Application for Works Approval

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

Works Approval Number	W6483/2020/1
Applicant	JD Organics Pty Ltd t/a Garden Organics
ACN	154 081 651
File Number	DER2015/000261-1~3
Premises	Boonanarring Composting Facility 276 Aurisch Road BOONANARRING WA 6026 Legal description Lot 12 on Diagram 92147 As defined by the coordinates in Schedule 1 of the Works Approval
Date of Report	25 March 2021
Decision	Works approval granted

Steve Checker

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Date: 2021.03.25 17:57:36 +08'00'

Stephen Checker
Manager, Waste Industries

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

This Decision Report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and time limited operation of the Premises. As a result of this assessment, Works Approval W6483/2020/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Decision 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 and overview of Premises

On 10 December 2020, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake construction of a new hardstand and leachate pond for the receipt and processing of organic feedstocks at the Premises. The Premises is approximately 15 km north of Gingin.

The Premises relates to the categories and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in Works Approval W6483/2020/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guidance Statement: Risk Assessments* (DER 2017) are outlined in Works Approval W6483/2020/1.

The Premises has been in operation since 2015 and is currently licenced under Licence L8887/2015/1, to compost up to 27,000 tonnes per annual period of organic material including green waste, sawdust, pinebark, spent compost mushroom and manures. The Premises also accepts and composts up to 2,000 tonnes per annual period of grease trap waste.

On 18 November 2019 the Licence (L8887/2015/1) was amended to authorise a trial to compost 500 tonnes of food organics and garden organics (FOGO) waste over a period of up to 12 months. The intention of this trial was to determine the optimal receipt, handling and processing of FOGO waste to produce a composted product that meets the required specifications.

Composting occurs within an enclosed composting shed with an odour extraction system, as well as outdoors on a concrete hardstand. Leachates are captured via a leachate collection and pond system. The licence currently requires monitoring of seven groundwater bores and surface water monitoring of the leachate ponds.

The works approval application is for the following:

- Construction of hardstand no.3 (including receivals area and mixing pad area)
- Construction of leachate pond no.3
- 5,000 tonnes per annum (tpa) Category 61 (proposed increase from 2,000 tpa under Licence L8887/2015/1)
- 44,500 tpa Category 61A (proposed increase from 27,000 tpa under Licence L8887/2015/1)
- 49,500 tpa Category 67A (proposed increase from 27,000 tpa under Licence L8887/2015/1)

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 *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 construction and time limited operation which have been considered in this Decision Report are detailed in Table 1 below. Table 1 also details the proposed control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction of additional hardstand and leachate pond			
Dust	Vehicle movements Earth works	Air/windborne pathway	Use of dust cart to wet down access road in dry conditions Traffic plan for site to be followed
Noise	Vehicle movements Earth works	Air/windborne pathway	Speed limits on internal roads Delivery/collection contractors not to idle at the site gates All vehicles to be regularly serviced
Operation of additional hardstand and leachate pond			
Odour	Waste acceptance Composting Turning of windrows Leachate pond	Air/windborne pathway	Implementation of odour management plan, including: Spent mushroom compost, poultry, cow and sheep bedding processed within 48 hours; FOGO and grease trap waste processed on receival to site; Initial composting/pasturisation of FOGO to occur within an enclosed forced aeration system; FOGO will not be unloaded into composting facility when wind is blowing from a south/south westerly direction; Monitoring of moisture and temperature; Pre booking of deliveries of odorous feedstocks; and Use of sediment traps and aerators on

Emission	Sources	Potential pathways	Proposed controls
			leachate ponds.
Leachate	Waste acceptance and composting Storage of leachate in leachate pond Seepage through hardstand areas and ponds Damage/rupture of pond liner Overtopping of ponds; Run-off from hardstand	Seepage through soil and transport through groundwater	Hardstand constructed to achieve a permeability of less than $1x10^{-9}$ m/s Hardstands graded with a 4% fall to the leachate ponds Monitoring of moisture content of compost A freeboard of 1m will be maintained in leachate ponds
Noise	Waste acceptance and composting activity Vehicle movement	Air/windborne pathway	Speed limits on internal roads Delivery/collection contractors not to idle at the site gates All vehicles to be regularly serviced
Dust	Waste acceptance and composting activity Vehicle movement	Air/windborne pathway	Use of dust cart to wet down access road in dry conditions Traffic plan for site to be followed
Particulates, noxious gases and smoke	Compost fire	Air/windborne pathway	Implementation of fire management plan, including: Installation of a 180,000 L water storage tank dedicated to fire fighting; Windrow moisture content to be kept at between 40 – 60%; Annual inspection of fire extinguishers and other firefighting equipment; Site security; Green waste stockpiles to have a 10 m trafficable distance between each pile and each pile is to be no more than 5 m high and 5 0m long and 10 m height; Use of water trucks; Flammable goods not to be stored in green waste area; 8x50 mm water hydrants around composting hardstands; 5 m separation between composting windrows; Compost piles to be no more than 3 m high, 6

Emission	Sources	Potential pathways	Proposed controls
			m wide and 40 m long; Compost temperature not to exceed 70 degrees.
Pathogens	Compost	Direct contact	Production of products is carried out in accordance with AS4454.

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 applicant 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 and Figure 1 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	Closest residential receptor is located approximately 1,000 m north-east of the prescribed activities, and approximately 280 m from the Premises boundary. This receptor is also approximately 45 m higher in elevation that the Premises.
	Residential receptor located approximately 2 km west of the Premises boundary.
Environmental receptors	**Distance from prescribed activity**
Yurine Swamp Nature Reserve	2.9km south-west of the Premises boundary
Groundwater - Water is considered to be fresh (0-500 mg/L TDS) which may have a beneficial value for drinking water, non-potable use, irrigation and livestock use.	Based on the groundwater monitoring data, groundwater across the site within the superficial aquifer was encountered between 11 and 24 metres below ground level (mbgl). Site investigations identified that the confined aquifer (Leederville) is located approximately 60 mbgl. The inferred groundwater flow of the superficial aquifer is east to west towards the series of unnamed lakes, with the confined aquifer having an inferred flow direction towards the south-west. Five (5) groundwater monitoring bores are located within 1 km of the prescribed activities (based on available GIS dataset – DWER owned and registered WIN Groundwater Sites): • 720 m south-east (up gradient); • 770 m east, north-east (up gradient);

	• 1 km south, south-east (upgradient); and • Two located 1.3 km south-east (up gradient). The closest down-gradient groundwater monitoring bore installed in the superficial aquifer is located 2.1 km west, south-west of the prescribed activities.
Resource Enhancement Wetland	Located 185 m south-west of the Premises boundary
White lake	Located 1.5 km west of the Premises boundary
Unnamed lakes	Ranging from 1.3 km south and between 2.5 and 3.3 km west of the Premises boundary
Threatened ecological community (TEC) – Banksia dominated woodlands of the Swan Coastal Plain	Mapped within the Premises boundary. Approximately 40m west of the prescribed activities
Department of Biodiversity, Conservation and Attractions managed land – Boonanarring Nature Reserve	Located 270 m east of the Premises boundary

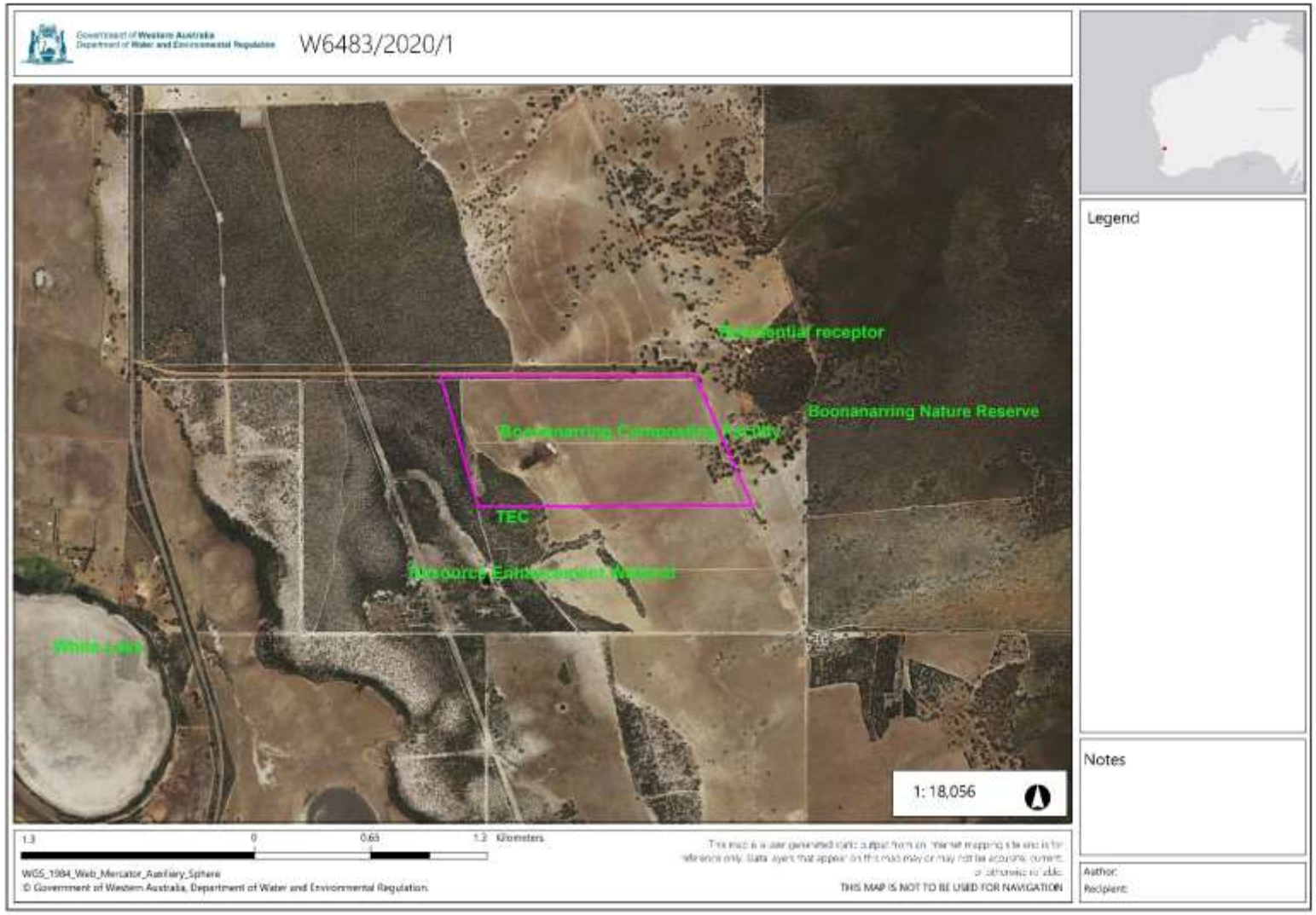

Figure 1: Sensitive receptors

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) for each identified emission source 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 applicant 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 applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

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

Works Approval W6483/2020/1 that accompanies this Decision Report authorises construction and time-limited operations. The conditions in the issued Works Approval, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the new hardstand and leachate pond at the Premises. A risk assessment for the operational phase has been included in this Decision Report, however licence conditions will not be finalised until the department assesses the licence application.

Table 3: Risk assessment of potential emissions and discharges from the Premises during construction and time limited operation

Risk Event					Risk rating[1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Construction								
Earthworks and construction of Leachate Pond 3 and Hardstand 3. Vehicle movements	Dust	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor 1,000 m north-east of prescribed activities	Refer to Section 3.1	C = Slight L = Possible **Low Risk**	Y	Condition 7 (complaints)	The Delegated Officer considers that the construction works are not likely to generate significant dust emissions. The general provisions of the EP Act will apply.
	Noise			Refer to Section 3.1	C = Slight L = Possible **Low Risk**	Y	Condition 7 (complaints)	The Delegated Officer considers that the construction works are not likely to generate significant noise emissions. The general provisions of the EP Act and the *Environmental Protection (Noise) Regulations 1997* will apply.
Operation of additional hardstand and leachate pond								
Acceptance of 49,500 tpa of waste Composting Turning of windrows Leachate pond	Odour	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor 1,000 m north-east of prescribed activities	Refer to Section 3.1.1	Refer to detailed assessment in Section 3.3 below			

Risk Event					Risk rating[1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Waste acceptance and composting Storage of leachate in leachate pond Seepage through hardstand areas and ponds Damage/rupture of pond liner Overtopping of ponds; Run-off from hardstand	Leachate	Seepage through soil and transport through groundwater causing contamination of groundwater and surface water.	Groundwater – superficial aquifer (11 to 24 mBGL). Resource Enhancement Wetland 185 m south-west of Premises boundary Threatened Ecological Community 40m west of prescribed premises	Refer to Section 3.1.1	Refer to detailed assessment in Section 3.4 below			
Waste acceptance Composting activities Vehicle movement around site	Noise	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor 1,000 m north-east of prescribed activities	Refer to Section 3.1.1	C = Minor L = Unlikely **Medium Risk**	Y	N/A Operational conditions are imposed on licence L8887/2015/1. Further conditions may be imposed once the Licence is amended to accommodate the increased throughput.	This works approval authorises the construction and operation of hardstand 3 and leachate pond 3 only. Licence L8887/2015 must be amended to authorise the increased throughput. Therefore, operational requirements regarding the increased waste acceptance and production of compost products have not been conditioned on the works approval.
Waste acceptance Composting activities Vehicle movement around site Storage of greenwaste	Dust	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor 1,000 m north-east of prescribed activities	Refer to Section 3.1.1	C = Minor L = Unlikely **Medium Risk**	Y		
Compost fires	Particulates, noxious gases, smoke and ash	Air/windborne pathway causing impacts to health and amenity from smoke inhalation. Air/windborne pathway causing impacts to the quality of surface water.	Closest residential receptor 1,000 m north-east of prescribed activities Threatened Ecological	Refer to Section 3.1.1	C = Major L = Rare **Medium Risk**	Y		

Risk Event					Risk rating[1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		Direct contact impacting on health of native vegetation located within the Premises boundary and beyond.	Community 40 m west of prescribed premises					
End product	Pathogens	Direct contact causing impacts to human health	End product uses	Refer to Section 3.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	N/A Operation conditions are imposed on licence L8887/2015/1. Further conditions may be imposed once the Licence is amended to accommodate the increased throughput.	

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

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

3.3 Detailed risk assessment – odour emissions from operation

3.3.1 Hazard characterisation and potential impacts

Odour generated in the compost process is generally associated with receipt, storage, handling and decomposition of putrescible feedstocks, and leachate and runoff generated from feedstock and compost in the initial pasteurisation stages.

Odour can cause amenity and health impacts to surrounding receptors. Individual responses to odour may vary depending on a person's sensitivity to odours, age, health status and previous exposure patterns to odour. Community impacts from odour can include annoyance, potentially leading to stress, and loss of amenity. Exposure to repeated odour events can create a nuisance effect.

Exposure times and frequency of odour emissions will be dependent on day to day activities and weather conditions. The pathway for odour emissions is air/wind, therefore the prevailing wind direction has been considered. Using information available on the Bureau of Meteorology's website, the closest available weather station for climate data is Gingin Aero (No. 009178. Approximately 29 km away from Boonanarring). Based on the climate data for the Gingin Aero station, the prevailing wind direction is easterly (17 km/h) in the morning and south westerly (21.6 km/h) in the afternoon.

3.3.2 Current situation

The current operation at the Boonanarring Composting Facility is licensed (L8887/2015/1) to produce 27,000 tonnes of compost per annual period and has been in operation since 2015. A search of the departments Incidents and Complaints Management System has not identified any complaints regarding odour emissions from the premises.

3.3.3 Odour assessment

As part of the 2019 licence amendment, to undertake a FOGO composting trial, the licence holder committed to:

- Prior to the acceptance of FOGO, carry out a smoke test on the enclosed shed when wind conditions are above 10 kms per hour. This test will be used to determine the negative pressure attributes, air exchange rates and the potential for odour release;
- Prior to the acceptance of FOGO, carry out five odour field assessments during different wind conditions and times of day to determine the offsite odour impacts from the existing operations;
- Periodic assessment of odour intensity by a person not permanently located at the facility.

The Licence Holder commissioned OPAM Consulting to undertake an odour baseline assessment in April 2020 and an odour assessment during the FOGO trial.

The initial baseline odour assessment (smoke test) identified that fugitive emissions could escape the composting shed through a couple of gaps in the large door on the south east side. These gaps were sealed prior to the FOGO trial. The FOGO odour assessment concluded that "When considering all activities on site including FOGO processing, for light to fresh winds, all odours can be recognized well within the site boundary which provides an available buffer for any increase of production for the site as already indicated in the Baseline odour report" (OPAM Consulting, 2020).

The odour baseline assessment and the FOGO trial odour assessment were referred to the department's Air Quality Branch (AQB) for review and advice. The AQB advised that the department generally required proponents to follow procedures set out in its *Guideline: Odour*

Emissions (the Guideline) to support an application to expand an existing industry of this nature. These procedures were not followed in the reports compiled by OPAM Consulting (AQB, 2021).

The Odour Assessment only directly addresses odour impact extents resulting from the trial of 500 tonnes of FOGO throughput, rather than the impacts of increased throughput of FOGO (to 8000 tonnes) combined with increased throughput of other feedstocks (AQB, 2021).

As the Odour Assessment does not meet the requirements for a Detailed Analysis as described in the Guideline, it is by itself insufficient to demonstrate that this receptor will not be unacceptably impacted by odour associated with the proposal. However, much of the missing information is contained in the application and FOGO Trial Report, which AQB has considered in place of an odour analysis report.

The applicant advised that that FOGO operation was running at full capacity (two windrows) at the time of the odour field surveys. Consequently it may be inferred that the impact extent of FOGO operations (subtle odour measured at a maximum distance of 200m) is unlikely to change significantly as a result of the increased FOGO feedstock tonnage (AQB, 2021). However, the frequency of measured “obvious” and “subtle” FOGO related odour detected in the field at these distances (subtle odour was measured at a maximum distance of 200m during the field surveys) is likely to increase (AQB, 2021).

It should be noted however that the field results contained in the Odour Assessment are limited in nature and may not have captured worst case impact conditions (i.e. relating to both emissions and meteorology). The impact extent has been estimated by AQB using simple power function ratios to be in the order of 500-600 m (AQB, 2021).

3.3.4 Criteria for assessment

There are no set threshold or concentration criteria for odour assessment. Under section 49(5) of the EP Act, it is an offence to emit or cause to be emitted, an unreasonable emission from any premises.

Any unreasonable emission is defined in the EP Act (section 49(1)) as an emission or transmission of noise, odour or electromagnetic radiation which unreasonably interferes with the health, welfare, convenience, comfort or amenity of any person.

3.3.5 Applicant/Licence Holder controls

Section 3.1.1 above (Table 1) details the control measures the applicant has proposed to assist in controlling odour emissions.

3.3.6 Key findings

The Delegated Officer has reviewed the information regarding odour emissions and has found:

1. The field results contained in the Odour Assessment are limited in nature and may not have captured worst case impact conditions (i.e. relating to both emissions and meteorology).
2. The odour impact extent from the proposed operations has been estimated by AQB to be in the order of 500-600 m.
3. The closest residential receptor is located approximately one kilometre north west of the prescribed activities.

3.3.7 Consequence

Given that the closest residential receptor is located 1,000 m from the prescribed activities, the

Delegated Officer has determined that off-site impacts of odour will be minimal. Therefore, the Delegated Officer considers the consequence of odour emissions to be **minor**.

3.3.8 Likelihood of Risk Event

Due to the distance to residential receptors and that highly odorous feedstocks will be pasturised within an enclosed facility, the Delegated Officer has determined that odour emissions, impacting receptors, will probably not occur in most circumstances. Therefore, the Delegated Officer considers the likelihood of odour emissions causing impacts to amenity is **unlikely**.

3.3.9 Overall rating of odour risk

The Delegated Officer has compared the consequence and likelihood ratings described above with the risk rating matrix and determined that the overall rating for the risk of odour emissions is **medium.**

3.4 Detailed risk assessment – leachate associated with operation

3.4.1 Hazard characterisation and potential impacts

Leachate emissions from compositing facilities have the potential to contain nutrients, metals, salts and other soluble or suspended components and decomposition products of the waste. Leachate also generally has a high biochemical oxygen demand.

Without effective containment measures, composting leachate has the potential to infiltrate to soil and groundwater or flow into surface water bodies. This may lead to adverse environmental impacts or affect the beneficial use of these resources. Beneficial use means a use of the environment, or of any portion thereof, which is conducive to public benefit, public amenity, public safety, public health or aesthetic enjoyment and which requires protection.

Hazard to surface water and groundwater

Groundwater (superficial aquifer) at the premises is between 11 and 24 m below ground level and flows is an east to west direction.

The Premises is located within 185 m of a Resource Enhancement Wetland, which is located down hydraulic gradient. Resource Enhancement Wetlands are wetlands that have been partially modified but still support substantial ecological attributes and functions. The expression of contaminated groundwater in this surface water body may result in eutrophication and the excessive growth of algae. Algae growth may impact the survival of existing organisms through light and oxygen restriction and cause the degradation of the surface water value and beneficial use.

Banksia Woodlands of the Swan Coastal Plain threatened ecological community (TEC) is mapped in the vicinity (~40 m) of the prescribed activities. The dominant Banksia species associated with this TEC obtains part of its water needs from groundwater. Changes in groundwater levels, groundwater quality, and seasonal fluctuations in groundwater can influence the structure and composition of Banksia woodlands. In addition this woodland could be impacted through degradation of soil quality in the event of spillages of leachate (due to breakdown in infrastructure) or overtopping of the leachate pond.

Soils within the Premises are defined as “Red and yellow deep sands” This soil type is likely to have very low attenuating capacity for contaminants and therefore if leachate is not sufficiently contained, contaminants may easy pass through the soil into groundwater.

3.4.2 Criteria for assessment

The following guidelines are considered appropriate assessment criteria to assess the potential impact on the beneficial use of groundwater.

- Australian and New Zealand Guidelines for Fresh and Marine Water Quality ANZECC &

ARMCANZ (2000) for livestock drinking water quality.

The following guidelines are considered appropriate assessment criteria to assess the potential impact on groundwater dependent and freshwater ecosystems and surface water quality.

- Australian and New Zealand Guidelines for Fresh and Marine Water Quality ANZECC & ARMCANZ (2000) for slightly moderately disturbed ecosystems (95% protection level trigger values).

3.4.3 Applicant/Licence Holder controls

Section 3.1.1 above (Table 1) details the control measures the applicant has proposed to assist in controlling leachate emissions.

3.4.4 Key findings

The Delegated Officer has reviewed the information regarding leachate emissions and has found:

1. The storage and handling of compost and leachates has the potential to impact groundwater and surface water quality if not appropriately contained.
2. The soil type at the premises is likely to be highly permeable.
3. There are several receptors in close proximity.
4. A freeboard of 1m will be maintained for all leachate ponds.
5. Hardstand 3 will be constructed to achieve a permeability of less than $1x10^{-9}$ m/s

3.4.5 Consequence

Based on the proximity of receptors and sensitivity of receiving environment (resource enhancement wetland and TEC), the Delegated Officer has determined that leachate emissions could cause mid-level off-site impacts. Therefore, the Delegated Officer considers the consequence to be **major**.

3.4.6 Likelihood of Risk Event

Based on the Licence Holder's proposed controls, the Delegated Officer has determined that leachate emissions may only occur in exceptional circumstances Therefore, the Delegated Officer considers the likelihood of leachate impacts to the human and environmental health to be **rare**.

3.4.7 Overall rating of leachate risk

The Delegated Officer has compared the consequence and likelihood ratings described above with the risk rating matrix and determined that the overall rating for the risk of leachate emissions from operations is **medium.**

4. Consultation

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

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website (08/01/2021)	None received	N/A
Local Government Authority advised of proposal (20/01/2021)	In an email dates 21/01/2021 the Shire of Gingin advised that "At the 15 December 2020 Ordinary Council Meeting Council resolved to approve an Application for Development Approval for additional hardstand and leachate dam to service the existing noxious industry (composting facility) on Lot 12 Aurisch Road, Boonanarring". The Development (Planning) Approval dated 21 December 2020 is consistent with the plans contained in the documentation supporting the Works Approval.	The department notes this advice.
Applicant was provided with draft documents on 16/03/2021	In an email dated 18/03/2021 the applicant requested to waive the notification period.	Noted

5. 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.

The works approval authorises the construction and time limited operation of the proposed infrastructure. However, it does not authorise the increase in feedstocks. Licence L8887/2015/1 will have to be amended to authorise the increase in feedstocks. In accordance with the department's *Industry Regulation Guide to Licensing* an application to amend Licence L8887/2015/1 can be submitted at the same time as the Environmental Compliance Report (as required by Condition 2 of this works approval).

The increased feedstocks have been risk assessed as part of this works approval in order to determine if it is appropriate to approve the infrastructure required to support the proposed throughput increase.

References

1. Air Quality Branch (AQB) 2021, Air Quality Technical Advice for Works Approval W6483/2020/1.
2. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
3. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
4. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
5. Department of Water and Environmental Regulation 2019, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western Australia.

6. OPAM Consulting 2020, *JD Organics Boonanarring Baseline Assessment* (June 2020).
7. OPAM Consulting 2020, *JD Organics Boonanarring Odour Assessment* (October 2020).

Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY					
Application type					
Works approval	☒				
Licence	☐	Relevant works approval number:		None	☐
		Has the works approval been complied with?		Yes ☐ No ☐	
		Has time limited operations under the works approval demonstrated acceptable operations?		Yes ☐ No ☐ N/A ☐	
		Environmental Compliance Report submitted?		Yes ☐ No ☐	
		Date Report received:			
Renewal	☐	Current licence number:			
Amendment to works approval	☐	Current works approval number:			
Amendment to licence	☐	Current licence number:			
		Relevant works approval number:		N/A	☐
Registration	☐	Current works approval number:		None	☐
Date application received		9 December 2020			
Applicant and Premises details					
Applicant name/s (full legal name/s)		JD Organics Pty Ltd ta Garden Organics			
Premises name		Boonanarring Composting Facility			
Premises location		276 Aurisch Road, Boonanarring			
Local Government Authority		Shire of Gingin			
Application documents					
HPCM file reference number:		DER2015/000261-4~3			
Key application documents (additional to application form):		Odour baseline assessment Odour Assessment FOGO Trial Groundwater monitoring results Groundwater post FOGO Leachate analysis Summary of FOGO trial product testing			

	FOGO trial report Certificate of title ASIC extract Authorization letter Hardstand and leachate dam specification Water balance equation Fire management plan odour management plan Vehicle movements Planning approval
Scope of application/assessment	
Summary of proposed activities or changes to existing operations.	Construction of a new hardstand (10,000 m^2) and leachate pond (4,000 m^2). Time limited operation is also requested under this application.

Category number/s (activities that cause the premises to become prescribed premises)

Table 1: Prescribed premises categories

Prescribed premises category and description	Proposed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 61: Liquid waste facility – premises on which liquid waste produced on other premises (other than sewage waste) is stored, reprocessed, treated or irrigated.	2,000 tonnes per annual period (approved under L8887/2015/1)	
Category 61A: Solid waste facility – premise (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.	50,000 tonnes per annum maximum capacity This is an increase from 27,000 tonnes per annual period approved under L8887/2015/1	
Category 67A: Compost manufacturing and soil blending – tonnes per annual period premises on which organic material (excluding silage) or waste is stored pending processing, mixing, drying or composting to product commercial quantities of compost or blended soils.		

Legislative context and other approvals		
Has the applicant referred, or do they intend to refer, their proposal to the	Yes ☐ No ☒	Referral decision No:

EPA under Part IV of the EP Act as a significant proposal?		Managed under Part V ☐ Assessed under Part IV ☐
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes ☐ No ☒	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes ☐ No ☒	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes ☒ No ☐	Certificate of title ☒ General lease ☐ Expiry: Mining lease / tenement ☐ Expiry: Other evidence ☐ Expiry:
Has the applicant obtained all relevant planning approvals?	Yes ☒ No ☐ N/A ☐	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 ☐ No ☒	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 ☐ No ☒	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 ☒ No ☐	Application reference No: Licence/permit No:GWL176152 (appears to have been decommissioned)
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes ☐ No ☒	Name: N/A Type: Has Regulatory Services (Water) been consulted? Yes ☐ No ☐ N/A ☐ Regional office:

Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes ☐ No ☒	Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes ☐ No ☐ N/A ☐
Is the Premises subject to any other Acts or subsidiary regulations (e.g. *Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx*)	Yes ☐ No ☒	N/A
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes ☐ No ☒	N/A
Is the Premises subject to any EPP requirements?	Yes ☐ No ☒	N/A
Is the Premises a known or suspected contaminated site under the *Contaminated Sites Act 2003*?	Yes ☒ No ☐	Classification: information request Date of classification: N/A