



Application for Licence Amendment

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

Licence Number	L8993/2016/1
Licence Holder	Cleanaway Pty Ltd
ACN	000 146 938
File Number	DER2016/001702-1
Premises	Guildford Materials Recovery Facility 72 Hyne Road SOUTH GUILDFORD WA 6055 Legal description – Lot 62 on Deposited Plan 6042 Certificate of Title Volume 1602 Folio 963 As defined by the Premises map in Schedule 1 of the Revised Licence
Date of Report	24 January 2023
Decision	Revised licence granted

A/MANAGER WASTE INDUSTRIES REGULATORY SERVICES

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

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1. Decision summary

Licence L8993/2016/1 is held by Cleanaway Pty Ltd (Licence Holder) for the Guildford Materials Recovery Facility (the Premises), located at Lot 62 on Diagram 60242, Certificate of Title Volume 1602 Folio 963, 72 Hyne Road, South Guildford.

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 L8993/2016/1 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>.

On 30 August 2022, the Licence Holder submitted an application to the department to amend Licence L8993/2016/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendment is being sought:

- Remove restrictions on the use of specific baled waste storage bunkers for specific material types (paper/cardboard, plastic and steel/aluminium (Mild Steel - ML)).
 - Storage within the bunkers is proposed to be managed so that no intermingling of paper/cardboard, plastic or ML bales occurs within individual stacks or rows within the bunkers, so that a row will only contain one type of material at a time.

This amendment is limited only to changes to Category 62 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 61 and 61A have been requested by the Licence Holder.

Due to use of the term 'pile' in the application documents, the department had initially interpreted the intent of the application to be for storage of one type of material at a time in any bunker. The Licence Holder subsequently provided comments that indicated this was not the case and the intent was for individual stacks and rows within the bunkers only containing one type of material at a time.

Additional comments were also provided requesting that requirements to store non-combustible steel/aluminium bales in the bunkers be removed.

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 operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Licence Holder controls

Emission	Sources	Potential pathways	Controls
Smoke and particulate matter	Baled solid waste storage	Air/windborne pathway	<ul style="list-style-type: none"> The existing fire sprinkler system installed to each of the Finished Product Store bunkers meets the requirements of Australian Standard <i>AS 2118.1-2017: Automatic fire sprinkler systems</i> Section 11.6 for Category 6 goods (plastics, etc.) and Section 12.3 for High Piled Storage for Baled Fibre products (specifically Table 12.3.3(C)). <p>Due to the type of sprinklers used in the system, both waste types have the same requirement of 25 sprinklers operating at 350 kPa according to <i>AS 2118.1-2017</i>. As a result, the system is considered suitable to:</p> <ul style="list-style-type: none"> provide protection to a bunker containing either baled paper/cardboard or baled plastic in separate stacks (i.e. not intermingled); and provide protection to a bunker to be used for storage of non-combustible Waste (e.g. steel or aluminium cans). <ul style="list-style-type: none"> The bunkers are contained on three sides with fire-resistant walls and a roof. Bales facing the front of the bunker are only stacked 2-bales high. The front of the bunkers are provided with fixed position water monitors for fire response. Aspirating fire detection and alarm system. Fire hose reels and extinguishers are provided. 6-month independent testing of fire detection and control systems.
Fire wash waters	Extinguishing of a solid waste fire	Overland runoff Seepage through soil to groundwater	No additional controls are proposed.

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 2 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 2: Sensitive human and environmental receptors and distance from prescribed activity

Receptors	Distance from prescribed activity
Human receptors	
Residential areas	Approximately 270 m northeast and 410 m northwest of the Premises boundary.
Industrial premises	Adjacent to the east, north and west of the Premises boundary.
Environmental receptors	
Groundwater	<p>Regional information suggests groundwater is located approximately 4.5 m below ground level (mBGL) and 5.8 mAHD across the Premises.</p> <p>Groundwater levels measured at the Premises during monitoring conducted in September 2019 were 8.5 - 8.6 m AHD or approximately 1.4 mBGL considering the topography of the Premises.</p> <p>Regional groundwater flow is northwest to westerly towards the Swan River. Investigations undertaken during February 2020 indicate that local groundwater flow at the Premises may be radial, however further investigation is required to confirm this.</p> <p>Currently there are no registered groundwater bore users located within 500 m of the Premises. The residential area located down regional hydraulic gradient from the Premises is mapped as unsuitable for garden bore use.</p>
Swan River	<p>Approximately 600 m to the northwest of the Premises boundary.</p> <p>A pathway from the Premises to this receptor exists via the connecting stormwater network, with a flow path of approximately 895 m.</p>
Geomorphic wetlands of the Swan Coastal Plain (resource enhancement or conservation management category)	Approximately 430 m east (resource enhancement sumpland ID9009) and 630 m southwest (Swan River floodplain) of the Premises boundary.
Important wetlands	Approximately 290 m southwest of the Premises boundary.
Bush Forever Site 386	Approximately 100 m south of the Premises boundary.

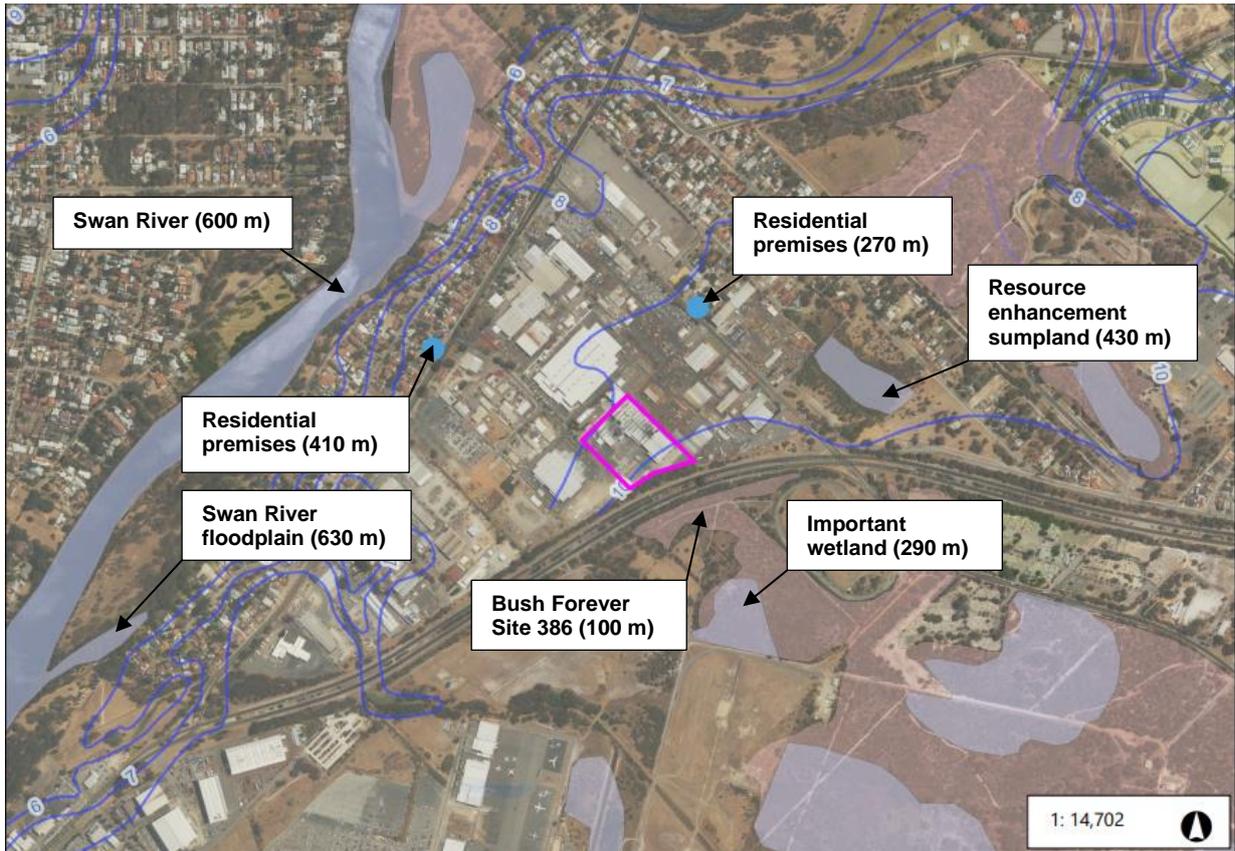


Figure 1: Potential receptors surrounding the premises. The premises boundary is shown by the pink line.

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the Licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Licence L8993/2016/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. category 61, solid waste facility activities.

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	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				
Operation								
Bunkers for baled solid waste storage (removal of requirements to store waste in specified areas)	Smoke and particulate matter	Air/windborne pathway causing impacts to health and amenity	Residential areas (260 m northeast and 400m northwest)	See Section 3.1.1	No change to previous risk rating, as per DWER's assessment dated 14 August 2020 . C = Major L = Possible High risk rating	Y	4: Table 4 (storage bunkers) 4: Table 4 (restricting mixed waste storage)	The Delegated Officer has considered the Fire Safety Engineers supporting advice and previously submitted environmental compliance reporting and determined that the current fire controls remain adequate for the proposed change to operations. The fire sprinkler system meets the relevant Australian Standard for all waste types proposed for storage within the bunkers. The fire-resistant roof and bunker walls are designed to prevent migration of fire between the bunkers, with the open face provided with fixed position water monitors. The change to storage arrangements would not increase the likelihood of fire spreading between bunkers. The Delegated Officer considers that the risk profile at the Premises has not changed.
	Fire wash waters	Overland runoff causing impacts to water quality, terrestrial and aquatic ecosystems	Groundwater Important wetlands (300 m southeast, 430 m east and 600 m southwest) Swan River (600 m)	See Section 3.1.1	No change to previous risk rating, as per DWER's assessment dated 14 August 2020 . C = Major L = Possible High risk rating	Y	N/A	The Delegated Officer considers the current fire wash water controls are sufficient to contain contaminated wash waters in the event of a fire.

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. **Additional regulatory controls** depicts additional regulatory controls imposed by department.

Licence: L8993/2016/1

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website (13/10/2022)	Refer to Appendix 2	Refer to Appendix 2
Local Government Authority advised of proposal (13/10/2022)	None received.	None received.
Guildford Association advised of proposal (13/10/2022)	Refer to Appendix 2	Refer to Appendix 2
Licence Holder was provided with draft amendment (2/12/2022)	Refer to Appendix 1	Refer to Appendix 1
Licence Holder was provided with 2 nd draft of amendment (23/12/2022)	The Licence Holder provided a response on 12 January 2023 to proceed with finalisation of the amended licence, as they had reviewed the proposed amendments and had no further comments.	N/A

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 5 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 5: Summary of Licence amendments

Condition no.	Proposed amendments
<u>Revised</u> Removed <u>Existing</u> 1	Construction complete and compliance met; condition removed.
<u>Revised</u>	Compliance met; condition removed.

Condition no.	Proposed amendments
Removed <u>Existing</u> 2	
<u>Revised</u> Removed <u>Existing</u> 3	Compliance met; condition removed.
<u>Revised</u> Removed <u>Existing</u> 4	Compliance met; condition removed.
<u>Revised</u> Removed <u>Existing</u> 5	Compliance met; condition removed.
<u>Revised</u> Removed <u>Existing</u> 6	Compliance met; condition removed.
<u>Revised</u> Removed <u>Existing</u> 7	Compliance met; condition removed.
<u>Revised</u> 1 <u>Existing</u> 8	Numbering updated.
<u>Revised</u> 2 <u>Existing</u> 9	Numbering updated.
<u>Revised</u> 3 <u>Existing</u> 10	Numbering updated. Condition updated to the departments current condition wording format and timeframe included for enforceability.
<u>Revised</u> 4	Condition wording removed and amended to allow waste bale storage within any one of the bunkers. A condition was also added allowing flexibility in the storage of metal can bales due to their non-combustible nature.

Condition no.	Proposed amendments
<u>Existing</u> 11 (Table 3)	Lettering of other requirements updated where relevant.
<u>Revised</u> 5 <u>Existing</u> 12	Numbering updated.
<u>Revised</u> 6 (a)(b) <u>Existing</u> 13 (a)(b)	Condition wording amended to provide clarity that stockpile heights and separation distance refers to loose stockpiles of waste.
<u>Revised</u> 7 (Table 4) <u>Existing</u> 14 (Table 4)	Numbering updated. Reference to Vehicle Washdown Bay removed as this was not constructed due to the Licence Holder no longer intending to carry out this activity.
<u>Revised</u> Removed <u>Existing</u> 15	Condition removed. No washing of vehicles to occur at the Premises.
<u>Revised</u> 8 <u>Existing</u> 16	Numbering updated. Wording updated for enforceability and consistency.
<u>Revised</u> 9 <u>Existing</u> 17	Numbering updated. Wording updated for enforceability and consistency.
<u>Revised</u> 10 <u>Existing</u> 18	Numbering updated. Unenforceable words removed.
<u>Revised</u> 11 <u>Existing</u> 19	Numbering updated. Wording updated for consistency and timeframe included for enforceability of condition.
<u>Revised</u> 12 <u>Existing</u>	Numbering updated.

Condition no.	Proposed amendments
20	
<u>Revised</u> 13 - 17 <u>Existing</u> 21 - 25	Numbering updated.
Definitions	Redundant definitions for terms no longer used in the Revised Licence were removed.
Schedule 1 (Figure 1)	Premises boundary map updated to more recent figure
Schedule 1 (Figure 3)	Site services plan updated to remove reference to specific bunkers for specific waste.

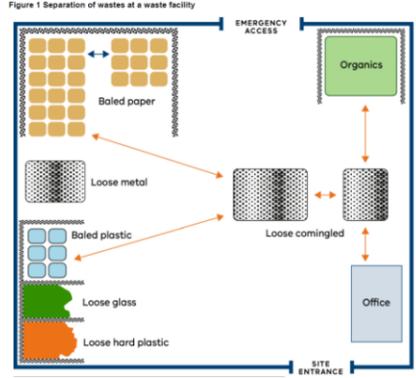
References

1. Australian Standard AS 2118.1-2017: *Automatic fire sprinkler systems*.
2. Department of Environment and Science Queensland 2020, *Guideline – Prevention of fires in waste stockpiles*, Queensland.
3. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Fire and Emergency Services (DFES) 2020, *Fire Prevention and Management in a Recycling Facility*, Perth, Western Australia.
5. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
6. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
7. Environmental Protection Authority Victoria (VIC EPA) 2021, *Management and storage of combustible recyclable and waste materials – guideline*, Carlton, Victoria.
8. Fire and Rescue New South Wales 2020, *Fire safety guideline: Fire safety in waste facilities*, New South Wales.
9. Waste Industry Safety and Health Forum (WISH) 2020, *Reducing fire risk at waste management sites*, United Kingdom.

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

Condition	Summary of Licence Holder's comment	Department's response
Condition 4: Table 3 (b) and (c)	<p>Cleanaway requests removal of proposed clause (c) of Table 3: Waste Processing and that clause (b) is reworded to the following:</p> <p>'Bales must be stored within the Bunkers shown in Schedule 1: Figure 3. When more than one baled waste type is stored in a bunker, the materials are to be in separate piles (rows) and not intermingled'.</p> <p>As outlined in the application document, Cleanaway understands that the rationale for specifying bunkers for the storage of specific waste types was due to Australian Standard AS 2118.1-2017: 'Automatic fire sprinkler systems General system' (the Standard), which identifies requirements for the following hazard types:</p> <ul style="list-style-type: none"> • High Hazard – Special Commodities (Baled Fibres and Waste Paper Storage) for the fibre bunkers; and • High Hazard - Storage Sprinklers for Category 6 Commodities for the plastic storage area. <p>The Standard provides design options for sprinkler systems for the above hazard types, Cleanaway has received advice from a Fire Safety Engineer (refer Attachment 3B). The advice confirms that the fire sprinkler system installed at the Premises meets the requirements of the is suitable to:</p> <ul style="list-style-type: none"> • provide protection to bunkers containing a mixture of the baled paper/cardboard and baled plastic, in separate piles (i.e. not intermingled); and • is suitable for any of the bunkers to be used for storage of non-combustible product (e.g. steel or aluminium cans). <p>It is important to note that the four bunkers have been engineered and constructed such that fire is prevented from migrating between one bunker and the next. This is due to each bunker having its own roof and fire-rated walls. Additionally, each bunker has a dedicated water cannon. When taken together these controls provide separation between baled products and no further separation controls are required.</p>	<p>References to piles within the application were interpreted to refer to the entire contents of a bunker, not one row of waste bales. As such as the application had been progressed with this interpretation in mind.</p> <p>The assessment of the application has been revised in consideration of paper/fibre and plastics being able to be stored within the same bunker at the same time. The Delegated Officer has determined that there is no change to the previous risk rating risk for fire-related emissions from the Premises.</p>
Condition 4: Table 3 (b) and (c)	<p>In a subsequent phone conversation and email the Licence Holder also requested that the existing requirement for aluminium and steel bales to be stored within the storage bunkers be removed.</p>	<p>The Delegated Officer notes that aluminium and steel bales are a non-combustible waste type. The controls provided in the bunkers are not necessary for storage of this material type.</p> <p>The bales should be stored in a manner that does not compromise access to any fire response systems or equipment.</p>

Appendix 2: Stakeholder consultation summary

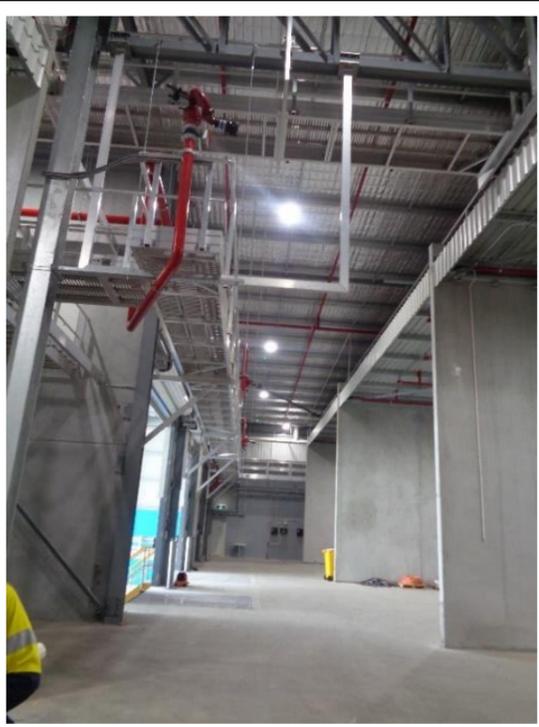
Comments received		Department's response
<p>National Toxics Network responded on 7 November 2022.</p>	<p>I hereby object to this licence amendment for the following reasons.</p> <ol style="list-style-type: none"> Cleanaway has not justified this proposed licence amendment. There is no detailed explanation provided to explain why there is a need to use all four bunkers interchangeably or allow bales of plastic waste to be stored in the same bunker as paper/cardboard waste and/or metals waste on any occasion. The Fire Safety advice provided by Cleanaway to justify their amendment refers to the adequacy of their sprinkler systems and while it is reassuring to see that Stantec regards the current sprinkler system as adequate, their original assessment and approval was based on the separate storage of waste bales in separate bunkers. The importance of and original requirement for, waste separation to prevent fires, appears to have been lost. <p>These bunkers were designed to keep waste bales separate so as to reduce the spread of fires and ignition of high hazard materials such as paper/cardboard and plastic. We consider it insufficient to rely solely on sprinkler systems for fire protection at this facility if the bales of different waste materials will be allowed to be stored in the same bunker. In effect, this proposed licence amendment defeats the purpose of having any separate waste bunkers. It therefore begs the question as to why Cleanaway wants to operate a facility that stores bales of mixed plastic waste in the same bunker as bales of paper and cardboard waste or why the regulator would require separate waste bunkers as a "fire prevention measure" originally in their new revised licence following their reconstruction, only to amend their licence to effectively undo such a requirement?</p> <p>Separate storage of waste materials is an important requirement that should not be lost. Most fire safety guidelines in Australia recognise and recommend separate materials storage as a key fire safety feature. For example, EPA Victoria, Management, and storage of combustible recyclable and waste materials guideline July 2021, and the Qld Department of Environmental Service and Regulation, Guidelines: Prevention of fires in waste stockpiles, 2020, as just two examples.</p> <p>Separate waste storage provides a physical distance for large stockpiles of highly flammable materials reducing the opportunity for fires to spread. Separate bunkers also ensure that in the event of a fire, the company and firefighters know what material they are dealing with. These materials have different ignition temperatures, flammability features and ability to ignite neighbouring waste stockpiles. It is simply common sense to keep waste stockpiles separated for safety, access, scrutiny and to reduce contamination.</p>  <p>Furthermore, given Australian waste companies have been found to export waste to Southeast Asia, declared as exports of recyclable paper/cardboard bales but found to be contaminated with mixed plastic waste, regulators in Australia must ensure that there is no opportunity for waste management companies to hide mixed plastic waste in bales of paper/cardboard exports. Thailand recently reported that contaminated bales of waste came from Australia including WA. Thailand has now banned the importation of such wastes. Should Cleanaway be permitted to store paper/cardboard bales with mixed plastic waste bales, it will become difficult to monitor this situation for compliance and ensure cross contamination is not occurring.</p> <p>Please accept this objection to the proposed licence amendment for Cleanaway L8993/2016. While this facility has no social licence to operate in our community, we encourage Cleanaway to invest in better technology and practices to produce cleaner recyclable waste resources and improve their collection and source separation services to enable better quality feedstocks for the recycling, reuse and composting sectors.</p>	<p>The same level of separation via a fire-rated bunker wall and roof is present between the previously labelled fibre bunkers and the plastic bunker. Additionally, the provided fire safety advice concludes that the fire sprinkler system that is present in each bunker is the same and meets the requirements for baled storage of both waste types according to AS 2118.1-2017. The design intent of the bunkers, being to separate baled stockpiles into smaller volumes, reduce the spread of fires and ignition of high hazard materials, is still met when considering the change to operations.</p> <p>Fire protection and mitigation at the facility does not rely solely on the sprinkler system provided to the bunkers. The following controls are also provided:</p> <ul style="list-style-type: none"> The bunkers are contained on three sides with fire-resistant walls and a roof to prevent the spread of fires between bunkers. The front of the bunkers are provided with fixed position water monitors for early response. Additional to the sprinkler systems provided within the bunkers, the Finished Product Store (in which the bunkers are located) is also provided with a sprinkler system at ceiling level. Fire resistant walls and a rapid-close doors separate the Finished Product Store from the rest of the facility. An aspirating fire detection and alarm system is provided for early detection of fires. Fire hose reels and extinguishers are provided for early response. 6-month independent testing of the fire detection and control systems are carried out at the Premises. <p>Photos of the relevant fire related controls at the Premises are provided in Appendix 3.</p> <p>The condition requiring specific bunkers to be used for specific waste types was included in the Existing Licence due to AS 2118.1-2017 providing different system design configuration options that depend on temperature ratings and pressure ratings of the sprinklers used. Detail on these ratings was not included in the previous amendment application, so a restrictive condition was included to account for the fibre bunkers potentially having a system that was not suitable for storage of plastic bales. Subsequently it has been demonstrated that the same system was installed to all bunkers and this system meets the requirements for all baled waste storage types at the Premises.</p> <p>The Delegated Officer notes that the <i>Guideline - Management and storage of combustible recyclable and waste materials</i> (VIC EPA 2021) is a holistic document that provides a number of recommendations and options for fire prevention and control at a recycling facility, of which separation of wastes according to material type is one. Other recommendations include reducing stockpile volumes, separating stockpiles by fire-resistant walls, suppression systems, etc. which have been adopted at the Premises. The presence or absence of other controls needs to be considered when determining if strict material separation is required.</p> <p>Contamination of waste being exported internationally is outside the scope of regulating emissions and discharges under Part V, Division 3 of the EP Act.</p> <p>During consultation on the draft amendment the Licence Holder has indicated that concerned stakeholders are welcome to request a site-visit of the Premises to view operations and controls within the storage bunkers.</p>

Comments received	Department's response
<p>Guildford Association responded on 7 November 2022</p> <p>On behalf of the Guildford Association Inc., I wish to object to the proposed amendment to the Cleanaway license L8993/2016/1. The original concerns about proximity to sensitive receptors (children' day care centre, residential housing and Swan River) remain. The waste industry is a fire prone industry, due in the main part, to poor recycling habits of the public. Inappropriately introduced batteries, flammable and combustible materials remain an ongoing waste industry problem.</p> <p>The Cleanaway license L8993/2016/1 provided for separate bunkers for plastic, metals, cardboard/paper and putrescible waste streams. It would appear that the proposed amendment seeks to</p> <ol style="list-style-type: none"> 1. mixed contents or reuse bunkers, so plastic and papers could be in the same storage bunker (albeit with remnant pieces of combustible or flammable materials) 2. that the height of storage be increased by 80 cm. <p>Mixing bunker use increases fire risk. The inherent risk of storing inert substances such as paper/ cardboard and plastics, arises from poor public recycling and contaminated waste streams. (eg plastic chemical storage containers or lithium batteries present in plastic waste). Further, paper is flammable when dry and combustible when damp). The risk in using bunkers for several materials, arises when, for example, a previous plastics bunker is used for cardboard/paper and has remnant batteries on the floor. The risk of damaging the batteries remains high when paper bales or simply piles of paper are placed in this bunker. Paper in previous plastics bunker, if damp could ignite in the presence of remnant plastics. This is the fire prone mature of the waste industry. It is noted that other states require strict separation of waste so as to avoid waste stream contamination and reduce fire risk.</p> <p>Strict separation was part of the original license conditions and this proposed amendment appears to undermine that intent</p> <p>Increased storage increases fire risk This proposal to increase storage capacity also increases the potential fire risk. The proponent's consultants, Stantec, advice there are adequate sprinklers to contain fires on site, however, as a nearby community we do not believe this is a satisfactory response. Increased storage is an increased fire risk. No fire large or small is satisfactory for the nearby community that may be affected by toxic fumes.</p> <p>Increased fires increase health risks Increased fire risk exposes the community to increased health risks and this has not been appropriately evaluated in the first License. The fire prone nature of the waste industry and its impacts on humans and the environment were noted in the Victorian parliamentary Inquiry 2016. After any fire event at Ckeanaway, South Guildford, burnt contents will be taken outside to a quarantine area in the car park, here they off gas potential toxic fumes to the neighbours. (Noting the nearest residential house is 80m, a day care centre is just over 100m and the Swan River 200m from this site)</p> <p>Increased storage increases transport on local roads. The proposed elevation of storage in bunkers will lead to an increase in waste transport vehicles, which impact local road safety, traffic volumes etc. This is an industry in a wrong location.</p> <p>The Guildford Association wishes to register an objection/appeal against this Amendment to the Cleanaway Licence L8993-2016 on the grounds that using bunkers for different materials is:</p> <ol style="list-style-type: none"> 1. Contrary to the original requirement of waste separation into different Bunkers as a fire management and containment strategy. 2. Increased storage has the potential to increase the risk of fire on the site 3. Has to potential to create health risks to the nearby community because of its proximity to housing, school, river and day care centre and use of outside quarantine area for burnt material post fire. 4. Aggravates the problems of a fire prone industry being located in an inappropriate area and too close to sensitive receptors 	<p>The Licence Holder is not proposing any increase to storage height. The bunkers were designed to store waste to a height of four bales and the Existing Licence condition is that baled fibre, paper and plastics stockpiles must not exceed 4 bales high. The previous assessment considered a bale to be 1.2 m high and the maximum height of baled storage to be 4.8 m. It appears there may be some confusion with the maximum height for loose stockpiles of 4 m, which is referred to in the Existing Licence as unsorted waste stockpiles. To clarify this, the relevant conditions will be changed to refer to loose stockpiles.</p> <p>Due to the presence of other controls at the facility, the Delegated Officer does not consider the risk of fire related emissions from the Premises will increase by implementing the application. The design intent of the bunkers, being to separate baled stockpiles into smaller volumes, reduce the spread of fires and ignition of high hazard materials, is still met when considering the change to operations. Fire protection and mitigation at the bale waste storage area of the facility includes the following controls:</p> <ul style="list-style-type: none"> - The bunkers are contained on three sides with fire-resistant walls and a roof to prevent the spread of fires between bunkers. - Each bunker is provided with an automatic sprinkler system. - The front of the bunkers are provided with fixed position water monitors for early response. - Additional to the sprinkler systems provided within the bunkers, the Finished Product Store (in which the bunkers are located) is also provided with a sprinkler system at ceiling level. - Fire resistant walls and a rapid-close doors separate the Finished Product Store from the rest of the facility. - An aspirating fire detection and alarm system is provided for early detection of fires. - Fire hose reels and extinguishers are provided for early response. - 6-month independent testing of the fire detection and control systems are carried out at the Premises. <p>Photos of the relevant fire related controls at the Premises are provided in Appendix 3.</p> <p>It is noted that other states do not require strict separation of waste types in all situations. Guideline documents from other jurisdictions provide a number of recommendations and options for fire prevention and control at a recycling facility, of which separation of wastes according to material type is one. Other recommendations include reducing stockpile volumes, separating stockpiles by fire-resistant walls, suppression systems, etc. which have been adopted at the Premises. The presence or absence of other controls needs to be considered when determining if strict material separation is required.</p> <p>The condition requiring specific bunkers to be used for specific waste types was included in the Existing Licence due to AS 2118.1-2017 providing different system design configuration options that depend on temperature ratings and pressure ratings of the sprinklers used. Detail on these ratings was not included in the previous amendment application, so a restrictive condition was included to account for the fibre bunkers potentially having a system that was not suitable for storage of plastic bales. Subsequently it has been demonstrated that the same system was installed to all bunkers and this system meets the requirements for all baled waste storage types at the Premises.</p> <p>The Licence Holder is not proposing any increase to storage capacity.</p> <p>The Delegated Officer does not consider that the risk rating for emissions and discharges resulting from a waste storage fire has changed as a result of the amendment (refer to Section 3).</p> <p>Issues regarding transportation on local roads is outside the scope of regulating emissions and discharges under Part V, Division 3 of the EP Act.</p> <p>During consultation on the draft amendment the Licence Holder has indicated that concerned stakeholders are welcome to request a site-visit of the Premises to view operations and controls within the storage bunkers.</p>

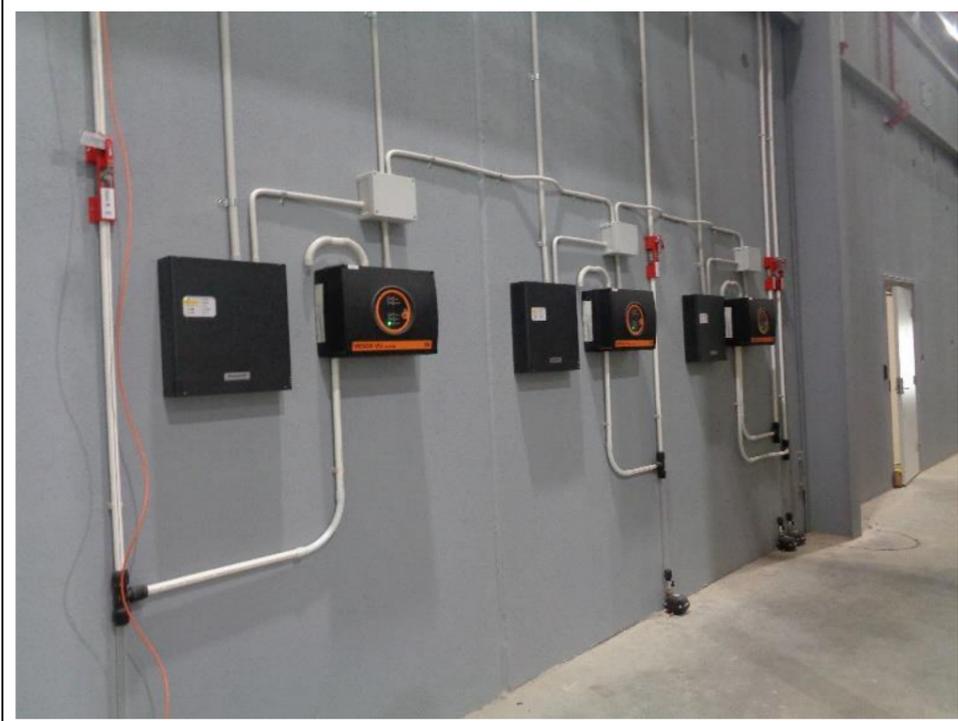
Appendix 3: Photographs of fire-related controls in the bunker storage area



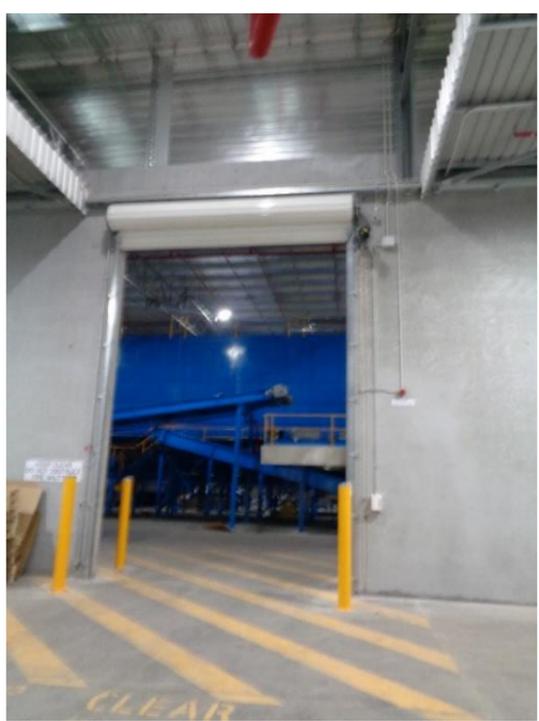
Photograph 1: Finished product store bunkers and fire sprinklers



Photograph 2: 3 x water monitors in the Finished Product Store



Photograph 3: Aspirating smoke detectors in the Finished Product Store



Photograph 4: Fire-rated walls and rapid close fire door separating the Production Area and Finished Product Store

Appendix 3: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)				
Application type				
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:	L8993/2016/1	
		Relevant works approval number:		N/A <input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None <input type="checkbox"/>
Date application received	30 August 2022			
Applicant and Premises details				
Applicant name/s (full legal name/s)	Cleanaway Pty Ltd			
Premises name	Guildford Materials Recovery Facility			
Premises location	Lot 62 on Diagram 60242, 72 Hyne Road, South Guildford WA 6055			
Local Government Authority	City of Swan			
Application documents				
HPCM file reference number:	DER2016/001702-1			
Key application documents (additional to application form):	<ul style="list-style-type: none"> Attachment 2 - Premises map; Attachment 3B - Fire advice; and Attachment 3C - Updated site plan. 			
Scope of application/assessment				
Summary of proposed activities or changes to existing operations.	<p>Operation of a solid waste facility:</p> <p>Amendment to Condition 11 (Table 3 (b), (c) & (d)) to facilitate the use of the indoor waste storage bunkers for different storage arrangements of baled fibre, plastic and mild steel.</p>			

Category number/s (activities that cause the premises to become prescribed premises)

Table 1: Prescribed premises categories

Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 61: Liquid waste facility	300,000 tonnes per annual period	N/A
Category 61A: Solid waste facility	500,000 tonnes per annual period (combined)	N/A
Category 62: Solid waste depot		

Legislative context and other approvals

Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input checked="" type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Type: N/A Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Regional office: Swan Avon

<p>Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Name: N/A Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>
<p>Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i>, <i>Environmental Protection (Controlled Waste) Regulations 2004</i>, <i>State Agreement Act xxxx</i>)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<ul style="list-style-type: none"> • <i>Health Act (Miscellaneous Provisions) 1911</i>; • Environmental Protection (Unauthorised Discharges) Regulation 2004; • <i>Emergency Management Act 2005</i>; • <i>Contaminated Sites Act 2003</i>; • <i>Building Act 2011</i>; • Planning and Development (Local Planning Schemes) Regulations 2015
<p>Is the Premises within an Environmental Protection Policy (EPP) Area?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises subject to any EPP requirements?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>On 25 November 2019 a fire destroyed the northwestern portion of the facility potentially causing contamination via infiltration through the soil and groundwater network at the premises. Classification: possibly contaminated – investigation required (PC-IR) Date of classification: 27 May 2020</p>