Government of Western Australia
Department of Water and Environmental Regulation

# Amendment Report

## Application for Licence Amendment

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

| | |
|---|---|
| **Licence Number** | L9159/2018/2 |
| **Licence Holder** | City of Cockburn |
| **File Number** | DER2018/001433 |
| **Premises** | Henderson Waste Recovery Park<br>920 Rockingham Road<br>WATTLEUP WA 6166<br><br>Legal description –<br>Lot 202 on Deposited plan 60443,<br><br>Lot 2 on Diagram 17988, and<br><br>Lot 235 on Deposited Plan 226117 |
| **Date of Report** | 28 January 2025 |
| **Decision** | Revised licence granted |

Melissa Chamberlain

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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 L9159/2018/2 is held by the City of Cockburn (licence holder) for the Henderson Waste Recovery Park (the premises), located at 920 Rockingham Road, Wattleup.

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 construction and operation of the premises. As a result of this assessment, Revised Licence L9159/2018/2 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 Application summary

On 23 May 2024, the licence holder submitted an application to the department to amend licence L9159/2018/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Construction of two additional leachate evaporation ponds.
- Relocation of the waste transfer station from Cells 4 and 5 to the southern portion of the site.

### 2.2.1 Leachate management

The site has historically accumulated leachate over an extended period, prompting the need for additional storage and evaporation capacity to supplement the two existing leachate ponds. The proposed new ponds (Pond C and Pond D) will provide an additional 116,489 m³ of storage, significantly increasing the current capacity of 14,000 m³.

The sizing of the two new leachate ponds has been determined by the immediate need for leachate management rather than forecasted generation volumes. The design maximizes the capacity of both ponds based on available space and achievable depth. Currently, the focus is on constructing the larger pond (Pond C) to assess its impact on site leachate management. If additional capacity is required, the second pond (Pond D) will be constructed.

Theoretical calculations and leachate level assessments across the seven landfill cells estimate that removal of approximately 65,000 m³ of leachate would lower the levels to 500 mm below the overflow points of each cell. To achieve a predicted reduction of 1 meter below overflow, an estimated 78,000 m³ of leachate would need to be extracted. It is estimated that a total removal of 100,000 m³ would bring leachate levels to 2 meters below overflow across all cells.

Estimating potential leachate volumes in landfill cells relies on assumptions about drainage design, waste types, and the waste's water retention and release properties. These estimates are approximate and may vary significantly between cells and from actual pumpable volumes, serving mainly to indicate the scale of the issue and required solutions. These estimates provide a general indication of the problem's scale and the scope of potential solutions, which informed the decision to design two additional ponds to the maximum capacity possible within the site's existing constraints.

### 2.2.2 Waste transfer station

In June 2024, the licence holder was granted a licence amendment allowing the recommencement of landfilling in partially filled Cells 4 and 5. Consequently, the temporary waste transfer station currently located atop these cells needs to be relocated to maximise access to the available airspace. Although the City of Cockburn's long-term intention is to construct a permanent community waste sorting and transfer station on site, this amendment application specifically seeks approval for a new facility that, although temporary, represents an improvement over the existing transfer station in terms of environmental controls and operational outcomes.

Due to uncertainties regarding the necessity of Pond D and space constraints on site, the City of Cockburn has requested flexibility in the exact location of the new waste transfer station, limiting its potential siting to the southern portion of the premises.

The new temporary waste sorting and transfer station will be designed to enhance efficiency and safety compared to the current facility. It will primarily feature mobile receptacles and waste bins that can be repositioned as needed, along with some fixed infrastructure for operational efficiency and environmental protection, including:

- A road base surface with access roads.
- A transportable gatehouse at the facility entrance.
- Individual concrete slabs for seven large recyclable material bins to facilitate easy lifting and replacement without damaging the floor.
- Two concrete hardstand areas for receiving general waste, equipped with upstand concrete push walls for efficient waste handling.
- A bunded concrete slab for the waste oil storage tank to contain any spills (designed to hold 110% of the largest interconnected container or 25% of the total container volume, whichever is greater).
- A 1.8-meter mesh fence surrounding the facility to control access and minimise litter.

# 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 construction and operation which have been considered in this Amendment Report are detailed in Table 1. 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 | Proposed controls |
|---|---|---|---|
| Dust | Construction works including excavation and operation of heavy machinery | Air/windborne pathway | • Care during handling of soil material – excavation, haulage, unloading, stockpile management, loading from stockpile, haulage, unloading and spreading<br>• Low vehicle speeds<br>• Dust suppression via wetting down where necessary<br>• Control/cease dusty operations when weather conditions are adverse<br>• Physical separation distance between premises and the nearest receptors |
| Noise | | | • Low vehicle speeds<br>• Low frequency “croaker” type reversing beacons<br>• Appropriate maintenance of all plant and equipment<br>• Care during waste handling (bin banging)<br>• Physical separation distance between premises and the nearest receptors |
| Leachate or contaminated stormwater | Collection, transfer, storage and management of leachate generated by landfill cells | Seepage to soils and groundwater | • The ponds are designed with a combination GCL and 2.0 mm HDPE synthetic liner.<br>• Minimum 6m separation distance between the pond sumps and groundwater.<br>• A minimum of 500 mm of freeboard will be maintained to prevent unintended overflow of water from storm events (1 in 20 year, plus the storage resulting from a 90 percent (9-Decile) wet season).<br>• Increased number of forced evaporation units from eight to twelve. |
| | Leachate, spills or contaminated stormwater from the waste stored at the sorting and transfer station | | • Individual concrete slabs for large recyclable material bins to facilitate easy lifting and replacement without damaging the floor.<br>• Two concrete hardstand areas for receiving general waste, equipped with upstand concrete push walls for efficient waste handling.<br>• A bunded concrete slab for the waste oil storage tank to contain any spills (designed to hold 110% of the largest interconnected container or 25% of the total container volume, whichever is greater). |
| Windblown waste/litter | Operation of relocated transfer station including the acceptance, storage, and movement of waste material | Air/windborne pathway | • A 1.8-meter mesh fence surrounding the facility to control access and minimise litter.<br>• Lidded storage containers<br>• Regular removal of litter-generating materials<br>• Regular litter collection on site and in neighbouring properties |
| Odour | | | • Rapid removal of odourous waste materials.<br>• Rejection of/or cease accepting problematic waste types<br>• Slow pumping into leachate ponds<br>• Physical separation distance between premises and the nearest receptors |
| Dust | | | No additional controls proposed. |

| Emission | Sources | Potential pathways | Proposed controls |
|---|---|---|---|
| Fire/Smoke | Fire event during transfer station operations – on-site and off-site fires | | • Minimal ignition sources<br>• Small amount of stockpiled flammable materials<br>• Rapid extinguishing of fires<br>• Available water supply and firefighting equipment<br>• Close proximity to fire brigade |
| Fire wash water | | Seepage to soils and groundwater | • Minimal firefighting water as there is minimal flammable materials – most fire would be extinguished by handheld fire extinguishers<br>• Hardstands and concrete slabs for waste storage areas |

### 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**

| Human receptors | Distance from prescribed activity |
|---|---|
| Residential premises | Closest residential premises is approx. 25 m northeast from premises boundary. |
| Commercial premises | Closest commercial premises is approx. 20 m north of the premises boundary. |
| **Environmental receptors** | **Distance from prescribed activity** |
| Groundwater | Groundwater beneath the premises has been observed at depths between 7 and 18 metres below ground level (mbgl). Relative standing water level ranged from 0.48 to 1.1 m AHD. Cell 4 and 5 sump inverts have been measured to be at relative level 2.2 m with a distance of 1.1 m to groundwater.<br>The Superficial aquifer in this location consists of Tamala Limestone with the base of the aquifer found between 27 to 35 mbgl. |
| Beneficial users of groundwater | Local groundwater flow direction is inferred to be in a south-west direction.<br>Twelve in-force groundwater abstraction licences are located within a 500 m radius of the premises with abstraction solely from the Perth-Superficial aquifer. Uses for abstracted groundwater include irrigation for market gardening and turf farming, dust suppression for industrial purposes and domestic use. |
| RIWI Act Groundwater Area | The premises is within the proclaimed Cockburn Groundwater Area. |
| Bush Forever Site 346 | Approx. 150 m west of premises boundary. |

| | |
|---|---|
| Threatened and Priority Ecological Communities (TEC/PEC) | Several located within 200m of premises boundary. |
| Threatened Fauna | Identified surrounding the premises indicating that native vegetation may be providing habitat. |
| DBCA Legislated Tenure | Conservation Park located approx. 200 m west of the premises boundary. |
| Regional Parks | Beeliar Regional Park located approx. 150 m west of the premises boundary. |
| Geomorphic Wetlands - Swan Coastal Plain (Management) | Brownman Swamp – Approx. 320 m west of the premises boundary.<br>Lake Mount Brown – Approx. 525 m south-west of the premises boundary. |

## 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 L9159/2018/2 that accompanies this amendment report authorises emissions associated with the operation of the premises i.e. landfilling and operation of the waste transfer station.

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 construction and 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** | | | | |
| **Construction** | | | | | | | | |
| Construction of transfer station, leachate ponds and associated infrastructure including land excavation and operation of heavy machinery | Dust | **Pathway**: Air/windborne<br>**Impacts**: health and amenity | Residential and commercial premises (closest ~20m from premises boundary) | Refer to Section 5.1 | C = Minor<br>L = Rare<br>**Low Risk** | Y | Condition 21 - Visible dust prevention | The delegated officer considers these emissions to be adequately managed by existing licence conditions and general provisions of the EP Act and subsidiary regulations. |
| | Noise | | | | C = Minor<br>L = Rare<br>**Low Risk** | Y | N/A | |
| **Operation** | | | | | | | | |
| Operation of relocated transfer station by site staff and/or members of the public, including the acceptance, storage, and movement of waste material. | Noise | **Pathway**: Air/windborne<br>**Impacts**: amenity | Residential and commercial premises (closest ~20m from premises boundary) | Refer to Section 5.1 | C = Minor<br>L = Unlikely<br>**Medium Risk** | Y | Conditions 13 and 14 – Waste acceptance<br>Condition 15 – Waste processing | The delegated officer considers these emissions to be adequately managed by existing licence conditions and general provisions of the EP Act and subsidiary regulations. |
| | Odour | | | | C = Minor<br>L = Possible<br>**Low Risk** | Y | Condition 23 - Odour management | |
| | Fire and smoke | **Pathway**: Air/windborne<br>**Impacts**: health and amenity | | | C = Moderate<br>L = Rare<br>**Medium Risk** | Y | Conditions 13 and 14 – Waste acceptance<br>Condition 15 – Waste processing<br>Conditions 16 and 17 – Containment infrastructure<br>Condition 18 – Site security<br>Condition 20 – No waste burning | |
| | Asbestos | | | | C = Severe<br>L = Rare<br>**High Risk** | Y | Conditions 13 and 14 – Waste acceptance<br>Condition 15 – Waste processing<br>Condition 22 – No waste excavation<br>Condition 32 – Cover requirements<br>Condition 36 – Special waste register | |
| | Dust | | | | C = Minor<br>L = Unlikely<br>**Medium Risk** | Y | Conditions 13 and 14 – Waste acceptance<br>Condition 15 – Waste processing<br>Condition 21 - Visible dust prevention | |
| | Litter/windblown waste | **Pathway**: Air/windborne<br>**Impacts**: reduced amenity and degradation of vegetation | | | C = Minor<br>L = Unlikely<br>**Medium Risk** | Y | Condition 24 – Windblown waste management | |
| | Contaminated stormwater containing elevated levels of nutrients or contaminants | **Pathway**: Direct spill or run-off into soil, surface waters and/or groundwater<br>**Impacts**: impacts of degraded soil and reduced water quality on associated ecosystems | Geomorphic wetlands – closest located ~ 320 m west (downgradient) of the premises boundary<br>Threatened/priority ecological community buffers and threatened fauna surrounding the premises<br>DBCA land tenure located ~200m west of the premises boundary<br>Beneficial users of the underlying groundwater within Cockburn Groundwater Area | | C = Minor<br>L = Unlikely<br>**Medium Risk** | Y | Conditions 1 and 2 – Infrastructure construction requirements<br>**<u>Condition 12 – Leachate Management</u>**<br>Conditions 13 and 14 – Waste acceptance<br>Condition 15 – Waste processing<br>Condition 17 – Containment infrastructure<br>Condition 28 – Spill management<br>Condition 30 and 31 – Ambient groundwater monitoring | Licence holder's proposed controls implemented on the licence.<br>An update on leachate management at the premises following construction of each pond (Condition 12) is considered necessary for reporting and records requirements. |
| | Hydrocarbon/ hazardous waste spills or fire washwaters | | | | C = Moderate<br>L = Rare<br>**Medium Risk** | Y | | |

| Risk Event | | | | | Risk rating[1]<br>C = consequence<br>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** | | | | |
| The collection, transfer, and management of landfill leachate through forced evaporation units and evaporation ponds. | Leachate or contaminated stormwater containing elevated levels of nutrients and contaminants | **Pathway:** Overtopping, spray drift or failure of pollution control infrastructure resulting in surface water runoff<br>**Impacts**: impacts of degraded soil and reduced water quality on associated ecosystems | Geomorphic wetlands – closest located ~ 320 m west (downgradient) of the premises boundary<br>Threatened/priority ecological community buffers and threatened fauna surrounding the premises<br>DBCA land tenure located ~200m west of the premises boundary<br>Beneficial users of the underlying groundwater within Cockburn Groundwater Area | Refer to Section 5.1 | C = Moderate<br>L = Possible<br>**Medium Risk** | N | **Conditions 1 and 2 – Infrastructure construction requirements**<br>**Condition 3 and 4 – Additional groundwater monitoring wells**<br>**Conditions 5, 6, 7, 8, 9, 10 – Construction compliance reporting**<br>**Condition 11 – Operation of new ponds**<br>**Condition 12 – Hydrogeological report**<br>Conditions 13 and 14 – Waste acceptance<br>Condition 15 – Waste processing<br>Condition 17 – Containment infrastructure<br>**Condition 30 and 31 – Ambient groundwater monitoring (expanded parameters)** | Refer to Section 3.3 |

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.

## 3.3 Detailed risk assessment for leachate management

### 3.3.1 Current leachate management practices

Current on-site leachate management includes two HDPE-lined evaporation ponds (Ponds A and B) equipped with perimeter sprays and forced evaporation units to enhance evaporation. The licence holder has also used leachate recirculation through irrigation and injection wells in active cells, though this is only a short-term measure. It is assumed that waste around the wells can no longer absorb moisture, causing leachate to return to collection sumps. Thus, leachate injection merely delays accumulation in the evaporation ponds without effectively reducing leachate volumes at the site. Constructing additional evaporation ponds is expected to improve long-term leachate management at the facility.

City of Cockburn are currently working with DWER's Contaminated Sites Branch (CBS) to manage any obligations under the *Contaminated Sites Act 2003*. CSB have advised that further investigations are underway to assess groundwater impacts and potential risks from landfill gas, surface water, and sediment contamination on and off-site. As a result, a cluster of groundwater wells down-gradient were installed to track contaminants toward Lake Mount Brown, with initial results indicating no risk to off-site receptors. Immediate action is focused on controlling leachate through new leachate ponds, as outlined in this proposed amendment.

CSB deemed the current suite of monitored substances in groundwater to be adequate for assessing potential offsite leachate contamination impacts. However, they recommend adding bicarbonate ions, sulfate ions, dissolved organic carbon, and dissolved methane to improve tracing of potential groundwater contamination spread in the aquifer.

### 3.3.2 Technical advice on groundwater monitoring

Advice was sought from DWER's Regional Hydrogeologists and Contaminated Sites Branch, who reported that analysis of the department's monitoring network indicates a consistent westward groundwater flow in the Superficial aquifer throughout the year. This flow direction is supported by water level data from monitoring bores at the landfill after both summer 2024 and winter 2023. However, recent groundwater monitoring at the site shows that deeper bores in the aquifer exhibit a more south-westerly flow compared to intermediate and shallow bores.

The specialists further advised that the existing monitoring bore network around the site is inadequate for accurately assessing groundwater contamination. In summer 2024, levels of ammonia, chloride, and nitrate exceeding DWER's 2021 Non-Potable Use Guidelines were recorded at all but one monitoring location, including bore MW08D, situated outside the western boundary. Historical highs of total nitrogen (200 mg/L) and nitrate (210 mg/L) were also noted at MW07I following summer 2024. Due to the lack of monitoring bores southwest of MW08 and MW07, it remains uncertain how far the contamination plume extends in that direction.

To improve monitoring capabilities, additional bores are recommended west and southwest of MW07, MW08, and MW09. Further bores may be necessary if additional contamination is detected. Expanded monitoring northeast of MW10 is also advised, where ammonia and chloride levels exceeded guidelines. Furthermore, new groundwater monitoring bores should be installed south and west of the proposed leachate ponds, with a hydrogeological consultant determining precise locations and depths. Ideally, baseline groundwater data should be collected before constructing the leachate ponds, although it is acknowledged that the urgent nature of these leachate management upgrades may make this challenging.

### 3.3.3 Key findings

**The delegated officer has reviewed the information relating to leachate has determined the following:**

1. The proposed additional leachate ponds will significantly reduce the risks associated with leachate seepage from landfill cells and greatly enhance the licence holder's capacity to manage leachate volumes.
2. However, technical advice from the department's Hydrogeologists indicates that the existing monitoring bore network at the site is likely inadequate for accurately assessing groundwater contamination, based on the currently available information. The current contamination plume has not been fully characterised, and further information on its extent is required before additional monitoring requirements can be determined. This additional information may become available throughout the licence holder's ongoing obligations under the *CS Act*.
3. Given the time-sensitive nature of the proposed amendments and the urgency of improvements to on-site leachate management, the delegated officer has decided against delaying the approval to begin construction while awaiting further technical investigations to determine necessary additional groundwater monitoring.
4. Consequently, the delegated officer requires the City of Cockburn to engage a suitably qualified Hydrogeological consultant to conduct a comprehensive assessment. This assessment must characterise the spatial distribution of the existing groundwater contamination and evaluate the adequacy of the current monitoring network.
5. Should the assessment conclude that additional monitoring bores are necessary, the delegated officer considers their inclusion in the monitoring suite to be essential to effectively detect any further leachate emissions and determine necessary contamination mitigation or remediation actions.

# 4. Consultation

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

**Table 4: Consultation**

| Consultation method | Comments received | Department response |
|---|---|---|
| Licence holder was provided with draft amendment on 20/11/2024 (DWERDT1041096). | Comments were received on 26/11/2024 (A2328601) and revised comments received on 12/12/2024 (DWERDT1051700).<br>Refer to Appendix 1. | Refer to Appendix 1. |

# 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 |
|---|---|
| Conditions 1, 2, 3 4, 5, 6, 7, 8, 9, 10 and 11 | Inclusion of new conditions relating to the construction and operation of new infrastructure and necessary compliance reporting. |
| Condition 12 | Inclusion of a condition requiring the preparation of a comprehensive assessment of groundwater monitoring suite and possible additional monitoring requirements, as recommended by internal technical advice from CSB. |
| Condition 17 | Changes to containment infrastructure table to reflect infrastructure upgrades. |
| Condition 29 | Changes to process monitoring table to include additional ponds. |
| Condition 30 | Inclusion of additional monitoring requirements in groundwater monitoring. |
| Schedule 1: Maps | Inclusion of additional maps and plans |
| Schedule 3: Leachate Pond CQA requirements | Inclusion of detailed CQA requirements for pond liners. |

# References


1. Department of Environmental Regulation (DER), July 2015. *Guidance Statement: Regulatory principles*. Perth, Western Australia. Accessed at www.wa.gov.au
2. DER, October 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia. Accessed at www.wa.gov.au
3. DWER, June 2019. *Guideline: Decision Making*. Perth, Western Australia. Accessed at www.wa.gov.au
4. DWER, June 2019. *Guideline: Industry Regulation Guide to Licensing*. Perth, Western Australia. Accessed at www.wa.gov.au
5. DWER, December 2020, *Guideline: Environmental Siting*, Perth, Western Australia. Accessed at www.wa.gov.au
6. DWER, December 2020, *Guideline: Risk Assessments*, Perth, Western Australia. Accessed at www.wa.gov.au
7. DWER 2021, *Guideline: Assessment and management of contaminated sites*, Perth, Western Australia. Accessed at www.wa.gov.au

# Appendix 1: Summary of licence holder's comments on risk assessment and draft conditions

| Condition/Table | Summary of licence holder's comment | Department's response |
|---|---|---|
| Condition 1, Table 1, 1 | Noting that oil will be stored in a self-bunded, double walled oil storage tank (not on a concrete hardstand, indicated by updated transfer station figure provided). | The Delegated Officer notes that storage of waste oil in a self-bunded, double walled oil storage tank should sufficiently contain any leakage and therefore has removed the requirement for the oil storage concrete hardstand from Table 1. This requirement has been added to Table 6 with a requirement for sizing of interconnected containers.<br><br>The licence holder has also indicated concrete hardstands in the provided updated transfer station figure for construction and demolition waste, green waste, steel, white goods and mattresses. These have been added to Table 1. |
| Condition 2, Table 2, 2(b) | Request to include reference to installation of the geosynthetic clay liner. | The delegated officer accepts this request and has included reference to the geosynthetic clay liner installation. |
| Condition 8(a) | Remove reference to "person" as it is not in accordance with the definition. | The delegated officer considers this a typographical error and has removed reference to "person" in this condition. |
| Condition 15, Table 6, 3(a) | Updated premises map showing new green waste area provided. | Schedule 1, Figure 3 has been updated with this new premises map. |
| Condition 15, Table 6, 12(c) | As per an existing condition, the Licence holder confirmed that all hazardous wastes (other than fire extinguishers and gas bottles) are stored on a sealed hardstand area on separate shelves, and in secondary containers (e.g. chemical resistant plastic tubs or trays). | Condition remains unchanged. |
| Condition 15, Table 6, 12(d) | As per an existing condition, the Licence holder confirmed that flammable liquids, toxic substances, corrosive substances, oxidising agents and miscellaneous dangerous goods (household chemicals and unknown liquids) are stored within impermeable dangerous goods containers located on a sealed hardstand. | Condition remains unchanged. |

| Condition/Table | Summary of licence holder's comment | Department's response |
|---|---|---|
| Condition 15, Table 6, 13(a) | As per an existing condition, the Licence holder confirmed that all e-waste cages are stored on bunded pallets. | Condition remains unchanged. |
| Condition 17, Table 8, 2. | Updated premises map showing location of leachate evaporation units provided. Licence holder confirmed that these units are placed on bunded HDPE liner with an overflow into Pond A. | Schedule 1, Figure 3 has been updated with this new premises map. Condition included to ensure evaporation units are positioned on bunded HDPE liner with overflow contained and directed into a leachate pond. |
| Condition 17, Table 8, 3(b) | Licence holder noted that there are seven recyclable material bins, not six. | Number of bins adjusted accordingly. |
| Condition 17, Table 8, 3 | Licence holder notes that oil will be stored in a self-bunded double walled oil storage tank. | Condition updated to include reference to the oil storage tank being self-bunded and double walled. |
| Condition 17, Table 8, 3(c) | The licence holder has confirmed that green waste is stored on a concrete hardstand. | Condition added accordingly. |