



## Application for Licence Amendment

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

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<b>Licence Number</b>	L9168/2018/1
<b>Licence Holder</b>	Cleanaway Pty Ltd
<b>ACN</b>	000 164 938
<b>File Number</b>	DER2018/001360
<b>Premises</b>	Manjimup Transfer Station 9 Gandy Street, MANJIMUP 6258 Legal description - Lot 792 on Deposited Plan 218376 Certificate of Title Volume 2070 Folio 468 As defined by the Premises Map in Appendix 1
<b>Date of Report</b>	30 October 2022
<b>Decision</b>	Revised licence granted

**STEPHEN CHECKER**  
**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 L9168/2018/1 is held by the Cleanaway Pty Ltd (Licence Holder) for the Manjimup Transfer Station (the Premises), located at Lot 792 on Deposited Plan 218376 Gandy Street, MANJIMUP 6258.

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 L9168/2018/1 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.

## 2. Scope of assessment

### 2.1 Regulatory framework

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

### 2.2 Amendment summary

On 23 July 2022, the Licence Holder submitted an application to the department to amend Licence L9168/2018/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

A licence amendment is sought to change the current onsite putrescible waste holding period from 3 days (72 hours) to 10 days to align with operational activities. Paper and cardboards are only putrescible waste accepted at the facility.

No changes to other aspects of the existing Licence relating to Category 62 have been requested by the Licence Holder.

In consolidating the Licence, the CEO has:

- updated the format and appearance of the Licence; and
- corrected clerical mistakes and unintentional errors.

The full consolidation of Licence conditions as they relate to this Revised Licence are detailed in Section 5.1.

## 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.

Given that all the waste is stored in a sealed compactor unit, risks from the proposed extension in retention period is considered low.

### 3.1 Source-pathways and receptors

#### 3.1.1 Emissions and controls

The key changes to 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	Proposed controls
Odour	Screening processing of material vehicle movements	Air/windborne pathway	<ul style="list-style-type: none"> <li>Paper and cardboard are the only putrescible waste accepted at the facility which poses no risk of hazardous emissions or discharges.</li> <li>All waste is stored indoor in a sealed compactor unit.</li> </ul>
Noise			
Dust			

### 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	280m to the north, 860m to the south-east and 1200m to the west
Cemetery (public place)	105m to the east
Commercial/industrial premises	Adjacent to north, east, west and south
Environmental receptors	Distance from prescribed activity
Proclaimed surface water area under the Rights in Water and Irrigation Act 1914: - 'Warren River and Tributaries'	Premises mapped within this area
Public Drinking Water Source Area – proclaimed under the Country Areas Water Supply Act 1947: Donnelly River Water Reserve – Priority not assigned	825m to the west north-west (public drinking water source area)
Public Drinking Water Source Area – proclaimed under the Country Areas Water Supply Act 1947: Lefroy Brook Catchment Area – Priority not assigned	1,990m to the south-west (public drinking water source area)
Green Growth RSNAs DBCA Managed Miscellaneous Reserve	125m to the north-west: Lot 500 on Plan 52458, Crown Reserve R16437
Minor unnamed watercourses	290 m to the north-east (Non Perennial) 300m to the south, south-east (Non Perennial)
Underlying groundwater	Depth to groundwater unknown

## 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 L9168/2018/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. 62 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 operation**

Risk Event - Operation					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/ Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Acceptance storage and handling of waste  Vehicle movement and waste management activities	<b>Odour</b>	Air: amenity impacts	Residential - 280m to the north, 860m to the south-east and 1200m to the west  Commercial - Adjacent to north, east, west and south	Restrictions on waste accepted - Materials collections from kerb-side is accepted. Received at an enclosed shed. Waste stored in compactor unit.	C = Minor L= Possible Risk = Medium	Yes	Conditions 1 to 5	The Licence Holder's proposed controls were included on the Licence to reduce the impact of odour on sensitive receptors  Condition added to require containment structure either impervious or stored on an impervious hardstand base or floor.  Applicant should be able the meet the requirements for the Noise Regulations.
	<b>Dust</b>	Air amenity impacts	Residential - 280m to the north, 860m to the south-east and 1200m to the west  Commercial - Adjacent to north, east, west and south	All waste handling within enclosed shed. Inspection/housekeeping processes in place.	C = Minor L= Possible Risk = Medium	Yes	Condition 6	
	<b>Noise</b>	Air: health and amenity impacts	Residential - 280m to the north, 860m to the south-east and 1200m to the west  Commercial - Adjacent to north, east, west and south	All equipment is operated inside the enclosed shed and between the hours 8am to 5pm.	C = Minor L= Possible Risk = Medium	Yes	Conditions 1 to 5	

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.

## 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 (31 August 2022)	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: Consolidation of licence conditions in this amendment**

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Explanatory notes	Removed	Revised to current licensing format.
1 - 12	General Conditions	Conditions 1 -12	Revised to current licensing format.
N/A	Definitions Table 1	N/A	Revised as Table 6
Schedule 1: Maps	Premises map	Schedule 1: Maps	No change to Maps
Schedule 2	Premises boundary	N/A	No change

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

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

Condition	Summary of Licence Holder's comment	Department's response
	No comment	



## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY				
<b>Application type</b>				
Amendment to licence	Current licence number:	L9168/2018/1		
	Relevant works approval number:		N/A	<input type="checkbox"/>
Date application received	23/06/2022			
<b>Applicant and Premises details</b>				
Applicant name/s (full legal name/s)	Cleanaway Pty Ltd			
Premises name	Manjimup Transfer Station 9 Gandy Street, MANJIMUP 6258			
Premises location	Lot 792 on Deposited Plan 218376 Certificate of Title Volume 2070 Folio 468			
Local Government Authority	Shire of Manjimup			
<b>Application documents</b>				
HPCM file reference number:	DER2018/001360			
Key application documents (additional to application form):	Nil			
<b>Scope of application/assessment</b>				
Summary of proposed activities or changes to existing operations.	<p>Licence amendment</p> <p>Paper and cardboard are the only putrescible waste accepted at the facility.</p> <p>A revision of permitted time to store putrescible waste onsite is proposed, from 72 hours to 10 days, to align with site operational activities and offsite waste transfer schedules.</p> <p>Not considered to pose a risk of hazardous emission or discharges as all these materials are stored in a sealed compactor unit.</p>			
<b>Category number/s (activities that cause the premises to become prescribed premises)</b>				
<b>Table 1: Prescribed premises categories</b>				
Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity (amendments only)		
Category 62: Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use.	5,000 tonnes per annual period			

<b>Legislative context and other approvals</b>		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	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 type="checkbox"/> No <input checked="" type="checkbox"/>	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:
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:
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: South West
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Priority: P1 / P2 / P3 / N/A Are the proposed activities/landuse compatible with the PDWSA (refer to <u>WQPN 25</u> )?

		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</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i> )	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
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"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Classification: Date of classification: N/A