



Application for Licence Amendment

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

Licence Number	L9003/2016/1
Licence Holder	Eastern Metropolitan Regional Council
File Number	DER2016/002031
Premises	Hazelmere Resource Recovery Park 77 Lakes Road HAZELMERE WA 6104 Legal description – Lot 100 on Plan 4553, Lot 301 on Plan 405273 and Lot 814 on Plan 410889 and defined by the Premises map attached to the Revised Licence
Date of Report	15 June 2021
Proposed Decision	Revised licence granted

**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 L9003/2016/1 is held by Eastern Metropolitan Regional Council (EMRC) (Licence Holder) for the Hazelmere Resource Recovery Park (the Premises), located at 77 Lakes Road, Hazelmere.

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 L9003/2016/1 has been granted.

The Revised Licence issued as a result of this amendment supersedes the existing Licence previously granted in relation to the Premises. Existing conditions have been transferred, but not reassessed, in the Revised Licence.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary

In October 2020, the Licence L9003/2016/1 was amended under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act) to permit the following activities:

- Acceptance of up to 3,500 tonnes per annual period of chemically treated power poles to an existing hardstand;
- Sorting and separation of power poles into copper chromium arsenate (CCA) treated or hydrocarbon coated. This ratio is expected to be 50:50;
- Removal of metal attachments and supports to the power poles;
- Processing of hydrocarbon coated power poles by removing the coated pole butt using hydraulic timber shears;
- Temporary storage of CCA treated power poles and hydrocarbon coated pole butts in bulk bins prior to offsite disposal at a Class IV landfill; and
- Further processing of the uncoated pole section for stockpiling as woodchip and disposal in the existing wood waste to energy plant (WWTEP).

The amendment did not result in the addition of a Category or change in throughput to existing Categories.

This assessment relates to a subsequent amendment submitted by the Licence Holder on 11 February 2021 requesting increased throughput of these treated power poles from 3,500 tonnes to 15,000 tonnes, and removal of the requirement for waste storage in skip bins, given additional current storage in covered bays.

The only change to proposed activities associated with storage and processing of power poles is the increased throughput, requiring a larger storage area, intensified operation of the mechanical wood shears and removal/disposal via offsite transport the Red Hill Landfill or incineration onsite via the wood-waste to energy plant. The Licence Holder notes an increased demand for power pole disposal at the premises resulting from a statewide program for underground relocation of power lines and replacement of weathered and damaged poles.

This amendment is limited only to changes to Category 61A and 62 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 37, 60, or 67 have been requested by the Licence Holder.

Table 1 below outlines the proposed changes to the existing Licence.

Table 1: Proposed design capacity changes

Category	Current design capacity	Proposed design capacity	Description of proposed amendment
61A	50,000 tonnes per annual period 3,500 tonnes per annual period for power poles	Power pole acceptance increased to 15,000 tonnes per annual period	Segregated CCA treated poles will be stored in hook lift bins (on the power poles processing area) that are covered with tarps for transport to the Red Hill Waste Management Facility. The non-treated portion of the waste stream is proposed to be stored in hook lift bins on the power poles processing area The onsite C&I undercover facility is proposed as a temporary storage location during rainfall events.
62	50,000 tonnes per annual period	N/A	Dry commercial and industrial wastes for receipt, handling and storage prior to segregation are currently required to be stored in skip bins, however the Licence Holder stores these materials within storage bays in the undercover C&I facility. The amendment application therefore requests Table 4 of Condition 8 be amended to reflect this.

2.3 Part IV of the EP Act

On 14 January 2014 the Licence Holder referred the Hazelmere Wood Waste to Energy Plant to the EPA as a significant proposal under Section 38 of the EP Act. The EPA determined to assess the proposal at the level of Public Environmental Review on 31 March 2014. EPA Report No. 1554 was implemented subject to conditions. Subsequently Ministerial Statement (MS) 1028 was issued by the Minister for Environment. The following aspects of MS 1028 are considered relevant to the application:

- The proposal was to construct and operate a 4 megawatt indirect-fired pyrolysis kiln to process wood waste and produce synthesis gas for use as a fuel in internal combustion gas engines;
- The process limit for wood waste processed through the WWTEP is 13,000 tpa;
- The waste types permitted to be processed through the WWTEP are wood waste that has

not been treated or contaminated, such as uncontaminated shipping pallets, timber off-cuts, crates and cable reels;

The proponent is required to prepare and implement a Waste Acceptance Monitoring and Management Plan (WAMMP). The WAMMP further specifies the acceptable wood waste types for processing through the WWTEP and addresses monitoring for potential contaminant sources within the wood waste; to ensure that excess volumes and resultant contaminant materials authorised by this amendment are managed in accordance with MS 1028.

MS 1028 applies only to the Wood Waste to Energy Plant and not the whole premises. Therefore acceptance of power poles on to the premises is not restricted by MS 1028.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guidance Statement: Risk Assessments* (DER 2017).

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

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

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

Table 2: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Leachate/contaminated stormwater	Increased storage of treated timber	Seepage to soils and groundwater	Storage within covered skip bins over a bitumen hard stand
		Overland flow	
Noise	Increased operation of the timber shears	Air/ windborne pathway	Operation times limited to business hours

3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

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

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

Human receptors	Distance from prescribed activity
Closest residential receptors	Approximately 450 m southwest of the processing area
	Approximately 460 m west of the processing area
Industrial receptors	Approximately 110 m northeast of the processing area
	Approximately 100 m north of the processing area
	Approximately 160 m south of the processing area
Environmental receptors	Distance from prescribed activity
Surface water	Hazelmere Lake South is located approximately 530 m west of the processing area
	Hazelmere Lake North is located approximately 790 m west-northwest of the processing area
Groundwater	Groundwater of the Perth Superficial aquifer is located approximately 2.5 - 3.5 m below the processing area, based on groundwater investigations previously conducted at the premises. Local groundwater flow direction in the vicinity of the processing area is inferred to be towards the west. This is generally consistent with local topography and wetland mapping which support the presence of a potential flowpath from the processing area towards Hazelmere Lake South to the west. Regional groundwater flow direction of the Perth Superficial aquifer is to the north-west, towards Helena River. There are 5 groundwater bores located downgradient of the Premises, between the Hazelmere Lakes. 3 are associated with the Talloman Rendering plant monitoring network and two are located on residential properties and potentially used for non-potable purposes.
Threatened and Priority Ecological Communities (TEC)	Banksia Dominated Woodlands of the Swan Coastal Plain TEC, located approximately 495 m south Licence: L9003/2016/1 IR-T15 Amendment Report Template v2.0 (July 2020) 8 Banksia Dominated Woodlands of the Swan Coastal Plain TEC, located approximately 560 m west-southwest.

3.2 Risk ratings

Risk ratings have been assessed in accordance with the Guidance Statement: Risk Assessments (DER 2017) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

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

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 5.

The Revised Licence L9003 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 4. Risk assessment of potential emissions and discharges from the Premises operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Acceptance and storage of treated power poles	Leachate / contaminated storm water	Infiltration through soil to groundwater causing deterioration of water quality and potential impacts to down-gradient receptors	Groundwater (2.5 – 3.5 mbgl) Residences (450 m southwest and 460m west) Hazelmere Lake South (530 m west)	Refer to Section 3.1.1	C = Moderate L = Possible Medium Risk	Y	Condition 4: Waste acceptance Condition 8: Waste processing	N/A
		Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Hazelmere Lake South (530 m west) Hazelmere Lake North (790 m westnorthwest)	Refer to Section 3.1.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 4: Waste acceptance Condition 8: Waste processing	N/A
Decontamination of power poles using an excavator with a timber shear attachment	Noise	Air/windborne pathway causing impacts to amenity	Residences (450 m southwest and 460m west)	Refer to Section 3.1.1	C = Minor L = Possible Medium Risk	Y	Condition 4: Waste acceptance Condition 8: Waste processing	N/A

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

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

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4. Consultation

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

Table 5: Consultation

Consultation method	Comments received	Department response
EMRC was provided with the draft amendment package on 13 May 2021 (DWER ref: A20006961)	EMRC responded on the 13 May 2021 confirming that they had reviewed the draft amendment package and requested that we waive the consultation period with no further comments provided.	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 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 6: Summary of licence amendments

Condition no.	Proposed amendments
4 (Table 3: Treated power poles)	Authorised volume for treated power poles increased from 3,500 to 15,000
8 (Table 4: Treated power poles)	Authorised storage area for treated power poles amended to include the C&I Facility
8 (Table 4: Dry commercial and industrial waste)	Storage area for dry commercial and industrial waste amended to include undercover storage bays

References

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

Appendix 2: 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:	L9003/2016/1	
		Relevant works approval number:	N/A	<input checked="" type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:	None	<input checked="" type="checkbox"/>
Date application received	11 Feb 2021			
Applicant and Premises details				
Applicant name/s (full legal name/s)	Eastern Metropolitan Regional Council			
Premises name	Hazelmere Resource Recovery Park			
Premises location	Lot 100 on Plan 4553 (volume 1243, folio 87) and Lot 301 on Plan 405273 (Volume 2870)			
Local Government Authority	City of Swan			
Application documents				
HPCM file reference number:	DER2016/002031-1			
Key application documents (additional to application form):	Attachment 2 – Site plan of HRRP Attachment 7 - Siting and location – Proximity to sensitive receptors			
Scope of application/assessment				

<p>Summary of proposed activities or changes to existing operations.</p>	<p>The Hazelmere facility is authorized for the acceptance, processing and temporary storage of treated power poles through a previous amendment issued 24 September 2020. The licence amendment approved a capacity of 3,500T per annum for treated power poles. The amendment application seeks to increase the capacity to 15,000 tonnes per annum for treated power poles given stated increase in demand for the acceptance, processing and temporary storage of treated power poles.</p> <p>The application also seeks to remove the requirement for sorted recyclable and non-recyclable wastes to be stored in skip bins pending disposal offsite. The Proponent states recyclable wastes are already stored in segregated bunkers within the C&I facility (see Attachment 2), removing the requirement for separate skip bins.</p>
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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
Category 61A: Solid waste facility	50,000 tonnes per annual period	Change from authorised acceptance, storage and processing (shearing) of 3,500 tonnes of power poles to 15,000 tonnes per annual period.
62: Solid Waste Depot	50,000 tonnes per annual period	Dry commercial and industrial waste materials authorised for storage within undercover storage bays as well as within skip bins.

Legislative context and other approvals

<p>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?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/></p>
<p>Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Ministerial statement No: EPA Report No:</p>
<p>Has the proposal been referred and/or assessed under the EPBC Act?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Reference No:</p>
<p>Has the applicant demonstrated occupancy (proof of occupier status)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:</p>

Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Approval: Expiry date: If N/A explain why?
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 Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Regional office:
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: P1 / P2 / P3 / 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 type="checkbox"/>
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 checked="" type="checkbox"/> No <input type="checkbox"/>	Environmental Protection (Controlled Waste) Regulations 2004\ Licence Holder has provided correspondence with Controlled Waste Branch showing what requirements will be needed
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Classification: Lot 100 is classified as 'decontaminated'.</p>
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