boundary)	See Table 1			
Fire incident during processing and stockpiling	Fire/Smoke	<p>Pathways: Air/windborne</p> <p>Impacts: Soil contamination and impacts to water quality (washwaters). Ecosystem disturbance Health and amenity</p>	Human and environmental receptors listed in Table 2	See Table 1	<p>C = Moderate L = Possible Medium Risk</p>	<p>Existing licence conditions</p> <p><u>New Condition 37 requiring an Infrastructure Report summarising recent fire damage</u></p> <p><u>New Condition 39 requiring a Fire Management Plan to be developed and submitted for the Premises</u></p>	<p>The Delegated Officer considers the recent fire at the premises demonstrates fires at the premises are possible.</p> <p>Improvement conditions are considered necessary to assess current infrastructure and stockpiles are appropriately managed and to inform any future changes to licence controls.</p>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Existing regulatory controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by the department through this amendment.

3. Consultation

The Licence Holder was provided with the draft Amendment Report on 31 October 2024.

On 21 November 2024 the comment period lapsed with no comments received from the licence holder up until the issue of the amended licence on 10 December 2024.

4. Summary of amendments

Table 1 below provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated into the Revised licence as part of the amendment process.

Table 4: Summary of licence amendments

Condition no.	Proposed amendments
Cover page	Addition of date of issue
Duration	Extended to 10 December 2030
31	Annual Audit Compliance Report (AACR) condition updated
32	Complaints records condition updated
33	Annual Environmental Report (AER) condition updated
37	New condition for addition of infrastructure reporting submission and associated requirements
38	New condition for addition of Stockpile Management Plan submission and associated requirements
39	New condition for addition of Fire Management Plan submission and associated requirements
Definitions	Definitions updated: 'CEO', 'Quarantined storage area or container'
Schedule 3: N1 Form	AACR form is available from www.dwer.wa.gov.au N1 form is now considered redundant.