



Application for Licence Amendment

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

Licence Number	L9262/2020/1
Licence Holder	Minesite Recycling Pty Ltd
ACN	128 335 893
File Number	DER2020/000313
Premises	Minesite Recycling 68 Chaffers Street SOUTH BOULDER WA 6432 Lot 1912 on Deposited Plan 187369, Volume 2068 Folio 584
Date of Report	6 August 2021
Decision	Revised licence granted

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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 L9262/2020/1 is held by Minesite Recycling Pty Ltd (Licence Holder) for the Minesite Recycling (the Premises), located at 68 Chaffers Street South Boulder WA 6432.

This Amendment Report documents the assessment of potential risks to the environment and public health from the construction and operation of additional liquid storage tanks at the Premises. As a result of this assessment, Revised Licence L9262/2020/1 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. The Revised Licence has been granted in the new format.

2. Scope of assessment

2.1 Regulatory framework

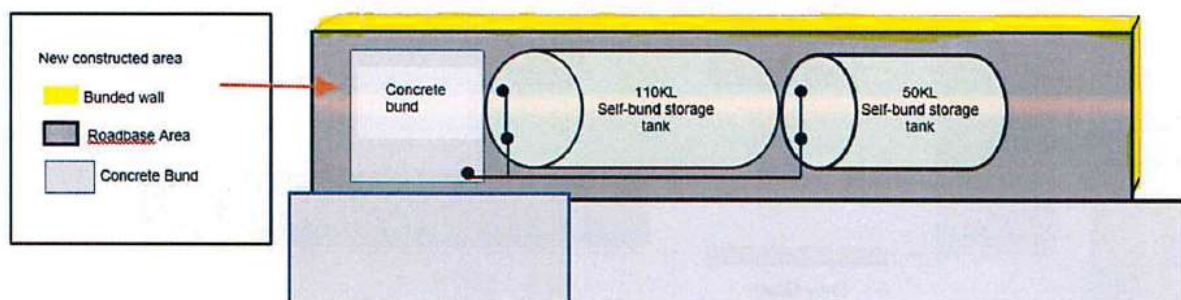
In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary

On 12 April 2021, the Licence Holder submitted an application to the department to amend Licence L9262/2020/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Construction and operation of two new 50kL and 110kL self-bunded tanks at the Premises to store J100, J120 and J170 liquid waste.
- Construction of a concrete bund transfer pad adjacent to the self-bunded tanks to transfer liquid waste.
- Acceptance of two new types of waste at the Premises; J120 and J170 wastes.

An area beside the existing undercover shed will be utilised for the two tanks and concrete bund transfer pad. A 4x22m area incorporating a 1m meter bund will be constructed using road-base material. The two self-bunded tanks will be installed on the road-base pad and a bunded concrete transfer pad will be constructed in front of the tanks which will serve as the transfer unloading/loading area to contain any spills. The two self-bunded tanks are prefabricated tanks and will simply be delivered to site and sited in the appropriate location. Figure 1 provides an overview of the self-bunded tank area.



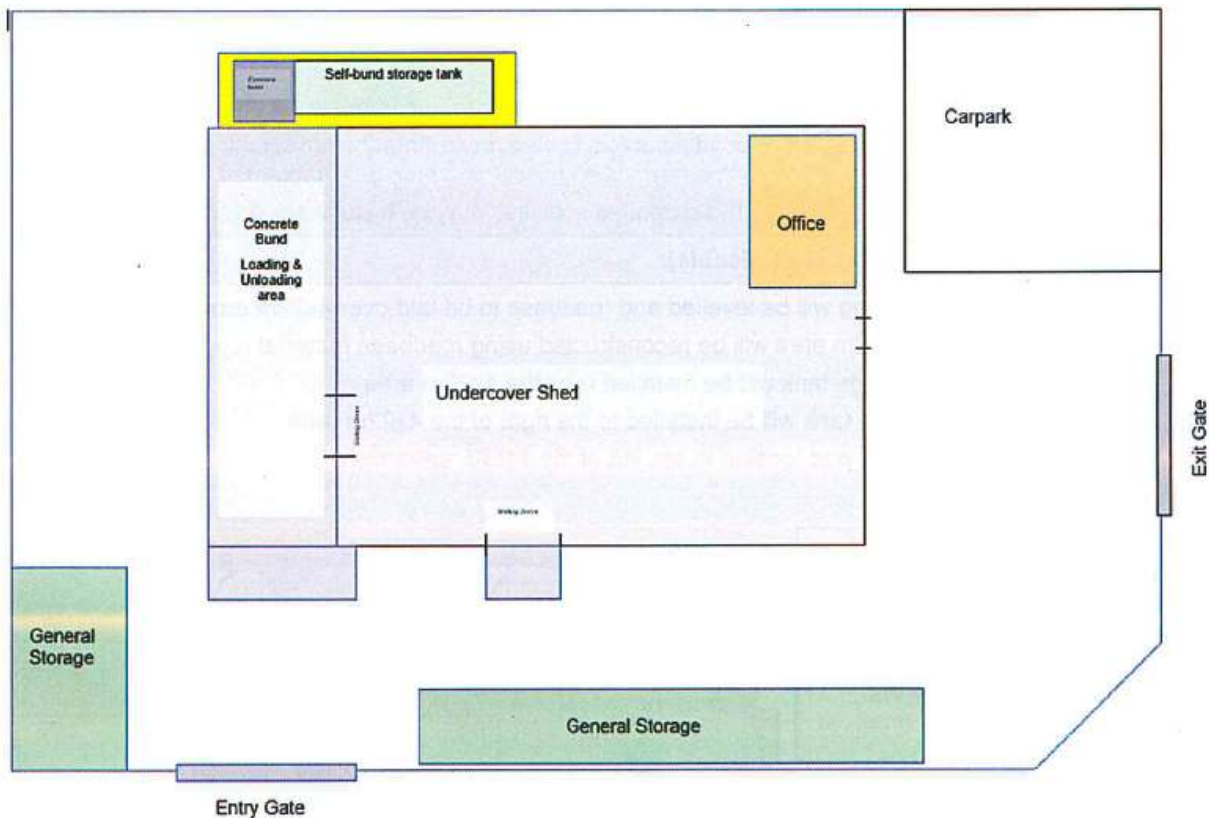


Figure 1. Self-bund tank area.

The Licence Holder requests the acceptance of J120 and J170 waste at the premises in addition to J100 waste as approved on the Existing Licence. J120 waste will be accepted as rags and hoses only, while J170 waste will be accepted as used oil filters. Both new J120 and J170 waste types will not include free liquids. The waste will be received in 2.6m³ hydro bins and transferred into 11m³ bins on site. Unloading and loading will take place in the concrete area situated to the side of the existing shed/warehouse. The waste, once processed, is destined for disposal to Class III landfill. The volume of J120 and J170 waste will not trigger Category 62 Solid waste depot Production and Design Capacity of 500 tonnes per annual period so the addition of Category 62 to the Existing Licence is not required presently. If volumes of J120 and J170 waste exceed 500 tonnes per annual period, a Category 62 licence may be required, and the Licence Holder should seek this authorisation.

As a result of the above, the Department has initiated an amendment to Licence L9262/2020/1 to incorporate the following changes:

- The addition of conditions 4, 5 and 6 to allow construction of the two self-bund tanks and concrete hardstand transfer pad.

Table 5 provides the overview of the complete licence amendment.

Existing conditions on the licence are sufficient to mitigate emissions during operations post construction of the two self-bund tanks and concrete hardstand pad as outlined in Table 3.

3. Risk assessment

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

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

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 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
Dust	Liquid Waste acceptance, handling (during unloading), storage and loading for distribution to clients locally. Vehicle movements	Air/windborne pathway	Premises speed limit.
Noise		Air/windborne pathway	Comply with <i>Environmental Protection (Noise) Regulations 1997</i> . Operations only occur during the day.
Odour	Storage of waste oils	Air/windborne pathway	Storage within sealed ICBs and Shed
Spillages/ Breach of containment causing discharge to land/ Contaminated runoff as a result of rainwater interacting with any liquid waste spilt or tracked out of the storage shed		Overland runoff and infiltration to groundwater	Licence condition 1 requires the clean-up and containment of any spills onsite. Licence condition 1 requires the maintenance of drains and sumps to ensure the continued performance of the stormwater and drainage systems. Licence condition 1 restricts how liquid waste should be received onsite- only allows receipt of IBCs containing liquid waste Licence condition 4 allows for the types of waste that could be accepted at the premises Concrete lined impervious hardstand.
Fire/smoke-abnormal operation		Air/windborne pathway	Licence condition 1 requires the maintenance of the fire extinguishers in accordance with the standards.
Fire water – abnormal operations		Overland runoff and infiltration to groundwater	Condition 2 requires that water is not discharged beyond the boundary of the premises in the event of the fire.

3.1.2 Receptors

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

Table 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 (*Guidance Statement: Environmental Siting* (DER 2016)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential Premises	The applicant has determined that the closest residential sensitive receptor is approximately 300 m from the prescribed premises. DWER Geocortex dataset review of the premises location identifies that it is located within a 'General industry' zoned area, under Local Planning Scheme.
Main Reef Tavern	Approximately 450m north of the proposed premises boundary
Environmental receptors	Distance from prescribed activity
Public Drinking Water Supply Area	The premises is not located within a Public Drinking Water Supply Area (PDWSA). The nearest PDWSA is located approximately 20km from the premises boundary.
Threatened and/or priority fauna- protected migratory birds	Approximately 1km south of the premises.
Priority 3 flora	Approximately 1.5 km west of the premises.
Groundwater	Depth to groundwater encountered at approximately 10 – 20 mbgl. Hypersaline groundwater. No beneficial uses of groundwater in the site vicinity. Groundwater mainly used for dust suppression in that area.
Soil type classification	Soils underlying the area consists of loams to clay based with a median range of 20-55% clay content.

3.2 Risk ratings

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

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

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Licence L9262/2020/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. prescribed premises activities associated with categories 61 defined under the EP Regulations.

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 operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of Licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Lift-off from disposal of tyres, Heavy vehicle movements	Dust	Air/windborne pathway causing impacts to health and amenity	Human and environmental receptors listed in Table 2	Refer to Table 1	C = Slight L = Unlikely Low Risk	Y	N/A	N/A
Noise from waste oil drop-off, storage and removal and Heavy vehicle movements	Noise				C = Slight L = Unlikely Low Risk	Y	N/A	N/A
	Odour				C = Slight L = Unlikely Low Risk	Y	Condition 7	N/A
Storage of waste oils	Spillages/ Breach of containment causing discharge to land/ Contaminated runoff as a result of rainwater interacting with any liquid waste spill or				C = Slight L = Unlikely Low Risk	Y	Condition 1, 7, 8, 9, 12 and 13. Condition 4	No additional licence conditions for operations are required for the amendment. Condition 4 allows construction of the self-bunded tanks and concrete bund.

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				
	tracked out of the storage shed							
Storage of waste oils	Fire/smoke-abnormal operation				C = Moderate L = Unlikely Medium Risk	Y	Condition 1, 7, 8, 9, 14, 15 and 16.	N/A
Storage of waste oils	Fire water – abnormal operations				C = Moderate L = Unlikely Medium Risk	Y	Condition 2 and 3	N/A

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

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

4. Consultation

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

Table 4: Consultation

Consultation method	Comments received	Department response
<i>Licence Holder was provided with draft amendment on 6/7/2021.</i>	Licence Holder provided a response on 28/7/2021 indicating no comment and requesting the amendment be processed.	N/A
<i>Local Government Authority advised of proposal 4/06/2021 requesting a response by 17/06/2021. The City of Kalgoorlie-Boulder responded on 5 July 2021.</i>	The City has advised they have no objection to this proposal and has granted Planning Approval.	N/A

5. Conclusion

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

5.1 Summary of amendments

Table 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	Proposed amendments
1	Inclusion of the two self-bunded tanks and concrete bund to ensure they are maintained and operated in accordance with the requirements in Table 1. Change maximum overall total volume for all storage areas from 72,000L to 250,000L as per amendment request.
4	Allows construction of the two new self-bunded tanks and concrete bund.
5	Provision of Compliance Report once construction has occurred.
6	Requirements of the Compliance Report.
7	Addition of J120 and J170 to Waste Acceptance
9	Addition of the two self-bunded tanks and new Schedule 1 Figure 3 map.
17	Addition of waste types J120 and J170 for Monitoring.

Existing condition	Proposed amendments
Schedule 1: Maps.	New Map Figure 3 identifying self-bunded tank and concrete bund area for construction and operations.

References

1. DER July 2015. *Guidance Statement: Regulatory principles*. Department of Environment Regulation, Perth. Accessed at www.dwer.wa.gov.au
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3. DER, August 2016. *Guidance Statement: Licence duration*. Department of Environment Regulation, Perth. Accessed at www.dwer.wa.gov.au
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7. DWER, June 2019. *Guideline: Industry Regulation Guide to Licensing*. Department of Water and Environmental Regulation, Perth. Accessed at www.dwer.wa.gov.au