



Application for licence

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

Licence number	L9220/2019/1
Applicant	Community Resources Limited
ACN	622 913 384
DWER file number	DER2019/000470
Premises	Soft Landing Mattress Recycling 9 Opportunity Street WANGARA WA 6065 Being Part of Lot 539 on Deposited Plan 60104 Certificate of Title Volume 2703 Folio 272 As defined by the Premises map attached to the issued licence.
Date of report	11/12/2019
Decision	LICENCE GRANTED

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1. Definitions

Key terms relevant to this decision report and their associated definitions are listed in **Table 1**.

Table 1: Definitions

Term	Definition
Applicant	Community Resources Limited
Category / categories	Categories of prescribed premises as set out in Schedule 1 of the EP Regulations.
Condition	means a condition to which this Licence is subject under s.62 of the EP Act.
Decision Report	refers to this document.
Delegated Officer	An officer delegated under section 20 of the EP Act.
Department	The department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation As of 1 July 2017, the Department of Environment Regulation (DER), the Office of the Environmental Protection Authority (OEPA) and the Department of Water (DoW) amalgamated to form the Department of Water and Environmental Regulation (DWER). DWER was established under section 35 of the <i>Public Sector Management Act 1994</i> and is responsible for the administration of the <i>Environmental Protection Act 1986</i> along with other legislation.
Emission	has the same meaning given to that term under the EP Act.
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Fire wash-water	means water that, in the event of a fire, has been used to extinguish a fire and all materials and combustion products dissolved or suspended within such water and includes other fire suppressant substances such as foams.
Mattress and ensemble bed bases	means mattress and ensemble bed bases that comprise of textiles, foam, timber, metal and plastic materials.
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Prescribed premises	This has the same meaning given to that term under the EP Act.

Term	Definition
Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report
Risk Event	As described in <i>Guidance Statement: Risk Assessment</i>
White goods	means electrical goods such as fridges, freezers, washing machines and dryers that comprise of steel and plastic materials.

2. Purpose and scope of assessment

Soft Landing Mattress Recycling (the Applicant) have operated a mattress, ensemble bed base and white goods recycling facility since 2015. The Applicant recently relocated to a new Premises at 9 Opportunity Street, Wangara and holds a five year lease agreement with Markwood Investments Pty Ltd that is valid to 1 April 2024. The Applicant is proposing to install new machinery at the Premises that will increase the capacity of steel and foam consolidation for recycling. The proposed upgrade will increase their current throughput of waste so as to cause the Premises to meet the threshold limits for Prescribed Premises Category 61A as defined in Schedule 1 of the EP Regulations (see Table 3). This means the Applicant must hold a Part V EP Act Licence to authorise emissions and discharges to occur, and must comply with the conditions of that licence (sections 53 and 56 of the EP Act).

3. Application details

An Application for a Licence was submitted on 29 August 2019 for a Prescribed Premises Category 61A for the proposed upgrades to the existing site operations at the recycling facility.

The Applicant originally submitted an application for a works approval and Licence for the site operations. Clarification was sought from the Applicant in relation to the scope of the proposed construction works to determine whether a works approval or Licence instrument should be applied for. The Applicant provided additional information on 10 September 2019 confirming there are no construction works proposed only the installation of replacement machinery. The Delegated Officer therefore determined that the Applicant should submit an application for a Licence.

The Delegated Officer determined that additional information was required to validate the application. The Applicant was formally requested to provide additional information on 13 September 2019. The Applicant provided supporting documentation in response to this request on 4 October 2019.

Table 2 lists the documents submitted during the assessment process.

Table 2: Documents and information submitted during the assessment process

Document/information description	Date received
<i>Application Form and supporting information, Soft Landing Mattress Recycling, Community Resources Limited</i>	29 August 2019
Additional information – email (Revised Application form and information on scope of proposed works) <i>Clarification required – Soft Landing Mattress Recycling – Response,</i>	10 September 2019
Additional information – email (supporting documentation) <i>Clarification required – Soft Landing Mattress Recycling – Response, Alan Davenport</i>	4 October 2019

4. Overview of existing Premises

The Premises is located within an area zoned as 'General Industry' under the City of Wanneroo District Planning Scheme No. 2 and as such is surrounded by other industrial and commercial enterprises. The Premises includes the entire Lot that covers a total area of approximately 2423 m². An existing building that covers approximately 1469 m² is situated to the north of the site

that is used for the storage, manual processing and recycling of mattresses, ensemble bed bases and white good products.

The Premises currently accepts mattresses, ensemble bed bases and white goods products which are deconstructed and consolidated for dispatch to processors for manufacture into new products. Approximately 75% of mattress and bed ensemble materials in total are recycled and diverted from landfill.

The Applicant proposes to increase the annual throughput of mattress and white goods waste storage and recycling activities which will cause the Premises to be considered a prescribed premises under the EP Act for Category 61A as described in Table 3 below.

Table 3: Classification of premises and assessed design capacity

Category	Description	Assessed production or design capacity or throughput
61A	Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.	2,820 tonnes per annual period

5. Description of operations

5.1 Waste acceptance and storage

The Applicant proposes to undertake minor construction works which relate to the installation of new machinery, namely a steel baler and foam baler that will replace old machinery. This machinery will improve operations and increase the capacity of steel and foam consolidation for recycling at the Premises. The Applicant estimates that the increase in operations will result in the acceptance and reprocessing of a total of 2,820 tonnes of material per annual period comprising of 2,100 tonnes of mattresses/ensemble bed bases and 720 tonnes of white goods.

Stockpile sizes of mattresses and white goods stored at the facility at any one time are estimated to be 500 units and 50 units maximum respectively. Typically, 40 per cent (20 units) of the white goods accepted are refrigerant containing units (refrigerators). Mattress and white goods units are temporarily stored in stockpiles prior to processing which occurs within one day of collection. It is estimated that a maximum of 81 kilograms of refrigerant gases will be stored at the site at any one time. Refrigerant gases in refrigerant containing goods are approximately 110 grams per unit, hence approximately two kilograms of refrigerant is contained within appliances that are processed the next day.

5.2 Operational aspect

Mattress and ensemble bed base unit recycling process

Mattress and ensemble bed base units are unloaded at the Premises using a forklift and stacked onto pallets within an enclosed building. Units are sorted for processing according to waste type (bases and mattresses) and their composition. The pallets of units are placed onto roller racking and transferred from the intake area to the cutting area for processing. The textiles and foam of each mattress are manually cut and stripped by staff on a cutting bench. The foam from the mattresses is cut down to baler-size using saws and placed into a baler to be pressed and tied into bales. Ensemble bed bases are identified on the roller rack and diverted to the automated base splitter to separate steel from timber bases. The base splitter has a mechanical ram that moves across the interface of the steel and timber layer to detach the stapled steel layer. Spring

sets are separated and placed into the steel press where they are pressed into bales. Once materials have been consolidated, pressed and baled, they are dispatched to recyclers for manufacture into new products.

White goods recycling process

Once white goods units have been unloaded off a flatbed truck to the Premises using a forklift, they are sorted and transferred to processing stations by type and condition. Units are then assessed to determine whether they are suitable for refurbishment and resale or for recycling. Units that are considered to be suitable for refurbishment undertake further testing to determine if they are in safe working order for resale. Refrigerant-based units that are not suitable for refurbishment are recycled.

Licensed operators that hold a restricted Refrigerant Recovery licence degas the refrigerant-based units and store the gases in recovery cylinders at the Premises. Once the capacity of the refrigerant gases has been reached, gas is sold using a Refrigerant Trading authorisation. Any operations related to refrigerant recovery are carried out in accordance with the Applicant's Refrigerant trading authorisation certificate (Authorisation No. AU45327).

White goods that are proposed to be recycled are deconstructed and dismantled to remove some components of the units for higher order recycling (e.g. high value washer motors are removed for copper). Units are marked as deconstructed, unsaleable and degassed unsaleable refrigerant-based units and separated into scrap metal areas at the Premises. Scrap metal is recovered for recycling and residual materials are disposed of.

5.3 Infrastructure

The existing infrastructure and equipment at the Premises is outlined in Table 4 below and depicted in the site layout plans as shown in Figure 1 and Figure 2. The equipment specified in Rows 1 and 2 of Table 4 will be replaced with the new equipment specified in rows 12 and 13.

Table 4: Infrastructure and equipment

Ref	Existing Infrastructure or Equipment	Site Plan reference
1	Steel baler (being replaced – see new equipment to be installed)	Site Layout Plan in Figure 1
2	Foam balers x 3 (being replaced – see new equipment to be installed)	
3	Base separator	N/A
4	Gravity rollers or roller racking	
5	Cutting benches	
6	Forklifts and pallet jacks	Mobile equipment
7	Refrigerant gases from refrigerants stored in 3 x 27 kg bottles in a secured lockable unit	N/A
8	Refrigerant removal equipment including: <ul style="list-style-type: none"> Recovery units, piercing valves and manifold sets (for common domestic and commercial refrigerant system types R32, R1234yf, R134A, R22, R404A, R410A); Leak detector and charging scales; and Handling and processing equipment. 	Site Layout Plan in Figure 1

Ref	Existing Infrastructure or Equipment	Site Plan reference
9	Smoke alarms for smoke detection in office	Site Layout Plan in Figure 2
10	2 x fire extinguishers and hose reels	
11	Concrete underground blind sump (sealed and designed to contain)	
Ref	New equipment to be installed	Site Plan reference
12	Install new steel baler: <ul style="list-style-type: none"> • Pressure box size of 2000 x 1750 x 1000mm; • Bale size of 600 x 400 x 400mm; • Compaction force of 2,269kN; and • Working pressure of 25MPa. 	Site Layout Plan in Figure 1
13	Install new foam baler: <ul style="list-style-type: none"> • Bale size of 700 x 750 x 1100mm; • Compaction force of 325kN. 	

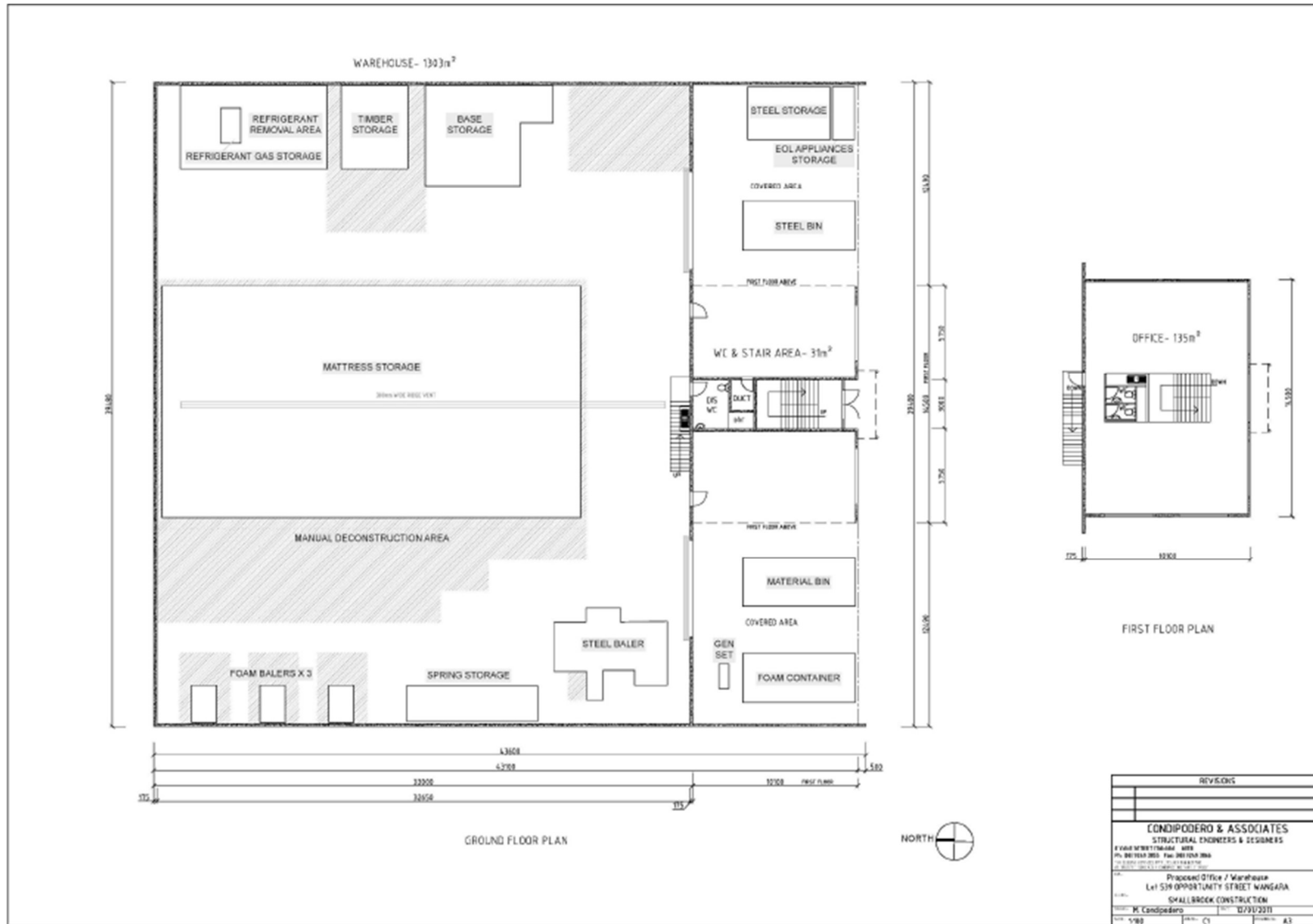


Figure 1: Site Layout Plan

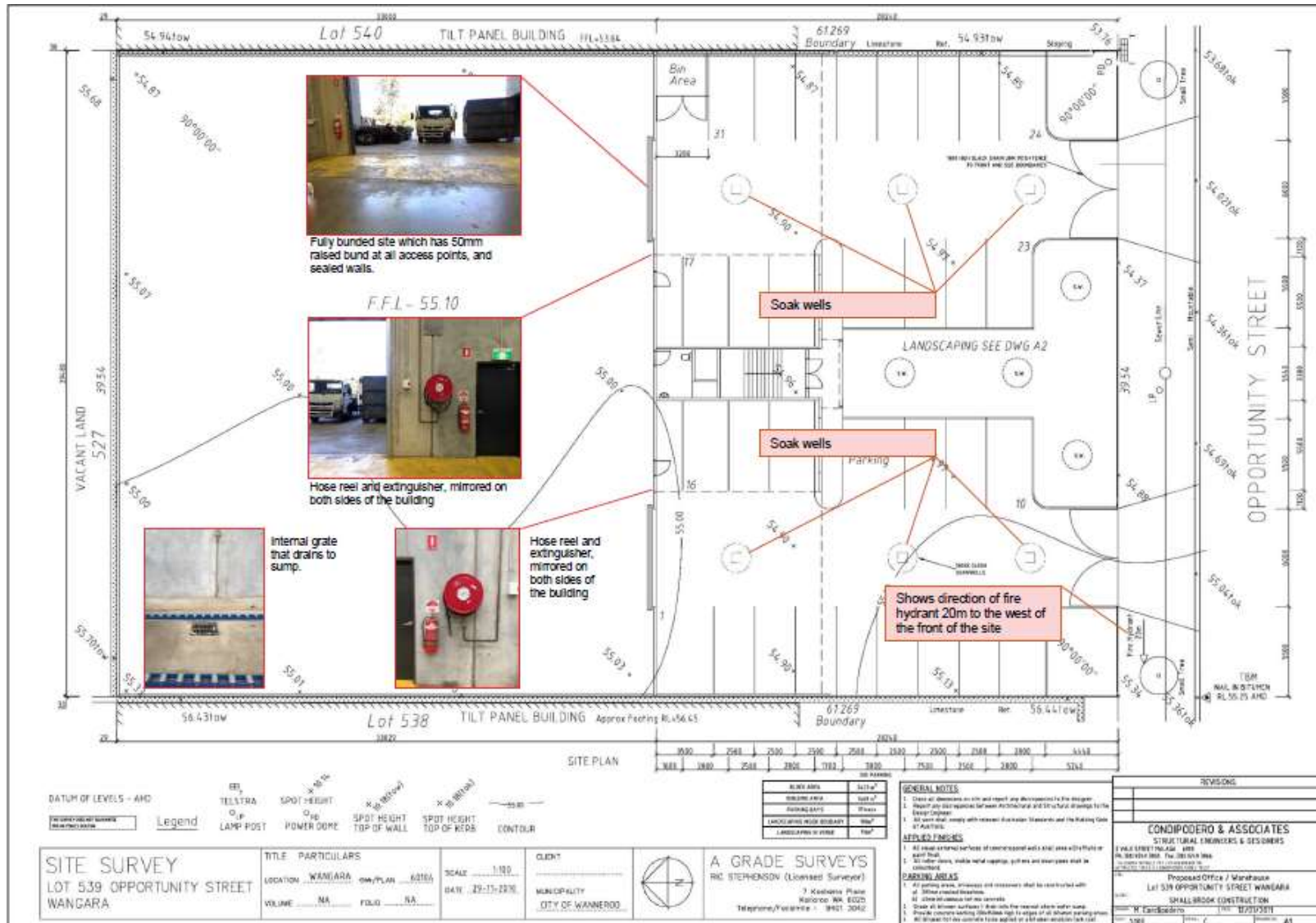


Figure 2: Site Layout Plan showing firefighting equipment

6. Legislative context and other approvals

6.1 Contaminated Sites

The Premises is not listed on DWER's contaminated sites database.

6.2 Other relevant approvals

The Premises is situated in an area zoned as 'General Industry'. Development approval is not required for the proposal given General Industrial activities are a permitted use in this area under the City of Wanneroo's District Town Planning Scheme No. 2.

7. Emission sources, receptors, pathways and controls

7.1 Emissions

The potential for emissions to impact on sensitive receptors has been assessed in accordance with the Department's Risk Framework. A risk assessment for the operation of the Premises has been included in this Decision Report. The key emissions which have been considered in this report are **dust, noise, fire washwater and fire smoke risk**.

The Applicant has proposed measures to assist in controlling these emissions, where necessary. The control measures are outlined in Section 7.4 below and have been considered when undertaking the risk assessment detailed in Section 8.

7.2 Potential receptors and environmental aspects

Risk is assessed as a combination of emission sources, the proximity and sensitivity of receptors to those emission sources and any pathways that can allow the emission to reach and potentially harm the receptor. Figure 3 and the table below provides a summary of human and environmental receptors in proximity to the premises which have a potential to be impacted from site activities, and the risk assessment in Section 8 considers these receptors in the context of emissions and potential pathways.

Table 5: Distance to receptors

Human receptors	Distance from activity or prescribed premises
Industrial premises (Polyair Airconditioning Products, Eidis Refrigeration, Metalflex Air Conditioning)	Directly adjacent to Premises (West, East and North)
Commercial Premises (Australian Outdoor Living, Bello Café, The Juicist)	Located approximately 20 metres north-east, 180 metres north-east and 180 metres west of the Premises boundary respectively.
City of Wanneroo (Wangara Recycling Centre) (L8403/2009/3) – Composting facility	Located approximately 85 metres south of the Premises boundary.
Residential premises (zoned urban development)	Located approximately 1330 metres south-west, 1430 metres north-west and 1550 metres south-east of the Premises boundary.

Environmental receptors	Distance from activity / prescribed premises
Rights in Water and Irrigation Act 1914 (RIWI) Wanneroo Groundwater Area	Premises is situated within the mapped proclaimed groundwater area.
'Banksia Dominated Woodlands of the Swan Coastal Plain IBRA Region' threatened ecological community (TEC).	The boundary of the closest mapped occurrence of the TEC is located approximately 310 metres north-east of the Premises boundary. Several occurrences of this TEC occur within two kilometres of the Premises boundary.
Mapped Bush Forever Site No. 327 known as the 'Badgerup Lake and adjacent bushland, Wanneroo'	Located approximately 354 metres north-west of the Premises boundary.
Mapped conservation category wetland (sumpland) known as the 'Little Badgerup Lake'	Located approximately 651 metres north-east of the Premises boundary.
Mapped multiple-use wetland (sumpland)	Located approximately 832 metres south-east of the Premises boundary.
Mapped Bush Forever Site No. 463 known as the 'Starlight Grove Bushland, Gngangara/Wangara Sydney Road'	Located approximately 864 metres north-east of the Premises boundary.

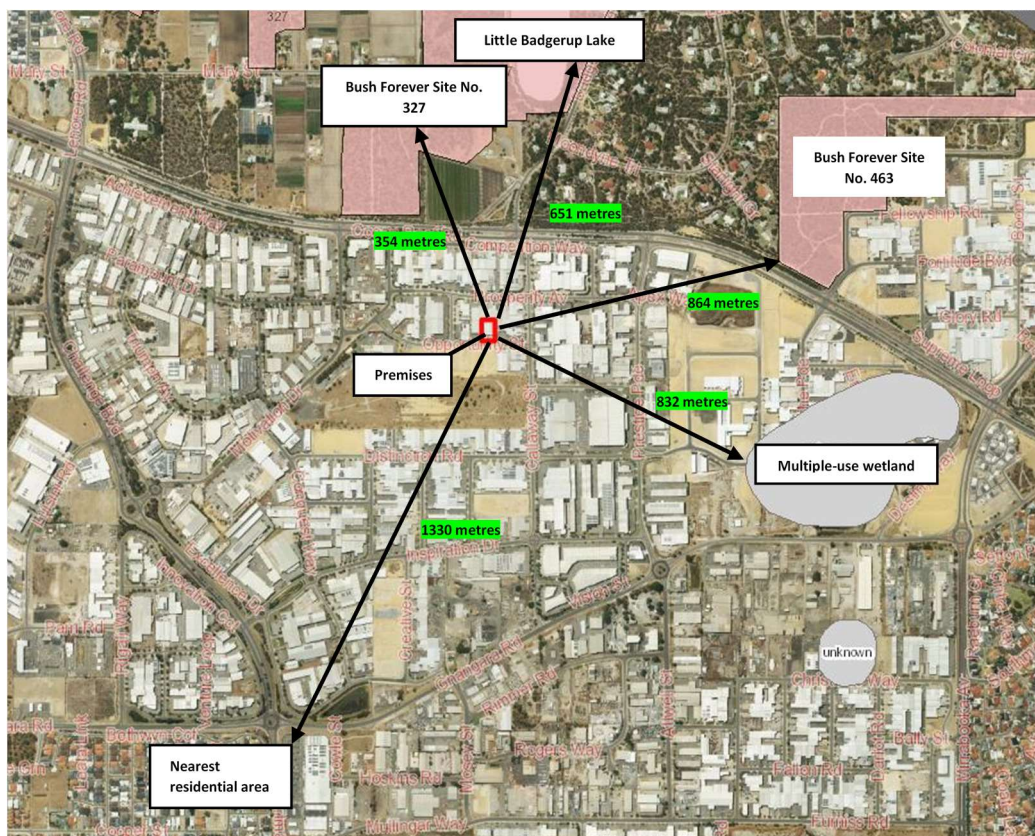


Figure 3: Premises siting - Distance to receptors

7.3 Pathways

7.3.1 Groundwater

As potentially contaminated wastewater from spillages and fire washwater in the event of a fire has the capacity to infiltrate groundwater, the hydrogeological context for the Premises have been considered. The surface geology has been identified as Bassendean sands, which provides a readily permeable pathway to groundwater.

Based on the Perth Groundwater Atlas, groundwater is considered to be flowing in a south westerly direction towards the 'Lake Goolelal' and 'Wallubuenup Swamp' wetland system located approximately 2.7 kilometres from the Premises. The depth from the Premises ground level to the water table is approximately 20 metres. Mapped groundwater salinity is classified as 'fresh' with a salinity level of 250-500 milligrams per litre total dissolved solids (TDS). The Premises is not located within a designated Public Drinking Water Source Area. Groundwater parameters are defined in information available in the Perth Groundwater Atlas (Department of Water, 2004; as updated from time to time).

7.3.2 Air

Noting that all machinery is maintained and operated inside a fully enclosed steel-structured building, the Delegated Officer considers that the risk of dust and noise emissions being generated at the Premises to be low. Given this, the prevailing wind direction has not been considered in this instance.

These pathways have been considered in the risk assessment table in Section 8.

7.4 Applicant controls

The Applicant has proposed the following management controls as part of the application:

Table 6: Summary of emissions and Applicant controls

Emission (as identified above)	Source/activities	Proposed controls
Dust	Vehicle movements Unloading, handling and storage of mattresses, ensemble bed bases and white goods. Mattress and ensemble bed base processing and mechanical breakdown of materials. Replacement of new equipment (steel press and baler).	All vehicle movements and unloading occurs on a concrete hardstand. All unloading and handling occurs inside the fully enclosed steel-structured building. The majority of the storage occurs inside the enclosed steel-building with the exception of four bins which are stored in an undercover area. Storage bins in the undercover area are contained to ensure dust emissions are controlled. All machinery is maintained and operated inside the fully enclosed steel-structured building. Mattress processing which involves the cutting and removal of textiles and foam, takes place within a fully enclosed steel-structured building.

Emission (as identified above)	Source/activities	Proposed controls
		The Premises will be cleaned daily by staff to remove settled dust.
Noise	<p>Vehicle movements</p> <p>Unloading and handling of mattresses, ensemble bed bases and white goods onto hardstand.</p> <p>Baling of spring sets and foam from mattresses.</p> <p>Mattress, ensemble bed base and white goods processing and mechanical breakdown of materials.</p>	<p>All machinery is maintained and operated inside the fully enclosed steel-structured building.</p> <p>All unloading and handling of mattresses, ensemble bed bases and white goods occurs inside the fully enclosed steel-structured building.</p> <p>The Premises only operates between 7:30am to 3:30pm Monday to Friday.</p>
Fire washwater	Fire event	<p>The fully enclosed steel-structured building contains a concrete hardstand with 50mm raised bund at all access points, and sealed walls.</p> <p>Fire washwater used within the building for fire suppression will be contained within the building and directed into a concrete drain that flows into a sealed blind concrete sump.</p> <p>There are no controls for fire washwater used outside the building. Fire washwater generated outside the building will flow into stormwater drains and soakwells.</p>
Spill incident risk	Storage and use of chemicals and oils such as cleaning agents and hydraulic fluids.	<p>The fully enclosed steel-structured building contains a concrete hardstand with 50mm raised bund at all access points, and sealed walls.</p> <p>Wastewater collected within the building is directed into a drain that flows into a blind concrete sump.</p> <p>Immediately clean-up of small diesel and hydraulic fluids spills using on-site spill kits.</p>
Smoke	<p>Fire event</p> <p>Large stockpiles of combustible recyclable and waste materials.</p> <p>Leakage of refrigerant gases due to inappropriate storage.</p>	<p>Size and separation distance of white goods and mattresses stockpile sizes stored at the Premises:</p> <p><u>White goods</u></p> <ul style="list-style-type: none"> • 50 units maximum are stored on site at any one time; • Typically 40% (20 units maximum) of units are refrigerant-containing units (refrigerators); • Separation distances are minimum one metre between other waste materials/structures; • Processing to capture refrigerants is

Emission (as identified above)	Source/activities	Proposed controls
		<p>within one day of collection.</p> <p><u>Mattresses</u></p> <ul style="list-style-type: none"> • 500 units maximum are stored on site at any one time; • 275 units average was recorded in FY19 stored at any one time; • Separation distances are minimum one metre between other waste materials/structures; and • Processing to dismantle mattresses and separate components is within one day of collection. <p>Equipment for firefighting is maintained on site to ensure fire/smoke emissions are controlled in the event of a fire which includes:</p> <ul style="list-style-type: none"> • fire extinguishers, fire hoses and fire blankets at the Premises; • smoke alarms for smoke detectors in on-site office; and • access for fire fighting vehicles. <p>A fire hydrant is located 20 metres to the west of the front of the site.</p> <p>Refrigerant gases are stored in accordance with Australian Guidelines AS404 in a secured lockable unit in a cool area away from direct heating and the risk of fire with appropriate signage to provide ready identification for emergency teams.</p>

8. Risk assessment

The identification of the sources, pathways and receptors to determine Risk Events are set out in Table 7 below, consistent with the *Guidance Statement: Risk Assessments*. Risk ratings have been assessed for each key emission source and take into account potential source-pathway-receptor linkages. The mitigation measures / controls proposed by the Licence Holder have been considered in determining the risk rating.

The conditions in the issued Licence as outlined in Table 7, have been determined in accordance with the *Guidance Statement: Setting Conditions*.

8.1 Risk assessment – operation

Table 7: Identification of emissions, pathway and receptors

Risk Event				Consequence rating ¹	Likelihood rating ¹	Risk ¹	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
<p>Vehicle movements</p> <p>Unloading, handling and storage of mattresses, ensemble bed bases and white goods.</p> <p>Mattress and ensemble bed base processing and mechanical breakdown of materials.</p> <p>Replacement of new equipment (steel press and baler)</p>	Dust	Air/windborne pathway causing impacts to health and amenity of closest human receptors being the adjacent light industrial/commercial premises.	As outlined in Section 7.4	Minor	Unlikely	Low	<p>As the installation of new equipment and the unloading, handling and storage of most materials occur within a fully enclosed steel-structured building, the potential for dust emissions to leave the building is significantly reduced.</p> <p>Slow vehicle movements on a concrete hardstand will not produce large quantities of dust.</p> <p>The processing of mattress recycling within a fully enclosed steel-structured building is considered to be adequate to mitigate dust emissions generated from operations.</p>	<p>Condition 2: Waste acceptance specifications</p> <p>Condition 3: Waste processing specifications</p> <p>Conditions 4 and 5: Infrastructure and equipment</p>
<p>Vehicle movements</p> <p>Unloading and handling of mattresses, ensemble bed bases and white goods onto hardstand.</p> <p>Baling of spring sets and foam from mattresses.</p> <p>Mattress, ensemble bed base and white goods processing and mechanical breakdown of materials.</p>	Noise	Air/windborne pathway causing impacts to health and amenity of closest human receptors being the adjacent industrial/commercial premises.	As outlined in Section 7.4	Minor	Unlikely	Low	<p>The Premises is surrounded by industrial and commercial enterprises within the Wangara Industrial Area. Noting that all machinery is maintained and operated within a fully enclosed steel-structured building and that hours of operation are restricted with processing activities not occurring before 7:30am, the Delegated Officer considers that the resulting impact to amenity will be low.</p>	<p>Conditions 4 and 5: Infrastructure and equipment</p> <p>All noise emissions from the premises are subject to the <i>Environmental Protection (Noise) Regulations 1997</i></p>
<p>Storage and use of chemicals and oils such as cleaning agents and hydraulic fluids</p>	Spill incident risk	Spill run-off and infiltration to soil and transport through groundwater to adjacent industrial premises. Contamination of groundwater and potential health impact at adjacent premises if extracting groundwater.	As outlined in section 7.4.	Minor	Rare	Low	<p>It is not anticipated that there will be a large volume of spills at the Premises, therefore the likelihood of impact occurring is reduced.</p>	<p>Condition 4: Infrastructure and equipment</p>

Risk Event				Consequence rating ¹	Likelihood rating ¹	Risk ¹	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
<p>Fire event</p> <p>Large stockpiles of combustible recyclable and waste materials.</p> <p>Leakage of refrigerant gases due to inappropriate storage.</p>	Smoke	Air/windborne pathway causing impacts to health and amenity of closest human receptors being the adjacent industrial/commercial premises.	As outlined in section 7.4.	Major	Rare	Medium	<p>The Delegated Officer considers that the Applicant's proposed controls as outlined in section 6.4 are adequate to prevent the risk of a fire. DFES have also provided comment on the activity – refer to comments in Section 9 (DFES have no objection to the proposal provided the measures outlined in the supporting documentation are adhered to).</p> <p>The maximum number of units to be stored on site at any one time has been specified in the conditions as a control for fire risk and this is consistent with the maximum storage proposed by the Applicant.</p>	Conditions 6 to 9: Fire management
Fire event	Fire washwater	<p>Fire washwater run-off and infiltration to soil and transport through groundwater to adjacent industrial premises.</p> <p>Contamination of groundwater and potential health impacts at adjacent premises if extracting groundwater.</p>	<p>As outlined in section 7.4.</p> <p>Limited details have been provided in relation to the management of fire washwater following a fire incident.</p>	Moderate	Rare	Medium	<p>The Delegated Officer has determined that a fire event is only likely to occur in rare circumstances.</p> <p>The primary storage area is within an enclosed building and comprises a concrete hardstand that is fully bunded and includes a blind concrete sump to collect and contain fire washwaters (to the extent of its capacity) in the event of a fire.</p>	Condition 10: Fire management

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Department's Guidance Statement: Risk Assessments (February 2017)

9. Consultation

Table 8: Summary of consultation

Method	Comments received	DWER response
Application advertised on DWER website (21/10/2019)	None received	N/A
Local Government Authority advised of proposal (22/10/2019)	On 8 November 2019, the City of Wanneroo (the City) advised that the proposal is consistent with the permitted uses within the 'General Industrial' zone of the City's District Planning Scheme No.2 and as such a development approval application is not required to be submitted unless external works are required.	N/A
Department of Fire and Emergency Services (DFES) advised of proposal (22/10/19)	On 24 October 2019, DFES advised that they have no objection to the proposal provided the measures outlined in the supporting documentation are adhered to.	N/A
Draft decision report and licence provided to Applicant (08/11/2019), comments received 5/12/19	<u>Licence: Condition 3 – Waste processing specifications</u> The Applicant confirmed that the storage for mattresses and ensemble bed bases is within the warehouse.	Condition 3 within the Licence has been updated accordingly.
	<u>Licence: Condition 4 - Infrastructure and equipment requirements</u> The Applicant advised that a dust proof cutting room has not been provisioned for the Premises and that the supporting information that was originally provided with the application was not updated to reflect this change.	Condition 4 within the Licence has been amended to exclude Row 5 in Table 4 that makes reference to the dust proof cutting room which does not exist at the Premises. The dust proof cutting room noted in Table 4 of Section 5.3 of the Decision Report has been removed to reflect this change.
	<u>Licence: Conditions 16 and 17 - Reporting</u> The Applicant has confirmed that annual reporting be provided on 31 July each year for the preceding annual period.	Conditions 16 and 17 within the Licence have been updated accordingly.
	<u>Licence: Schedule 1: Figure 2 - Site Layout Plan</u> The Applicant provided an updated Site Layout Plan to include the location of refrigerant gas storage.	Figure 2 of Schedule 1 within the Licence has been removed and replaced with the updated 'Site Layout Plan' provide by the Applicant that includes the location

Method	Comments received	DWER response
		<p>of the storage area for refrigerant gases.</p> <p>The updated 'Site Layout Plan' provided by the Applicant has been included in Figure 1 of Section 5.3 of the Decision Report.</p>
	<p><u>Decision Report: Section 5.3 – Infrastructure</u></p> <p>The Applicant provided further clarification and detail on the operational process of the base separator machinery.</p>	<p>This additional information has been included in Section 5.2 'Operation aspect' of the Decision Report.</p>
	<p><u>Decision Report: Section 5.3 – Infrastructure</u></p> <p>The Applicant confirmed that the underground sump on site is constructed from concrete and is blind (sealed and designed to contain).</p>	<p>This additional information has been noted in Table 4 of Section 5.3 of the Decision Report.</p>
	<p><u>Decision Report: Section 7.4 - Applicant controls (Dust)</u></p> <p>The Applicant advised that the storage bins in the undercover area of the Premises are contained to ensure dust emissions are controlled.</p> <p>The Applicant confirmed that the mattress storage area is inside the warehouse.</p>	<p>The controls for dust emissions discussed in Table 6 of Section 7.4 of the Decision Report have been updated to reflect this additional information.</p>
	<p><u>Decision Report: Section 7.4 – Applicant controls (noise)</u></p> <p>The Applicant confirmed that the hours of operation for the Premises only occur between 7:30am to 3:30pm Monday to Friday.</p>	<p>The additional information in relation to noise control emissions has been included in Table 6 of Section 7.4 of the Decision Report.</p>
	<p><u>Decision Report: Section 8.1 – Risk Assessment (Operation)</u></p> <p>The Applicant confirmed that a dust proof cutting room fitted with an industrial extraction system has not been installed at the Premises. The Applicant advised that dust emissions are captured through containment of processing within a fully enclosed building and through daily cleaning of settled dust.</p>	<p>Table 7 of the Decision Report has been updated to within this information. The Delegated Officer has determined that the exclusion of this infrastructure at the Premises will not change the risk assessment for dust emissions during operation.</p>

10. Conclusion

Based on the assessment in this decision report, the Delegated Officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

MANAGER WASTE INDUSTRIES REGULATORY SERVICES

An officer delegated by the CEO under section 20 of the EP Act

Appendix 1: Key documents

Document title	Availability
Licence (L9220/2019/1) application form and supporting documentation (August, 2019)	DWER records (DWERDT194358)
DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	accessed at www.dwer.wa.gov.au
DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	
DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	
DER, February 2017 <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	
DWER, June 2019. <i>Guideline: Decision Making</i> . Department of Water and Environmental Regulation, Perth.	