Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Works Approval Amendment

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

Works Approval Number	W6531/2021/1
Works Approval Holder	Controlled Waste Disposals Pty Ltd
ACN	163 120 803
File Number	APP-0031977
Premises	Controlled Waste Disposals 9 Cocos Drive, Bibra Lake WA 6163 Legal description – Lot 197 on Deposited Plan 17235 Certificate of Title Volume 1879 Folio 848 As defined by the Premises map attached to the Revised Works Approval
Date of Report	5 June 2026
Decision	Revised works approval granted

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1. Decision summary

Works Approval W6531/2021/1 is held by Controlled Waste Disposals Pty Ltd (Works Approval Holder) for the Controlled Waste Disposals premises (the Premises), located at 9 Cocos Drive, Bibra Lake WA 6163.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during construction and operation of the Premises. As a result of this assessment, Revised Works Approval W6531/2021/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

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

2.2 Application summary

On 14 October 2025, the Works Approval Holder submitted an application to the department to amend Works Approval W6531/2021/1 under sections 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The amendment was limited to an extension of time-limited operations authorised under condition 14 of the works approval.

On 28 April 2025, the department had provided notice that the following areas of the premises could commence time-limited operations:

- Main building
- Tank Farm (tanks TK1 to TK6)
- Solid sorting treatment area
- Air filtration unit
- External yard storage areas

The premises has encountered delays in constructing the remaining liquid treatment area. As time-limited operation of the approved infrastructure was due to end on 25 October 2025, the works approval holder requests an extension in time-limited operations (TLO) for the infrastructure previously authorised, allowing the liquid treatment area to be constructed, commissioned and operated under TLO during this extension, and for a licence amendment application to be prepared and assessed.

The department had undertaken compliance inspections for the premises on 19 May 2025 and 3 October 2025 to ascertain compliance with W6531/2021/1. As a result of the inspection findings, and following the cessation of time-limited operations, a r.27 Notice under the *Environmental Protection (Controlled Waste) Regulations 2004* was issued to the works approval holder on 19 December 2025. The notice directed all specified wastes to be removed from the premises within the time specified in the notice.

An inspection was subsequently undertaken on 22 April 2026 to confirm and assess changes to the proposed infrastructure as identified in the Environmental Compliance Reports.

This amendment will be limited to the time-limited operations associated with the infrastructure identified above, whilst also extending the expiry date of the works approval to correspond with the TLO end date.

Table 1 below outlines the proposed changes to the existing Works Approval.

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
Category 61: Liquid waste facility	41,000 tonnes per year	No change	Extension to time-limited operations proposed.
Category 61A: Solid waste facility	5,000 tonnes per year	No change	

2.3 Compliance history

The department considers an occupier's compliance history to be a relevant factor in establishing the risk context for an amendment, in accordance with the department's Guideline: Risk Assessments (2020). In assessing the current application, the department has had regard to compliance inspections undertaken at the premises.

The department undertook compliance inspections at the premises on 19 May 2025 and 3 October 2025 to assess compliance with conditions of the works approval. A range of non-compliances were identified at the time of the inspection and are currently under investigation.

These non-compliances were formally communicated to the works approval holder in correspondence issued by the department, which requested corrective actions and supporting evidence to demonstrate rectification. The documentation submitted by the works approval holder on 4 May 2026 to address the non-compliances has been considered in this assessment.

Key findings:

1. The compliance issues at the premises have been considered in the department's risk assessment and in determining the appropriate regulatory controls required. The delegated officer has applied an increased likelihood of risk events occurring onsite due to the compliance history of the occupier.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

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

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway(s) during premises operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the control measures the Works Approval Holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Works Approval Holder controls

Emission	Sources	Potential pathways	Proposed controls
Odour	Acceptance, treatment and storage of waste (liquid and sludge)	Air/windborne pathway	- Existing controls as assessed in the Decision Report dated 14 February 2022. The Environmental Compliance Report stated that provision of a large, static hood over the treatment areas will impact the use of equipment used to handle waste, including the overhead crane in the building and mobile plant such as forklifts and small excavators. As such, wall mounted ducting and flexible ducting has been installed to direct air to the activated carbon filter. - Wall mounted ducting to an activated carbon filter from the following areas, rather than a large, static hood over the treatment areas: - Bulk unload bay - Electrocoagulation/electrowinning unit and feed tank - Oily water plate separator vessel - UV-ozone reactor vessel - DAF unit - Solid sorting treatment area .
Noise	Acceptance, treatment and storage of waste (liquid and sludge) Vehicle movements	Air/windborne pathway causing impacts to health and amenity	- Existing controls as assessed in the Decision Report dated 14 February 2022.
Dust	Acceptance, treatment and storage of waste (liquid and sludge) Vehicle movements	Air/windborne pathway causing impacts to health and amenity	- Existing controls as assessed in the Decision Report dated 14 February 2022.
Contaminated or potentially contaminated stormwater	Acceptance, treatment and storage of waste (liquid and sludge)	Direct discharge to land and surface waters causing contamination	- The concrete pad contains a 150 mm high concrete bund along the western boundary and is graded to a central drainage channel with two sumps (capacity 1,000 L each). - Stormwater water falling on the concrete pad flows to the central drain and sumps and has the potential to be discharged through a full retention oil water separator to the clean stormwater system. - Stormwater collected from the main building roof and the southern external

Emission	Sources	Potential pathways	Proposed controls
			bitumen area discharges into soakwells due to the absence of contamination. - No waste materials will be handled or stored outside of designated containment areas. - Bulk storage of liquids will be in tanks with bunding that has a capacity of at least 110% of the largest tank. - Individual drums and IBCs containing liquid waste will be stored within containment areas. - The main building has a 32 mm high rubber rollover bund to contain any spillage that may occur in the main building, with the building having a total containment capacity of approximately 52 kL. - Bulk liquid receivals will take place inside the main building. - Tank-level monitoring (Capacitance-Diaphragm Sensors [CDS]). - Daily tank and bund inspection.
Treated wastewater	Treatment of liquid waste	Degradation of surface water and groundwater quality	- Existing controls as assessed in the Decision Report dated 14 February 2022.
Particulates and noxious gases	Fire (from the mixing of incompatible waste types or otherwise)	Air/windborne pathway	- Existing controls as assessed in the Decision Report dated 14 February 2022. - Controls as per Contaminated or potentially contaminated stormwater controls.
Contaminated fire water	Washwater resulting from a fire event	Degradation of surface water and groundwater quality	- Controls as per Contaminated or potentially contaminated stormwater controls. - An automatic shut off valve situated prior to the separator can be activated in the case of spills or fire events to contain water within the concrete pad and sumps. The combined capacity of the pad and sumps is 158 kL. In addition, potentially contaminated water captured in the pad and sumps can be transferred to one of the tanks in the Tank Farm via a below ground pump station for storage and treatment on-site.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Works Approval Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises *(Guideline: Environmental siting* (DWER 2020)).

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

Human receptors	**Distance from prescribed activity**
Residential Premises (Yangebup)	750 m southeast
Commercial/industrial property	Adjacent to the west, within 100 m to the east, north and south
Recreational areas	South Lake Reserve (270 m northeast), Nicholson Reserve (950 m southeast), Levi Park (750 m southeast) and Little Rush Lake (1 km east)
Environmental receptors	**Distance from prescribed activity**
Protected ecological community (Tuart woodland)	300 m northeast
Bush Forever site	650 m northeast
Multiple use / Resource enhancement geomorphic wetland (South Lake)	725 m northeast
Underlying groundwater (non-potable purposes)	The Perth Groundwater Map states that the site is underlain by Tamala Limestone and that groundwater beneath the site is 27 m below ground level. There are no groundwater abstraction bores or public drinking water source areas located within 1,000 m of the site.

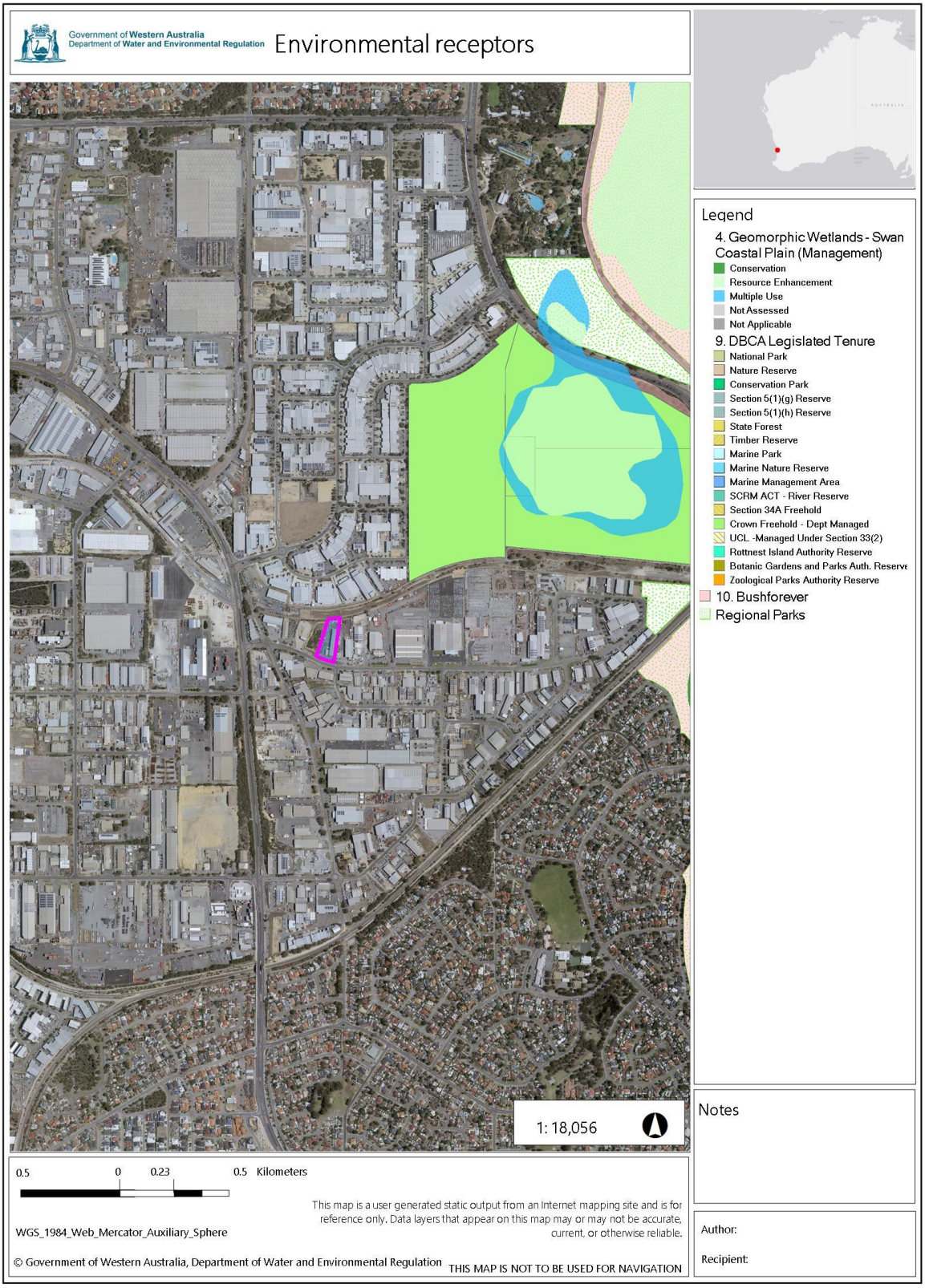

Figure 1: Distance to sensitive receptors

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Works Approval 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 Works Approval Holder's proposed controls to be critical to maintaining an acceptable level of risk, these are incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the Works Approval Holder's controls are not deemed sufficient. Where this is the case, the need for additional controls is documented and justified in Table 4.

The Revised Works Approval W6531/2021/1 that accompanies this Amendment Report authorises construction and time-limited operations. The conditions in the Revised Works Approval 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 Premises. A risk assessment for the time-limited operational phase consistent with the scope outlined in section 2.2 has been included in this Amendment Report, however licence conditions will not be finalised until the department assesses the licence application.

Table 4. Risk assessment of potential emissions and discharges from the Premises time-limited operation

Risk Event					Risk rating[1] C = consequence L = likelihood	Works Approval Holder's controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Works Approval Holder's controls**				
Time-limited-operations								
Waste acceptance, storage and treatment Solidification of sludge residue Waste laden vehicle movements	Odour	Air/windborne pathway causing impacts to health and amenity	Residences 750 m southeast Commercial/industrial receptors – adjacent to the west, within 100 m to the east, north and south	Refer to Section 3.1	C = Moderate L = Possible **Medium Risk**	N	Existing conditions 1 to 7, 9, 11, 12, 15, 16, 22, 24 and 31	The Environmental Compliance Report stated that provision of a large, static hood over the treatment areas will impact the use of equipment used to handle waste, including the overhead crane in the building and mobile plant such as forklifts and small excavators. As such, wall mounted ducting and flexible ducting has been installed to direct air to the activated carbon filter. The delegated officer considers that the change does not adversely the mitigation of odour emissions and has amended the requirements within the works approval.
	Noise	Air/windborne pathway causing impacts to health and amenity	Residences 750 m southeast Commercial/industrial receptors – adjacent to the west, within 100 m to the east, north and south	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Existing conditions 1, 21 and 22	The delegated officer considers that the provisions of *the Environmental Protection (Noise) Regulations 1997* are sufficient to regulate noise emissions during time-limited operations.
	Dust	Air/windborne pathway causing impacts to health and amenity	Residences 750 m southeast Commercial/industrial receptors – adjacent to the west, within 100 m to the east, north and south	Refer to Section 3.1	C = Minor L = Rare **Low Risk**	Y	Existing conditions 1, 21 and 22	The delegated officer considers that the provisions of section 49 of the EP Act is sufficient to regulate dust emissions during time-limited operations.
	Spills and Contaminated or potentially contaminated stormwater	Degradation of surface water and groundwater quality	Drainage reserve is located approximately 75 m to the south of the site boundary	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	N	Existing conditions 1, 2, 3, 15 and 23 **Conditions 21 and 22**	See section 3.3.

Risk Event					Risk rating[1] C = consequence L = likelihood	Works Approval Holder's controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Works Approval Holder's controls**				
			Groundwater (27 mbgl)					
Fire (from the mixing of incompatible waste types or otherwise)	Particulates and noxious gases	Air/windborne pathway causing impacts to health and amenity	Residences 750 m southeast Commercial/industrial receptors – adjacent to the west, within 100 m to the east, north and south South Lake Reserve 270 m northeast	Refer to Section 3.1	C = Major L = Possible **High Risk**	N	Existing conditions 1, 2, 3, 11, 12 and 15 to 20 **Conditions 21, 22, 29 and 30**	The delegated officer considers the current regulatory and operational controls sufficient to mitigate the potential for fire events. It is noted that the original assessment and subsequent conditions restricted the site from accepting Class 3, 4 and 5 dangerous goods based on advice from the Department of Mines, Industry Regulation and Safety. Existing condition 18 requires that all wastes accepted in containers must be appropriately labelled with details on the waste type and associated controlled waste code. Existing conditions also ensure that waste must be stored in a manner that prevents incompatible wastes mixing. Additional conditions have been implemented to restrict the volume of waste stored at the premises at any one time. Conditions 29 and 30 have been included to require the maintenance of a waste register, which is to be submitted to the department monthly.
Washwater resulting from a fire event	Contaminated washwater	Degradation of surface water and groundwater quality	Drainage reserve is located approximately 75 m to the south of the site boundary Groundwater (27 mbgl)	Refer to Section 3.1	C = Major L = Unlikely **Medium Risk**	Y	Existing conditions 1, 2, 3, 15 and 23 **Conditions 21 and 22**	The minimum required fire pollution storage volume according to *AS2419.1 Fire hydrant systems* is 4 hour storage capacity based off hydraulics required for the premises. Based on 1 twin head hydrant and 2 hydrants all at 20 L/s, the minimum required fire pollution storage volume is 288 kL. The total containment volume of the concrete pad is 158 KL, whilst the northern bitumen area containment volume is 181 kL. The delegated officer considers that the

Risk Event					Risk rating[1] C = consequence L = likelihood	Works Approval Holder's controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Works Approval Holder's controls				
								containment capacity, in addition to the controls specified in the 'spills and contaminated or potentially contaminated stormwater' emission, is adequate to mitigate fire washwater emissions.

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

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

3.3 Detailed risk assessment for containment

3.3.1 External storage yards

The original proposal specified in the Controlled Waste Disposals Pty Ltd Works Approval Application – Supporting Information (9 November 2020) identified that "*the existing building will be used for the majority of the waste receipt, handling, storage and treatment activities. A tank farm will be constructed at the northeastern corner of the site for the receipt and storage of bulk liquids and external yards areas will be used for the storage and treatment (e.g. crushing) of empty bulk (e.g. isotainers) and small containers (e.g. steel drums and intermediate bulk containers [IBCs])*."

As identified during inspections, the works approval holder has proposed that the external concrete area be used for the storage of packaged waste, due to space limitations in the main building. Through information provided in ECRs, the concrete has been constructed with a minimum thickness of 200 mm thick with SL92 mesh placed with 40 mm top cover.

The concrete pad contains a 150 mm high concrete bund along the western boundary and is graded to a central drainage channel with two sumps (capacity 1,000 L each).

Stormwater water falling on the concrete pad flows to the central drain and sumps and has the potential to be discharged through a full retention oil water separator to the clean stormwater system. The separator is an Atlan Spillceptor, which is a 2-chamber unit with a maximum working capacity of 14,400 L and maximum spill capacity of 9,000 L (at shut-off). The separator is fitted with an automatic closure device (ACD) that closes the separator off automatically when the maximum storage capacity of light liquid (hydrocarbons) is attained. The ACD is to ensure that, in the event of a major spillage, pollutants do not pass into the stormwater drainage system. The separator is also fitted with an automatic alarm/monitoring system that provides a visual and audible warning alarm when the level of the oil reaches approximately 10% of the storage volume.

An automatic shut off valve situated prior to the separator can be activated in the case of spills or fire events to contain water within the concrete pad and sumps. The combined capacity of the pad and sumps is 158 kL. In addition, potentially contaminated water captured in the pad and sumps can be transferred to one of the tanks in the Tank Farm via a below ground pump station for storage and treatment on-site.

The stormwater drainage system is separate to the contaminated water system and is contained under the bitumen yard area at the front of the premises. The stormwater system collects clean rainwater from the Main Building roof and southern bitumen yard area into a series of soakwells.

Correspondence dated 14 April 2025 confirmed that "*the front area of the premises is bituminised and is used for car parking and general (i.e., non-waste related) storage and that the rear area of the yard is bitumised and is not used for waste storage.*"

Key findings:

1. The delegated officer considers that the external concrete area is appropriate for the storage of packaged wastes (i.e. intermediate bulk containers (IBCs)) in addition to empty containers.
2. Given the department's understanding that the existing building was initially proposed to be used for the majority of the waste acceptance and storage, the department will restrict the volume of packaged waste authorised for storage on the external concrete area. The department considers a limit of 400 kL appropriate, equating to approximately 400 IBCs.
3. Although the potentially contaminated stormwater from the concrete pad can

be discharged through the oil water separator, the delegated officer considers that discharge through the soakwells is not appropriate. Due to the presence of waste stored in the concrete area, all stormwater collected in this area will be directed to the tank farm for treatment and disposal through the trade waste sewer.

4. The delegated officer considers that the stormwater collected from the main building roof and the southern external bitumen area is appropriate to discharge into soakwells due to the general absence of contamination.
5. The northern external bitumen area, due to the presence of product storage and operational vehicle movements, will require stormwater to be directed to the tank farm for treatment and disposal through the trade waste sewer.

3.3.2 Main building

Treatment areas, predominantly along the eastern side of the building, are contained within 120 mm high concrete bunds, with all areas of the main building's concrete floor having been sealed with a chemical and oil-resistant coating, including all joints, cuts and incisions.

The solid waste treatment area now uses a combination of three heavy duty steel bins placed within the concrete bunded area, which will allow individual chemical treatment in contained and controlled batches.

The waste types authorised for treatment in the solid waste treatment area during time limited operations have been amended based on the proposed waste types submitted through the amendment application. As such, only A100, B100, J180 and N120 waste types will be authorised for treatment in this area.

3.3.3 LGIRS inspection

The Department Local Government, Industry Regulation and Safety (LGIRS) undertook an inspection of the premises in October 2025 in relation to dangerous goods storage. The following findings were noted:

- The premises was storing dangerous goods above manifest quantity thresholds, with the waste inadequately labelled.
- Segregation between dangerous goods was inadequate in storage areas inside the main building and outdoor area.
- Combustible material stored inside the warehouse adjacent to containers with dangerous goods.
- Damaged IBCs and drums identified not fit for purpose for the storage of waste.

Key findings:

1. The delegated officer has considered the findings of the LGIRS inspection in conjunction with the compliance issues identified in section 2.3 and has applied an increased likelihood of waste storage risk events without additional regulatory conditions being applied.
2. The volume of packaged waste stored within the main building has been restricted to 50 kL, with the volume of waste stored within the external concrete area restricted to 400 kL. These volumes are well within containment capacity of the respective areas, and provide control to manage the operational capacity of the premises.

3. Existing condition 18 requires that all wastes accepted in containers must be appropriately labelled with details on the waste type and associated controlled waste code and must include (as an attachment) the associated safety data sheets (SDS) if the waste was derived from the use of potentially hazardous chemicals.
4. Requirements within the works approval also ensure that waste must be stored in a manner that prevents incompatible wastes mixing.

3.4 Detailed risk assessment for solids treatment

The works approval holder proposes to process and treat the following wastes in the solids sorting treatment:

- A100 (Waste resulting from the surface treatment of metals and plastics);
- B100 (Acidic solutions or acids in solid form);
- J 180 (oil sludge); and
- N120 (Soils contaminated with a controlled waste)

The applicant proposes that A100 and B100 will be treated using pH neutralisation and solidification with alkaline material, expected to be lime. J 180 and N120 will be absorbed using saw dust. Absorbed wastes are then removed from the premises to another premises authorised for the acceptance of that waste in accordance with the *Landfill Waste Classification and Waste Definitions 1996.*

The Delegated Officer does not consider 'solidification' to be an accurate term for the J180 and N120 processes identified above. This process is better described as absorption. Absorption does not render the hazardous constituents of liquid wastes immobile or less mobile via chemisorption mechanisms such as attenuation, chemical reaction and neutralisation or precipitation, ion exchange or encapsulation.

The hazardous contaminants in absorbed liquid wastes are not chemically treated or otherwise remediated by blending with absorbent materials. The waste is only made spadeable and/or the contaminants diluted in order to meet the landfill acceptance criteria for Class II or III putrescible landfills as outlined in the *Landfill Waste Classification and Waste Definitions 1996* (LWCWD).

The LWCWD requires that landfills are for the disposal of solid wastes only. The delegated officer notes that biodegradable absorbents (such as sawdust) readily release absorbed liquid wastes directly into the landfill waste mass, while soils release absorbed liquids when compressed or waterlogged, as might occur during routine landfill operations. This can cause issues with leachate management and contamination at the receiving landfill.

The department acknowledges that absorption is a current practice in industry and is therefore considering a review of liquid waste treatment and disposal practices across industry to align with current legislative principles.

4. Consultation

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

Table 5: Consultation

Consultation method	Comments received	Department response
Works Approval Holder was provided	Refer to Appendix 1	Refer to Appendix 1

with draft amendment on 26 May 2026		

5. Conclusion

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

5.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Works Approval as part of the amendment process.

Table 6: Summary of works approval amendments

Condition no.	Proposed amendments
Cover page	Expiry date amended
1, Table 1	Changes to bunding and infrastructure requirements within the main building based on compliance reporting and inspections. Changes to the external concrete area requirements and stormwater drainage. Addition of the external bitumen areas.
3	Addition of integrity certification for tanks 7 and 8 resulting from fire impact.
14	Changes to the time limited operations duration, with all infrastructure specified until 31 December 2026.
19	Changes to the dedicated waste verification locations.
21, Table 6	Amended to match the changes to Table 1. Waste storage requirements added for the external concrete area.
22	Additional details provided for waste processing requirements.
29	Addition of a condition to maintain a waste register during TLO.
30	Submission of the waste register at the end of each month during TLO.
Figure 2, Schedule 1	Site plan updated

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Summary of Works Approval Holder's comments on risk assessment and draft conditions

Condition	Summary of Works Approval Holder's comment	Department's response
Condition 1, Table 1, Rows 3 and 5	There is an oily water separator though its better description is: "A Coalescing Plate Separator, SPEL Environmental." This description of the separator is consistent with the description of the separator as listed on the Trade Waste Permit granted by the Water Corporation.	References to the oily water separator have been amended.
Condition 1, Row 6	The former external area required an asphalt hardstand, sealed with a chemically resistant and oil-resistant coating. The need for the coating over the asphalt hardstand arose because asphalt does not meet the 1 x 10^{-9} m/s permeability requirement unless it is coated, whereas concrete achieves better that 1 x 10^{-9} m/s permeability. This difference means that a concrete hardstand does not need an extra coating. CWD appreciates that joints, cuts and incisions will need to be adequately sealed and regular maintenance will be needed but, not the whole surface.	The delegated officer agrees with the response, and has removed the chemically resistant and oil-resistant coating requirement. Requirements relating to all joints, cuts or incisions within the concrete area or bunds being sealed to maintain a permeability of 1x10-9 m/s or less have remained.
Condition 1, Table 1	In circumstances where equipment has already operated in Time Limited Operations (TLO), is it necessary to again apply for approval to operate the equipment?	The delegated officer considers that the Main building, Tanks 1-6 in the tank farm, Solids sorting treatment area, Air filtration unit, External concrete hardstand and External bitumen area have demonstrated compliance and do not require the resubmission of an Environmental Compliance Report prior to recommencing TLO.
Condition 15, Table 5	Are the waste acceptance quantities permitted during TLO additive to those that might have occurred in the first TLO phase of operations or are they with respect to the period of time from when the amendment is granted to 31/12/26? This is an important matter because for some categories of waste that were received in the first TLO phase, the amount received is close to the amount specified in Table 5 and as such, extending the duration of TLO has limited, if any effect if, certain waste cannot be accept because of a	The delegated officer considers that the waste acceptance volumes will be reset when the amendment is issued. The rate of acceptance is consistent with the proposed annual throughput volume, with table 5 amended to reflect the period to which the waste volumes apply.

Condition	Summary of Works Approval Holder's comment	Department's response
	quantity limitation.	
Condition 15, Table 5, Row 15	This condition relates to J100 and J120 wastes permitted to be accepted in tankers only. Formerly, CWD was permitted to accept these wastes in tankers, IBCs, drums and other containers.	The delegated officer has amended the acceptance requirements for J100 and J120, allowing for acceptance in tankers, IBCs, drums and other containers. Specific requirements have been included to differentiate process controls for tankered acceptance and package acceptance.
Condition 1, Table 1, Row 7	The external bitumen area includes conditions that require the construction or a southern and northern bitumen areas. CWD notes: a. These areas have already been constructed (is an environmental compliance report needed for existing infrastructure). b. These areas are not used for or in the process of: i. Storing wastes ii. Treating wastes iii. Disposing of wastes c. The bitumen area at the front of the premises is used for car parking d. The bitumen area at the rear of the premises will be used for general storage and not the storage of wastes. e. CWD considers that to put a controlling condition with significant penalties for non-compliance on a car parking area and a general storage area is not a reasonable course of action.	The delegated officer has removed reference to the external bitumen area in the construction requirements table, but has retained the external bitumen area in the infrastructure table. Requirements relating to the external bitumen area have been retained, as they are considered essential controls to manage waste storage and mitigate contaminated stormwater discharges.
Condition 21, Table 6	The condition requires stored wastes to be set back by 3m form the western boundary of the site. At this present time, a 12m high parapet wall has been built on the boundary which abuts the external concrete area. To optimise the utility of the concrete storage area CWD suggests installing a 6m high splash shield on the parapet wall to direct any spillage towards the concrete storage area which would contain any spillage. In this manner, CWD might be able to store materials within 0.5m of the boundary line providing better utility to the storage area.	The delegated officer has amended the requirement, specifying that the 3 m separation distance is retained until such time that a report is submitted to the CEO demonstrating that a parapet wall with a 6 m high chemically resistant splash guard has been installed, with all joints and gaps between the concrete hardstand and parapet wall sealed to maintain a permeability of 1x10-9 m/s or less.
Condition 21, Table 6	The condition permits a maximum of 50kL of waste can be stored in the main building. CWD would appreciate clarification that the permissible quantity of waste does not include wastes that are held within processing equipment.	The condition has been amended to exclude waste within treatment infrastructure form the volume limit.

Condition	Summary of Works Approval Holder's comment	Department's response
Condition 31	Are previous TLO reports sufficient or are new TLO reports required for the solids plant and the tank farm?	The delegated officer confirms that new TLO reports will required to be submitted following the completion of TLO authorised in this amendment, due to the activities undertaken during that time.
Condition 31	The TLO report for the liquids plant would be due on or about 2 October 2026. It follows that the period of time for the report might cover less than half of the permitted TLO duration. CWD suggests that the words, *"or 90 calendar days before the expiration date of the works approval, whichever is the sooner,"* are removed from the condition.	The delegated officer has amended the condition to ensure that the TLO report will be submitted after the completion of TLO activities.