



Choose an item.

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

Choose an item.	W6271/2019/1
Choose an item.	Conveyor Belt Solutions Pty Ltd
ACN	611 507 585
DWER file number	DER2019/000314
Premises	Conveyor Belt Solutions 1 Butcher Street Lot 282 on Plan 189584 Certificate of Title Volume 1891 Folio 79 As defined by the Premises maps attached to the issued licence
Date of report	10 October 2019

1. Definitions

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

Table 1: Definitions

Term	Definition
Applicant	Conveyor Belt Solutions Pty Ltd
Category / categories	Categories of prescribed premises as set out in Schedule 1 of the EP Regulations.
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the <i>Environmental Protection Act 1986</i> Locked Bag 10 JOONDALUP DC WA 6919 info@dwer.wa.gov.au
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>
Minister	the Minister responsible for the EP Act and associated regulations
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Occupier	has the same meaning given to that term under the EP Act.
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>
UDR	<i>Environmental Protection (Unauthorised Discharges) Regulations 2004 (WA)</i>
Works Approval Holder	Conveyor Belt Solutions Pty Ltd

2. Overview of premises

2.1 Classification of Premises

Table 2: Classification of premises and assessed design capacity

Category	Description	Assessed production or design capacity or throughput
Category 62	Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use.	7,500 tonnes per annual period.

2.2 Description of proposed activity

Conveyor Belt Solutions Pty Ltd currently holds a Category 62 licence L9141/2018/1 for the processing of recycled conveyor belts at Lot 1 Yeates Road, Kwinana Beach.

The Applicant has applied for a works approval to transfer its conveyor belt recycling operations from the current address to Lot 282 Rollings Crescent, Kwinana Beach. The application details that the site is currently vacant and comprised of a number of large metal sheeted buildings and is predominantly covered in bitumen hardstand.

The premises is located within a 'general industry' zoned area located within the Town of Kwinana local government authority area. The applicant holds a lease agreement for the operation of the premises from 1 March 2018 to 1 March 2023, with Matilda Capital Pty Ltd.

The application details that the activities relating to the recycling of conveyor belt will be identical to that adopted previously. Used conveyor belts received at the premises in large rolls will be transferred into smaller rolls and placed in shipping containers for export overseas.

The applicant has defined their operational process for the conveyor belting as follows:

- *Incoming rolls of conveyor belt are stored in the open in the yard area (See Figure 2 for allocated storage areas);*
- *When resources are available, the conveyor belts are transferred into smaller rolls which are sized to be readily accommodated in standard shipping containers. The transfer occurs by simply placing the large roll on a rotating spindle and pulling conveyor onto another mechanically driven spindle. Once the required diameter of roll is reached, the conveyor belt is cut and the small diameter roll is directed to a different storage area. A new small roll is then commenced. Cutting of the belt occurs using non-thermal equipment to minimise the risk of fires (i.e. is no torches or high-speed abrasive equipment is used).*
- *The smaller rolls of conveyor belting are also stored in the yard;*
- *When the a sufficient quantity of the smaller rolls has been accumulated, the small conveyor rolls are stacked inside shipping containers and transported to Fremantle Port by truck for export.*

The premises is constructed across all operational areas with impermeable material such as bitumen hardstand. The premises includes the following infrastructure:

- Enclosed metal workshop area with impermeable (150 mm concrete) base;
- Weigh bridge (60 MT);
- Administration office block (brick/ concrete);
- Parking bays (impermeable, bitumen);

- Storage areas (outdoor, impermeable, bitumen) with bulk bins and sea containers.

The storage of conveyor belting will consist of six storage areas:

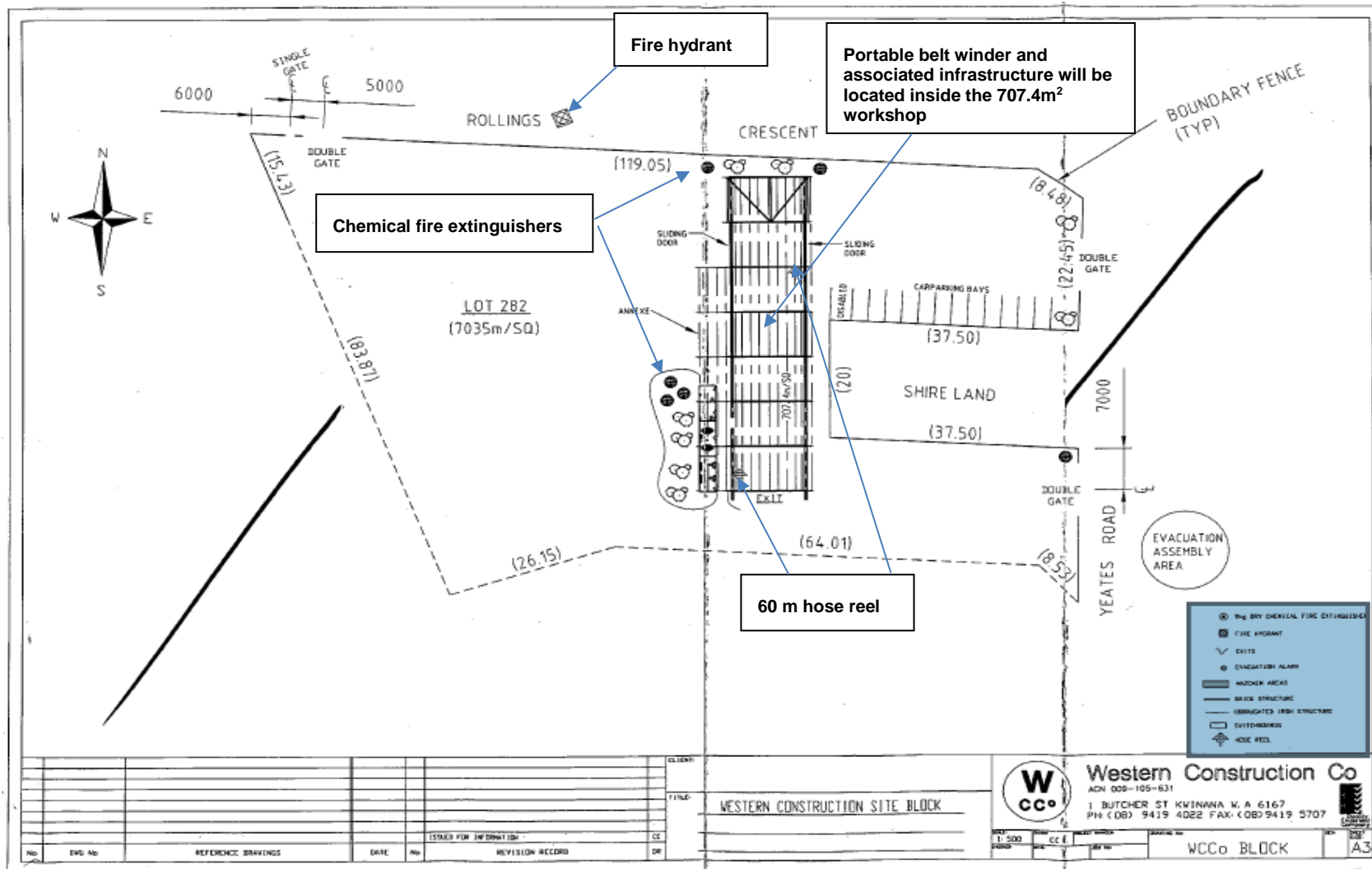
- 3 outside in the open for receipt; and
- 3 outside in the open for processed belting awaiting export.

Conveyor Belt Solutions Pty Ltd (the applicant) is proposing to receive 7,500 tonnes per annum of conveyor belting from third party operators which will result in the premises triggering the threshold value of a Category 62 – Solid waste depot for the processing, storage and final disposal via export overseas of recycled (new/ old) conveyor belting material (natural/ synthetic).

The infrastructure and equipment are outlined in the table below and the site layout is shown in Figure 1.

Ref	Infrastructure or Equipment	Site Layout Plan reference (Figure 1)
1	Portable Belt Winder - Rotating spindles and pulling conveyor	Figure 1 in Schedule 1
2	High pressure water jet cutters.	Figure 1 in Schedule 1
3	Concrete hardstand belt winding area	Figure 1 in Schedule 1
4	Trucks	N/A—mobile equipment
	Other activities – storage of incoming and processed conveyor belts	
1	Sea containers for use in exporting belting overseas for final disposal	Figure 1 in Schedule 1
2	Fire hydrants	Figure 1 in Schedule 1

Figure 1: Site Layout Plan



3. Legislative context and other approvals

Approvals relevant to the premises are outlined in the table below.

The City of Kwinana granted an approval to commence development for the works on 10 June 2019 with conditions (see attachment 1) relating to the development approval

Legislation	Number	Approval
Planning and Development Act 2005	9436	Lot 282 on Plan 189584- approval granted (25 June 2019)

4. Emission sources, receptors and pathways

4.1 Emissions

The potential for emissions to impact on sensitive receptors has been assessed in accordance with the Department's Risk Framework. The key emissions during premises construction which have been considered in this report are dust and noise from installation of the infrastructure including equipment placement and vehicle movements.

The Applicant has proposed measures to assist in controlling these emissions, where necessary. The control measures are outlined in Section 4.4 below and have been considered when undertaking the risk assessment detailed in Section 5.

The table below provides a summary of the potential emissions relating to the premises.

Following completion and compliance with this works approval, a prescribed premises category 62 licence under Part V of the EP Act will be required to authorise emissions associated with the operation of the premises. A risk assessment for the operational phase has been included in this Decision Report, however licence conditions will not be finalised until DWER assesses the licence application. The key emissions considered in during premises operation are dust and noise from the receipt of the conveyor belting, movement of belting via conveyors, fire, smoke and fire water leachates from abnormal operations.

Source	Potential Emission	Proposed Controls
Construction		
Equipment, infrastructure relocation and truck movements.	Dust	See section 4.4
	Noise	See section 4.4
Operation		
Receipt of the conveyor beltings and movement of belting via conveyors, vehicles	Dust	See section 4.4
	Noise	See section 4.4
Abnormal operations – fire (Natural/ synthetic rubber conveyor belting	Particulates, sulfur dioxide (SO ₂), polyaromatic hydrocarbons (PAHs) and	See section 4.4

material/ rolls	elemental carbon.	
	Fire water leachates containing (PFOS/ PFAS, PAH, BTEX, Carbon particulates)	See section 4.4

4.2 Receptors

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. 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 5 considers these receptors in the context of emissions and potential pathways.

Human receptors	Distance from activity or prescribed premises
Residential Premises	The applicant has determined that the closest residential sensitive receptor is approximately 1.5 km from the prescribed premises. DWER GISViewer dataset review of the premises location identifies that it is located well within a 'General industry' zoned area, under Local Planning Scheme 'KWIN2'.
Environmental receptors	Distance from activity / prescribed premises
Swan Coastal Plain Lakes	Located within the <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> , enacted boundary area.
Kwinana Atmospheric Waste	Located within the <i>Environmental Protection (Kwinana Atmospheric Wastes) Policy 1999</i> , enacted boundary area – 'Area A'.
Threatened/Priority Fauna	Schedule 2 fauna - located approximately 300 m North of the premises boundary Priority fauna – located approximately 325 m NNE of the premises boundary.

4.3 Pathways

As dust and noise are considered potential emissions, the prevailing wind direction has been considered. The applicant has determined the following meteorological information relevant to the prescribed premises locality:

4.3.1 Wind direction and strength

"Winds in the Kwinana area are typically characterised by strong offshore (easterly) breezes during the daytime followed by corresponding onshore breezes (from the southwest) as the land cools during the evening. This sea breeze/land breeze cycle is typical of WA coastal environments, particularly in spring and summer."

4.3.2 Regional climatic aspects

"The Kwinana area is described as having a Mediterranean climate, characterised by hot dry summers and mild wet winters. Climate data has been sourced from the Bureau of Meteorology

(BOM) averages for Medina Research Centre Weather Station (ID: 9194) (2.8km away from the Kwinana Industrial Area) for the period 1983 to 2014 (BOM, 2014).”

4.3.3 Rainfall and temperature

“Rainfall in the Kwinana area is seasonal and is generally confined to the winter months (June to August). Mean monthly rainfall is highest in July at 147 mm with an average of 15.5 rain days, and lowest in January at 11mm with an average of 1.5 rain days. The average annual rainfall is 758mm generally falling over 89.5 rain days (BOM, 2014).

The mean annual maximum and minimum temperatures for the Medina Weather Station are 31.5°C and 8.1°C, respectively. The highest temperatures are usually experienced in February, when the mean monthly maximum temperature is 31.5°C and the mean monthly minimum temperature is 17.6°C. Minimum temperatures occur in August, when the mean monthly maximum and minimum temperatures are 18.8°C and 8.1°C, respectively (BOM, 2014).”

These pathways have been considered in the risk assessment table in Section 5.

4.4 Applicant controls

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

Emission (as identified above)	Source	Proposed controls
Dust	<i>Equipment, infrastructure relocation and truck movements.</i>	<i>According to the applicant no substantial construction works will be carried out. The portable belt winder will be relocated inside the workshop. Bitumen hardstand outside.</i>
	<i>Movement of belting via conveyors, vehicles and at storage area</i>	<i>Periodical sweeping of the storage and workshop area will be undertaken at the premises by the applicant. All vehicles will be required to travel at ≤10 km/ hr within the premises boundary. Bitumen hardstand outside.</i>
Noise	<i>Equipment, infrastructure relocation and truck movements.</i>	<i>According to the applicant no substantial construction works will be carried out. No residences in close proximity.</i>
	<i>Movement of belting via conveyors, vehicles and at storage area.</i>	<i>The belt winder and shearer are the only infrastructure/ equipment being used besides truck movements, and the infrastructure is being operated within an enclosed metal deck building. Approximately two incoming and 3 outgoing vehicle movements per day are anticipated at the premises.</i>

		<p><i>The actual process of winding the conveyor from one roll to another is conducted with an electric belt winder and the sound level of this equipment is so low that it will not increase the noise emission profile of the site.</i></p>
Smoke	Fire- abnormal operation	<p><i>Fire management plan in place for entire site, which includes fire hydrant/s, a fire brigade booster with compatible fittings for water sources and portable chemical fire extinguishers in the storage area and the workshop area.</i></p> <p><i>Use of high pressure water jet cutters only.</i></p> <p><i>No more than 1000 tonnes of belting will be stored at the premises at any given time.</i></p> <p><i>No more than 500 tonnes within six storage areas.</i></p> <p><i>Staffs will be trained in the appropriate responses in the event of fire.</i></p>
Leachate	Fire water- abnormal operation	<p><i>Hardstand constructed to meet not less than 1×10^{-9} m/s permeability with drive over bunds to all doors to capture waste water within the buildings.</i></p> <p><i>Use of temporary bunding, in the event of an accidental fire.</i></p> <p><i>Impermeable surfaces throughout the premises</i></p> <p><i>Disposal of all/ any captured firewater by a licensed liquid waste contractor.</i></p>

5. Risk assessment

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 Applicant have been considered in determining the risk rating. Emissions during construction and operation have been assessed separately. This is because separate approvals are needed for each. The works approval that accompanies this report authorises construction only. A licence is required to operate the premises.

5.1 Risk assessment – construction

Risk Event				Consequence rating*	Likelihood rating*	Risk*	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
Placement of portable belt winder and associated equipment including vehicle movements.	Dust	Air/windborne pathway causing impacts to health and amenity of closest human receptors approximately 1.5 km from the premises.	As discussed in section 4	Slight	Unlikely	Low	<p>The minor construction works (equipment placement) are not expected to generate significant dust emissions.</p> <p>The proposed controls are expected to be sufficient at mitigating dust emissions.</p> <p>The Delegated Officer considers that the provisions of section 49 of the EP Act is sufficient to regulate dust emissions during construction.</p>	N/A
	Noise		As discussed in section 4				<p>The Delegated Officer has considered that human receptors will not be significantly impacted by noise emissions.</p> <p>Noise regulations apply</p> <p>The Delegated Officer considers that any noise impacts that may arise can be regulated under the provisions of the Noise Regulations.</p>	

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

5.2 Risk assessment – operation (information only)*

Risk Event				Consequence rating**	Likelihood rating**	Risk**	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
Movement of belting via conveyors, vehicles and at storage area	Dust	<p>No residential premises in close proximity. No sensitive flora or fauna communities in close proximity.</p> <p>General industrial premises adjacent to premises.</p>	As discussed in section 4	Minor	Unlikely	Low	<p>The Applicant's proposed dust mitigation controls are likely to be sufficient at mitigating dust emissions.</p> <p>Approximately two incoming and 3 outgoing vehicle movements per day are anticipated at the premises.</p> <p>All vehicles will be required to travel at ≤ 10 km/ hr within the premises boundary.</p> <p>The Delegated Officer considers low risk dust emissions can be adequately regulated under the EP Act 1986.</p>	To be determined at licensing assessment stage*
	Noise	No residences or other sensitive receptors in close proximity.	As discussed in section 4	Moderate	Possible	Medium	<p>The application states that the actual process of winding the conveyor from one roll to another is conducted with an electric belt winder and the sound level of this equipment is quite low that it will not increase the noise emission profile of the site. However the Applicant has not provided information relating to the probable noise emission levels of the portable belt winder to demonstrate compliance with the EP Noise Regulations. This will need to be reconsidered as part of the licence assessment process.</p>	To be determined at licensing assessment stage*

Risk Event				Consequence rating**	Likelihood rating**	Risk**	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
Processing and storage of rubber (natural/ synthetic) conveyor belting material/ rolls	Fire/ smoke (Abnormal operation)	Residential receptors 1.5 km from the premises	As discussed in section 4	Moderate	Rare	Medium	The fire infrastructure and operation of the premises will be required to be in compliance with AS 2419.1, AS 1851-2012 and DFES Guidance note GN02. At the time of drafting, the premises fire safety engineering report was still being finalised.	To be determined at licensing assessment stage*
	Fire water leachates (Abnormal operation)	Groundwater dependent ecosystems	As discussed in section 4	Moderate	Rare	Medium	The premises consists of a low permeability hardstand throughout and with the use of temporary bunding, in the event of an accidental fire, will assist in the containment of any leachates or firewater that may occur as a result of putting out accidental fires. The applicant is also required to ensure that all doors contain drive over bunding to capture waste water within the buildings.	To be determined at licensing assessment stage*

*The works approval that accompanies this Report authorises construction only. A licence is required for operations.

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

6. Consultation

Method	Comments received	DWER response
<i>Application advertised on DWER website (29/07/2019)</i>	<i>None received</i>	<i>N/A</i>
<i>Application advertised in The West Australian newspaper (5/08/2019)</i>	<i>None received</i>	<i>N/A</i>
<i>DFES advised of proposal (2 August 2019)</i>	<i>None received</i>	<i>N/A</i>
<i>Applicant referred draft documents (17 September 2019)</i>	<i>None received</i>	<i>The delegated Officer has determined that in the absence of any response the works approval will be issued as set out in the draft.</i>

7. Conclusion

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

Stephen Checker
MANAGER WASTE INDUSTRIES
INDUSTRY REGULATION

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

Appendix 1: Key documents

Document title	Availability
Works Approval (W6271/2019/1) application form and supporting documentation (May, 2019)	DWER records (A1802719)
Email from Phil Volich: Further information received 28/06/19. Evidence of lease to Conveyor Belt Solutions Prescribed boundary details Cost breakdown information City of Kwinana Planning approval	DWER records (A1807518)
Email from Phil Volich: Further information received 5/07/19 Property boundary map provided	DWER records (A1807520)
DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	accessed at www.dwer.wa.gov.au
DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	
DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	
DER, May 2016. <i>Guidance Statement: Publication of Annual Audit Compliance Reports</i> . Department of Environment Regulation, Perth.	
DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	
DER, September 2016. <i>Guidance Statement: Environmental Standards</i> . Department of Environment Regulation, Perth.	
DER, November 2016. <i>Guidance Statement: Environmental Siting</i> . Department of Environment Regulation, Perth.	
DER, February 2017. <i>Guidance Statement: Land Use Planning</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.	
DWER, June 2019. <i>Guideline: Industry Regulation Guide to Licensing</i> . Department of Water and Environmental Regulation, Perth.	

Attachment 1: Planning Approval



PLANNING AND DEVELOPMENT ACT 2005

CITY OF KWINANA

DECISION OF APPLICATION FOR PLANNING APPROVAL

Parcel Number: 8361, 655, 1293 Application Number: 9436
Assessment Number: 8056
Lot Number: Lot: 38 DP: 50856
Lot: 282 DP: 189584
Lot: 22 DP: 9796
Property: 1 Butcher Street KWINANA BEACH 6167

Development:	General Industry - Conveyor Belt Processing
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OWNER DETAILS: **PA Kwinana Corporation Pty Ltd**
 Suite 8, 643 New Castle Street
 LEEDERVILLE WA 6007

APPLICANT DETAILS: **ACT Industrial Pty Ltd**
 1 Yeates Road
 KWINANA BEACH WA 6167

Council's Planning Approval to the proposed development, described on the application dated 10/06/2019 and the accompanying plans, is **GRANTED** subject to the attached conditions:

CONDITIONS:

- (1) The premises being kept in a neat/tidy condition at all times by the owner/occupier to the satisfaction of the City of Kwinana.
- (2) Stormwater drainage from roofed and paved areas to be contained and disposed of on site at all times to the satisfaction of the City of Kwinana.
- (3) The applicant shall implement dust control measures for the duration of site and construction works to the satisfaction of the City of Kwinana.
- (4) All existing and proposed trafficked routes within the subject lot being sealed and drained to comply with City of Kwinana trafficable area specifications.

City of Kwinana Administration
Corner Gilmore Avenue and Sulphur Road, Kwinana WA 6167 | **Hours** Monday to Friday 8am to 5pm
PO Box 21, Kwinana WA 6966 | **Telephone** 08 9439 0200 | **Fax** 08 9439 0222 | **NRS** 133 677 (hearing/speech impaired)
Email customer@kwinana.wa.gov.au | **Website** kwinana.wa.gov.au

- (5) This approval is valid for 24 months only. If development is not substantially commenced within this period a fresh approval must be obtained before commencing or continuing with the development.

ADVICE NOTES:

- (1) The applicant is advised that all future development must be submitted to the City of Kwinana prior to the commencement of works or alteration of land use.
- (2) Should the applicant be aggrieved by the decision or any condition imposed, then a review may be lodged with the State Administrative Tribunal within 28 days of the date of this decision.
- (3) The applicant is further advised that this is not a building permit the City of Kwinana issues to enable construction to commence. A building permit is a separate Council requirement and construction cannot be commenced until a building permit is obtained.
- (4) The applicant should ensure the proposed development complies with all other relevant legislation, including but not limited to, the Environmental Protection Act 1986 and Regulations, Health (Miscellaneous Provisions) Act 1911 and Regulations, and the National Construction Code.

Date: 25 June 2019
Signed:



Felicitas Dhliwayo
A/COORDINATOR STATUTORY PLANNING