



Application for Licence Amendment

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

Licence Number	L9212/2019/1
Licence Holder	Washingtons Recycling Pty Ltd
ACN	154 319 847
Application Number	APP-0032463
Premises	Rock 'N Rubble Solutions 11 and 13 Keates Road ARMADALE WA 6112 Legal description – Lot 255 on Deposited Plan 57226 Certificate of Title Volume 2712 Folio 193 and Lot 254 on Deposited Plan 57226 Certificate of Title Volume 2712 Folio 192
Date of Report	3 February 2026
Decision	Revised licence granted

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1. Decision summary

Licence L9212/2019/1 is held by Washington’s Earthmoving Pty Ltd (Licence Holder) for the Rock ‘N Rubble Solutions (the Premises), located at 11 and 13 Keates Road, Armadale.

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 L9212/2019/1 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 17 November 2025, the Licence Holder submitted an application to the department to amend Licence L9212/2019/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The Licence Holder has sought to increase the annual throughput of the premises.

The amendments are being sought due to the Licence Holder experiencing significant growth in construction and demolition waste receivals in recent years and anticipates these will exceed 40,000 tonnes in the coming financial years. To avoid non-compliance and continue accepting building and demolition materials the Licence Holder has requested an increase in the licence limit to 100,000 tonnes across all categories.

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

Table 1: Proposed design or throughput capacity changes

Category	Current design throughput capacity	Proposed design throughput capacity	Description of proposed amendment
12	50,000 tonnes per annual period (combined total)	100,000 tonnes per annual period (combined total)	Increasing the combined throughput per annual period to 100,000 tonnes.
13			
62	50,000 tonnes per annual period	100,000 tonnes per annual period	Increasing the throughput per annual period to 100,000 tonnes.

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 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
Dust	Operation of crushing/screening equipment, processing of stockpiles of waste and operation of the sorting, unloading and loading of waste materials.	Air/windborne pathway	No additional controls proposed
Noise			No additional controls proposed
Contaminated Stormwater		Seepage to soils and groundwater and nearby vegetation	No additional controls proposed
Airborne asbestos fibres	Release of asbestos fibres from non-conforming waste accepted to the premises through unloading and crushing activities.	Air/windborne pathway	No additional controls proposed
Fire/smoke	Upset conditions (fire)	Air/windborne pathway	No additional controls proposed
Fire water	Upset conditions (fire)	Seepage through soil, transport groundwater and runoff pathway	No additional controls 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 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 (*Guideline: Environmental siting* (DWER 2020)).

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

Human receptors	Distance from prescribed activity
Residential premises	170 m east and 420 m west of the prescribed premises boundary
Industrial premises	Immediately adjacent to the premises boundary
Environmental receptors	Distance from prescribed activity
Native vegetation	440 m north east of the prescribed premises boundary
Underlying groundwater (non-potable purposes)	8-12 mbgl below the prescribed premises
Department of Biodiversity, Conservation and Attractions' Legislated Lands and Waters	440 m north east of the prescribed premises boundary
Priority Ecological Community	315 m north east of the prescribed 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 4.

The Revised Licence L9212/2019/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Crushing, Screening, and processing of laterite rock and construction and demolition (C&D) waste, with storage and sorting pending final disposal or re-use on site.

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 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/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Increased annual throughput with the operation of crushing/screening equipment, processing of stockpiles of waste and operation of the sorting, unloading and loading of waste material Vehicle movements	Dust	Air/windborne pathway causing impacts to health and amenity	Residences 170 m east and industrial premises located adjacent to the premises	Refer to Section 5.1	C = Moderate L = Possible Medium Risk	N	Condition 8, 16, 18, 19 20, 21, 22, 35 Condition 17	The Delegated officer notes the proximity of the premises to residential and industrial premises. The Delegated Officer considers dust risk to be possible due to the increased throughput of construction and demolition waste and storage. The Delegated Officer also notes that the department received a complaint in relation to dust in 2025. The Delegated Officer has added the requirements for waste stockpiles not to exceed 5 metres in height. Condition 3 also limits materials stored in storage bays to 3 metres in height.
	Noise	Air/windborne pathway causing impacts to health and amenity	Residences 170 m east and industrial premises located adjacent to the premises	Refer to Section 5.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 8, 31, 33, 35	The Delegated Officer is satisfied that the existing License conditions are sufficient to manage the risk of noise emissions. Noise monitoring was of the premises in full operation was undertaken in late 2019 and it was concluded that noise emissions from the premises comply with the requirements of the <i>Environmental Protection (Noise) Regulations 1997</i> at all times.
	Contaminated Stormwater	Seepage through soil, transport groundwater and runoff impacts contamination of land (soil)	Groundwater 8-12 mbgl Surrounding ecosystem and native vegetation	Refer to Section 5.1	C = Minor L = Rare Low Risk	N	Conditions 22 & 23	The Delegated officer notes the proximity of the premises to residential premises and environmental receptors. The Delegated Officer considers upset conditions to be possible due to the increased throughput of construction and demolition waste and storage.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								The Delegated Officer has added Spills management conditions to manage the potential risk from the increased throughput. Conditions 22 and 23 have been added to the licence to manage the potential spills risk.
Release of asbestos fibres from non-conforming waste accepted to the premises through unloading and crushing activities, with the increased annual throughput.	Airborne asbestos fibres	Air/windborne pathway causing impacts to health and amenity	Residences 170 m east and industrial premises located adjacent to the premises	Refer to Section 5.1	C = Severe L = Rare High Risk	Y	Condition 2, 3, 4, 5, 6, 7, 8, 10, 15, 16, 22-26.	The Delegated Officer is satisfied that the existing License conditions are sufficient to manage the risk asbestos fibres.
Fire/smoke	Toxic smoke/gas	Air/windborne pathway causing impacts to health and amenity	Residences 170 m east and industrial premises located adjacent to the premises	Refer to Section 5.1	C = Major L = Unlikely Medium Risk	N	Condition 8, <u>Conditions 22 & 23</u>	The Delegated officer notes the proximity of the premises to residential premises and environmental receptors. Conditions 22 and 23 have been added to the licence to ensure any hazardous, flammable liquid is immediately recovered.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	Fire water	Seepage through soil, transport groundwater and runoff impacts contamination of land (soil)	Groundwater 8-12 mbgl Surrounding ecosystem and native vegetation communities	Refer to Section 5.1	C = Moderate L = Unlikely Medium Risk	N	Condition 8:	The Delegated officer notes the proximity of the premises to residential premises and environmental receptors. The Delegated Officer is satisfied that firewater is unlikely to impact on receptors in most circumstances. Existing, and added conditions (22 and 23) should be sufficient to ensure that fire does not occur at the premises.

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

Table 5: Consultation

Consultation method	Comments received	Department response
Applicant was provided with draft documents on 6 January 2026.	Email received from the applicant on 30 January 2026 advising that they have no comments.	Noted

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

New condition	Previous licence condition	Revised licence condition	Proposed amendment summary
N/A	ACN: 112 655 099	ACN: 154 319 847	Reflecting correct ACN of the licence holder
N/A	Category 12: 50,000 tonnes per annual period (combined total with Category 13) Category 13: 50,000 tonnes per annual period (combined total with Category 12) Category 62: 50,000 tonnes per annual period	Category 12: 100,000 tonnes per annual period (combined total with Category 13) Category 13: 100,000 tonnes per annual period (combined total with Category 12) Category 62: 100,000 tonnes per annual period	Amendment to the annual throughput for the licence's categories: Cat 12, 13 and Cat 62 to increase the throughput to include:
N/A	N/A	N/A	Rewording of 'shall' to 'must' as per current licencing format
1. Table 1	Type of waste authorized to be accepted onto the premises	Waste acceptance	Rate at which waste is received amended to reflect increase of licence categories; A combined total of 100,000 tonnes per annual
Condition 8	Infrastructure and	Infrastructure and	Added additional information previously in

New condition	Previous licence condition	Revised licence condition	Proposed amendment summary
Table 3	equipment requirements	equipment requirements	<p>Schedule 1</p> <p>The following wording was removed from Row 2 because photographic evidence was provided to the department on 29 November 2019: <i>Not to be operated until photographic evidence of installation of the Crusher and fully functional associated pollution control equipment has been submitted to the CEO.</i></p>
Condition 18	N/A	<p>Condition 18:</p> <p>All Waste stockpiles and Product stockpiles should not exceed 5 m in height</p>	<p>Stockpile exceedance levels to manage increase throughput and dust/fire potential emissions risk</p>
Condition 22; Condition 23	N/A	<p>Condition 22:</p> <p>The licence holder must immediately recover, or remove and dispose of, spills of environmentally hazardous materials including fuel, oil, or other hydrocarbons, whether inside or outside and engineered containment system</p> <p>Condition 23:</p> <p>The licence holder must ensure that all material used for the recovery, removal, and/or disposal of environmentally hazardous materials is stored in an impermeable container prior to disposal at an appropriately authorised facility</p>	<p>Spills conditions added</p>
34. 35.	Record keeping	<p>Condition 34 & Condition 35</p>	<p>Record keeping condition updated to the current Department condition format</p>
N/A	Schedule 2: Primary Activities	Removed from licence	<p>Repetitive information already present on page 1 and page 3 of the licence deleted.</p>

New condition	Previous licence condition	Revised licence condition	Proposed amendment summary
N/A	Schedule 6: Asbestos fact sheet	Removed from licence	Outdated factsheet Available of DWER website and link provided in licence

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.