



Application for Works Approval

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

| | |
|------------------------------|--|
| Works Approval Number | W6546/2021/1 |
| Applicant | WESTREF ENVIRO PTY LTD |
| ACN | 645 622 091 |
| File number | DER2021/000265 |
| Premises | Westref Enviro 53 Chisholm Crescent KEWDALE WA 6105 Legal description Lot 244 on Plan 17127 Certificate of Title Volume 1941 Folio 539 As defined by the premises maps attached to the issued works approval |
| Date of report | 22/10/2021 |
| Decision | Works approval granted |

**MANAGER WASTE INDUSTRIES
REGULATORY SERVICES**
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 operation of the premises. As a result of this assessment, works approval W6546/2021/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 5 May 2021, Westref Enviro Pty Ltd (the applicant) submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

2.2.1 Premises overview

The applicant currently occupies 53 Chisholm Crescent, Kewdale (the premises) and manufactures and supplies mining and laboratory products to a variety of clients and industries. This works approval application is to undertake modification works to the existing building infrastructure to accommodate a new waste transfer operation. The applicant has advised that the existing business operation will be moved to an alternate premises once the waste transfer operation is approved for use.

The premises relates to the categories and assessed production / design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W6546/2021/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in works approval W6546/2021/1.

2.2.2 Application and process overview:

The applicant has detailed the following premises modification works under this works approval application:

- Installation of polyurethane drive-over bunding in warehouses and processing areas;
- Installation of ventilation and storage shelving in warehouses; and
- Placement and installation of drainage covers, bunded pallets, spill kits, drum crusher and shredder equipment at the premises.

Time-limited operations have also been requested to allow the acceptance, processing and consolidation of various hazardous and non-hazardous solid and liquid waste materials under a works approval. These waste materials will be sourced from a variety of customers including residential, commercial, industrial and agricultural sectors and will be subject to various processing and treatment activities including:

- Physio-chemical:
 - Acid-alkali neutralisation of waste chemicals; and
 - Oxidisation/reduction treatment to eliminate hazardous properties of reactants.

- Stabilisation & chemical immobilisation using cement, pozzolans and lime by using the following techniques:
 - Macro encapsulation;
 - Micro encapsulation; and
 - Absorption.
- Container/receptacle processing:
 - Intermediate bulk container decontamination and recycling;
 - Drum decontamination, crushing and recycling; and
 - Baling of bulk packaging free from contaminants.
- Waste consolidation, storage and dispatch (transfer).

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 Dangerous goods storage

The applicant has indicated that various dangerous goods will be stored on the premises in accordance with all applicable dangerous goods regulations and the current dangerous goods site licence. These requirements are administered by the Department of Mines, Industry Regulation and Safety who have been consulted as a part of this works approval application (refer to Table 4 for consultation summary).

3.1.2 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this decision report are detailed in Table 1 below. Table 1 also details the 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 | | | |
| Dust | Vehicle movements | Air / windborne pathway | <ul style="list-style-type: none"> • Existing asphalt and concrete surfaces over premises and roadways. • Contractors to manage any dust emissions in accordance with the Department of Environmental Protection publication: A Guideline for the Prevention of Dust and Smoke Pollution from Land Development Sites in Western Australia (November 1996). Please note: The Department has recently |

| Emission | Sources | Potential pathways | Proposed controls |
|------------------|---|-------------------------|---|
| | | | published for consultation the draft Guideline: Dust emissions (DWER 2021) relating to the management and assessment of impacts from activities at prescribed premises. |
| Noise | Placement of bunding, drain covers and spill kits. Installation of ventilation and storage shelving in the warehouses. | Air / windborne pathway | <ul style="list-style-type: none"> Compliance with the <i>Environmental Protection (Noise) Regulations 1997</i>. |
| Operation | | | |
| Dust | Acceptance, handling, consolidation, treatment and storage of liquid and solid wastes | Air / windborne pathway | <ul style="list-style-type: none"> Dust/air checks will be conducted monthly and reported to DWER in the annual report and available onsite. <p>Please note: The Department has recently published for consultation the draft Guideline: Dust emissions (DWER 2021) relating to the management and assessment of impacts from activities at prescribed premises.</p> |
| Noise | Acceptance, handling, consolidation, treatment and storage of liquid and solid wastes | Air / windborne pathway | <ul style="list-style-type: none"> Compliance with the <i>Environmental Protection (Noise) Regulations 1997</i>. Site location within industrial zoning and unlikely to affect residential receptors due to proximity. Vehicles to be serviced/maintained and speed limits limited to (\leq 15km/h). Contractors advised not to idle vehicles if the premises is not open or to travel through residential areas located to the east of the site. Drum, IBC and receptacle crushing to only occur between 7am and 7pm within the processing building. The shredder will not have the capacity to process receptacles larger than a 200L steel or plastic drum. Material shredding to only occur between 7am and 7pm and will operate intermittently. Shredder will be housed in enclosed warehouse or processing area enclosed on three sides. Waste/materials dispatch to occur in operational hours between 7am and 7pm. Work instructions to be developed for the operation of all equipment and all operators trained. Noise checks will be conducted monthly |

| Emission | Sources | Potential pathways | Proposed controls |
|--|---|---|---|
| | | | and reported to DWER in the annual report and also available onsite. |
| Containment loss or spills to ground | Acceptance, handling, consolidation, treatment and storage of liquid and solid wastes | Seepage and run-off to soil and groundwater | <ul style="list-style-type: none"> • Processing conducted on a low-permeability concrete surface within a bunded area of the processing building. • No open drains/stormwater sumps in warehouses 1 and 2, one located in the processing building however this is not located in proximity to the processing area. • Gel pack bunds to be available near all onsite stormwater sumps and deployed over drains in the event of an emergency spillage where required. • Spillages will be cleaned up immediately using onsite spill kits (3x types) with collected waste disposed of to an appropriate facility. • All staff handling waste material to be appropriately trained. • Spill bund pallets will be used to capture leak, drips and spills from receptacles. • All incidents recorded in an incident register and reviewed by site supervisor. Staff are notified for improvement purposes during toolbox meetings. |
| Fugitive emissions to air of waste treatment by-products | Acceptance, handling, consolidation, treatment and storage of liquid and solid wastes | Air / windborne pathway | <ul style="list-style-type: none"> • Treatment processes developed, trialed and supervised by a chemist or trained operator. • Temperature and pH is monitored during treatment reactions. • Stabilisation treatments will occur in enclosed containers. • Appropriate training for all staff handling waste materials. |
| Fire/smoke | Fire/smoke in the event of a fire incident | Air / windborne pathway | <ul style="list-style-type: none"> • Fire hydrants, fire hose-reels, fire extinguishers and fire blankets available onsite. • Staff inducted on site emergency plan, fires safety and first aid. • Working instructions are followed for assessment, receipt and handling of chemicals. • No flammables to be stored in any of the warehouse buildings or processing building and in a dangerous goods rated self-bunded container prior to commencement |

| Emission | Sources | Potential pathways | Proposed controls |
|-----------------|--|--|---|
| | | | of operations. |
| Fire wash-water | Release of fire water in the event of fire extinguishing | Discharge to land and stormwater system Infiltration to groundwater | <ul style="list-style-type: none"> • Deployment of gel weighted drain covers over stormwater drains/sumps. • Use of spill kits where necessary. |

3.1.3 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the delegated officer has excluded the applicant's employees, visitors, and contractors 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 (*Guideline: Environmental Siting* (DWER 2020)).

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

| Human receptors | Distance from prescribed activity |
|--|---|
| Residential premises | Wattle Grove 300 m east and 600 m south of the premises boundary. Forrestfield 800 m east of the premises boundary. |
| Industrial premises (zoned general industry) | Immediately adjacent to the northern, eastern and southern boundaries and across Chisholm Crescent to the west |
| Environmental receptors | Distance from prescribed activity |
| Swan Coastal Plain geomorphic wetlands | Premises located within a multiple use palusplain area (covered by industrial area). Conservation palusplain 310 m west of the premises boundary (entirely covered by industrial site). Conservation palusplain 350 m north-east of the premises boundary. Tomah Road Swamp - conservation and multiple use sumpland 410 m south of the premises boundary. South Kewdale Yard – resource enhancement 430 m north-west of the premises boundary. |
| Underlying groundwater | Perth Groundwater Map indicates: <ul style="list-style-type: none"> - the depth to the superficial aquifer is about 6 m below ground level (13 m AHD). - the regional groundwater flow direction is south south-west towards the Canning River. - groundwater is fresh and suitable for groundwater bores. The relevant beneficial use of groundwater in this area is non-potable purposes at industrial and residential premises. Groundwater is also likely to support groundwater dependent ecosystems. |
| Bush Forever site | Bush Forever site 282 is 325 m south of the premises boundary. |
| TECs/PECs | The buffer areas for the following TECs/PECs were identified within 1 km of the premises: <ul style="list-style-type: none"> - 22 occurrences of the Priority 3 and endangered Banksia dominated woodlands of the Swan Coastal Plain north, east and south of the |

| | |
|-------------------------------|--|
| | <p>premises.</p> <ul style="list-style-type: none"> - Two occurrences of the endangered southern wet shrublands of the Swan Coastal Plain north-east of the premises. <p>Two occurrences of the endangered Banksia attenuate woodlands over species rich dense shrublands north-east of the premises.</p> |
| Threatened and priority flora | Three occurrences of threatened species and five occurrences of Priority 4 species recorded within 1 km of the premises boundary. |
| Threatened fauna | One occurrence of an endangered species (Carnaby's Cockatoo), one occurrence of a Priority 4 species (Quenda) and one occurrence of a Priority 3 species (Swan Coastal Plain shield-backed trapdoor spider) recorded within 1 km of the premises boundary. |

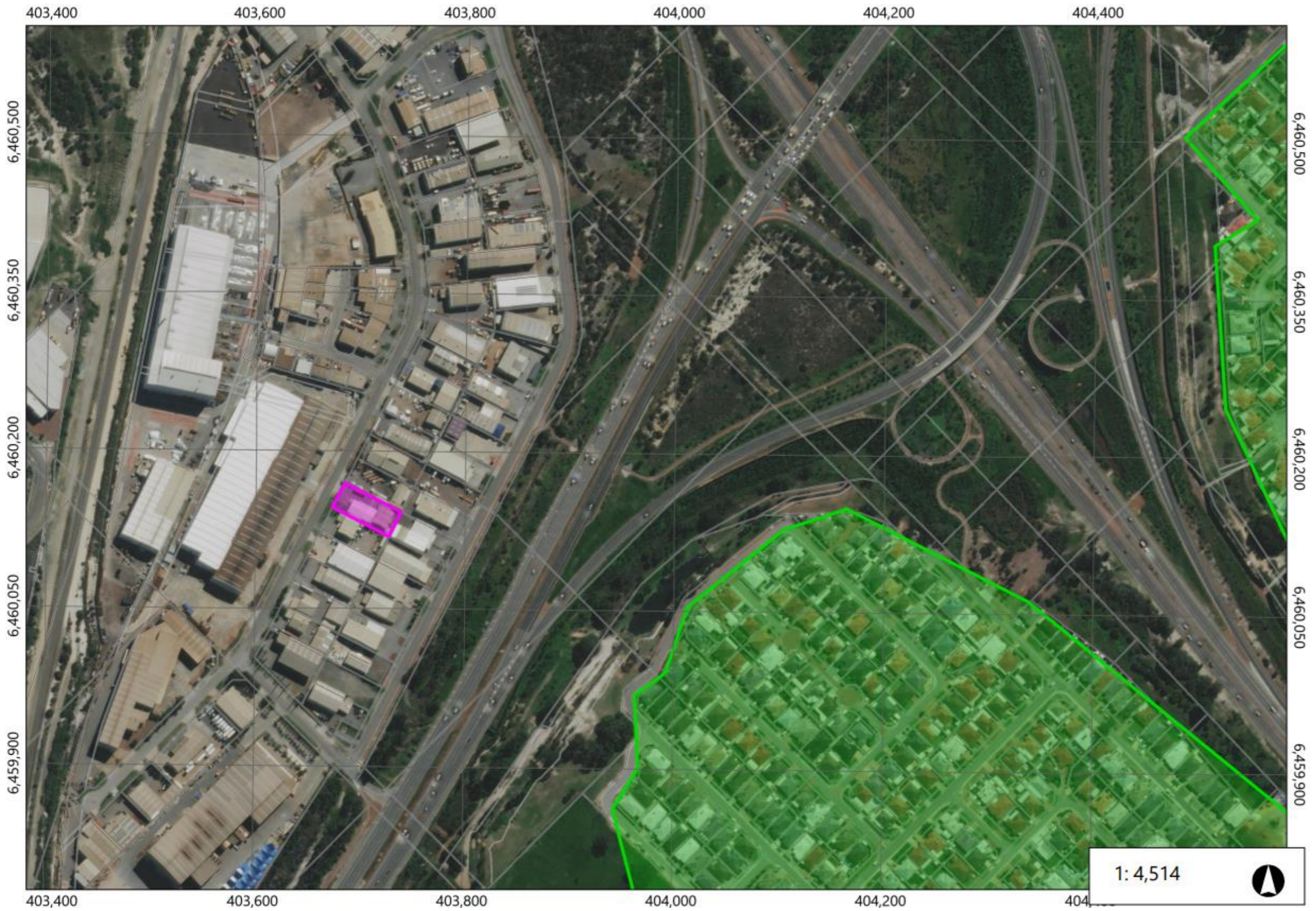


Figure 1: Proximity of sensitive human receptors to the prescribed premises boundary (pink). The green shaded area indicates the closest residential human receptors (Wattle Grove).

3.2 Risk ratings

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

Where the 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 W6546/2021/1 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 premises i.e. the acceptance, processing and consolidation of various solid and liquid waste materials 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 operation

| Risk events | | | | | Risk rating ¹ C=consequence L=likelihood | Applicant controls sufficient? | Conditions ² of works approval | Justification for additional regulatory controls |
|---|--------------------|---|---|----------------------|---|--------------------------------|--|---|
| Sources / activities | Potential emission | Potential pathways and impact | Receptors | Applicant controls | | | | |
| Construction | | | | | | | | |
| Placement of bunding, drain covers and spill kits | Noise | Air/windborne pathway causing impacts to health and amenity | Residences 300 m east | Refer to Section 3.1 | C = Slight L = Possible Low Risk | Yes | Premises construction is subject to the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations). | No regulatory controls have been added to the works approval as installation activities and vehicle movements onsite are not expected to generate unreasonable noise emissions and are subject to the Noise Regulations. |
| Installation of ventilation and storage shelving in the warehouses | Dust | | Neighbouring industrial premises | | C = Slight L = Rare Low Risk | Yes | | |
| Vehicle movements on the premises | | | | | | | | |
| Operation (including time-limited-operations operations) | | | | | | | | |
| Vehicle movements on the premises | Dust | Air/windborne pathway causing impacts to health and amenity | Residences 300 m east Neighbouring industrial premises | Refer to Section 3.1 | C = Slight L = Rare Low Risk | Yes | N/A | No regulatory controls have been added as the site is situated on sealed ground and waste storage and processing is occurring within enclosed buildings. |
| Operation of machinery and equipment | | | | | C = Moderate L = Possible Medium Risk | Yes | Premises operations are subject to the <i>Environmental Protection (Noise) Regulations 1997</i> . Condition 10, Table 4, 3(b), 4(a) Condition 11, Table 5, 18(d) Condition 18 Condition 19 Condition 20 Condition 21 | Conditions have been added as per the works approval holders proposed controls for noise emissions. The Delegated Officer considers additional regulatory controls are required for this risk event to ensure the operation of a shredder does not breach the assigned levels applicable to industrial areas in the Noise Regulations. As the applicant has not provided enough information to allow the Delegated Officer to adequately risk assess noise emissions associated with operating the proposed shredder, a noise assessment verification is considered necessary in ensuring compliance with the Noise Regulations. |
| Vehicle movements on the premises | Noise | | | | | | | |
| Operation of machinery and equipment incl. crushing of drums and material shredding | | | | | | | | |

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| Risk events | | | | | Risk rating ¹ C=consequence L=likelihood | Applicant controls sufficient? | Conditions ² of works approval | Justification for additional regulatory controls |
|---|--------------------------------------|--|--|----------------------|---|--------------------------------|---|--|
| Sources / activities | Potential emission | Potential pathways and impact | Receptors | Applicant controls | | | | |
| Acceptance, handling, consolidation, treatment and storage of liquid and solid wastes | Containment loss or spills to ground | Runoff to open sumps/drains or seepage through hardstand and infiltration to soil and groundwater causing impacts to groundwater quality | Down-gradient groundwater users and groundwater dependent ecosystems | Refer to Section 3.1 | C = Moderate L = Unlikely Medium Risk | Yes | <p>Condition 1, Table 1, 1(a), (b), 2(a), (b), (c), 4(c), 6(a), 7(a), 8(a), (b), (c), 9(a), (b)</p> <p>Condition 10, Table 4, 1(a), 2(a), 3(a), 5(a), 6(a), 7(a), (b), (c)</p> <p>Condition 11, Table 5, 1-15(e), 18(b)</p> | <p>The Delegated Officer considers additional regulatory controls are required for this risk event to prevent the likelihood of spills and containment loss of waste to environmental receptors. The following additional regulatory controls have been added into the works approval:</p> <ul style="list-style-type: none"> • The existing onsite concrete hardstand would typically meet a permeability equal to or less than 1×10^{-9} m/s. This requirement is necessary to ensure waste spills are unlikely to seep through the flooring surface prior to use of a spill kit. • The installation of non-permeable bunding with an increase in height around waste storage and processing areas in the processing building is considered necessary in containing possible waste spills from entering the onsite drainage sumps/soak-wells (50mm bunding height is required in the processing area and 25mm in the warehouses). • All storage shelving used for waste storage is to be capable of holding the intended load capacity weight as a collapse could lead to a major waste spill. • Bunded spill pallets to be suitably sized for the waste containers intended to be stored on it. • A requirement to position a gel weighted drain cover over the drain located in the processing building during operations is considered necessary due to its proximity to the storage and handling of waste in this area. |

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| Risk events | | | | | Risk rating ¹ C=consequence L=likelihood | Applicant controls sufficient? | Conditions ² of works approval | Justification for additional regulatory controls |
|---|---|--|---|----------------------|---|--------------------------------|---|--|
| Sources / activities | Potential emission | Potential pathways and impact | Receptors | Applicant controls | | | | |
| | Fugitive emissions to air of waste treatment byproducts | Air/windborne pathway causing impacts to health and amenity | Neighbouring industrial premises | | C = Moderate L = Unlikely Medium Risk | Yes | Condition 6, Table 2 Condition 11, Table 5, 1-15(g), (i) | Conditions have been added as per the works approval holders proposed controls for air emissions. |
| Fire incident during waste handling and storage | Fire, smoke and particulates | Air/windborne pathway causing impacts to health and amenity | Residences 300 m and 800 m east and 600 m south Neighbouring industrial premises | Refer to Section 3.1 | C = Major L = Unlikely Medium Risk | Yes | Condition 1, Table 1, 6(b) Condition 10, Table 4, 1(b) Condition 11, Table 5, 1-15(b), (h), (k), (l), 16(b), 18(e), 19(a) Condition 16 (a), (b) | Conditions have been added as per the works approval holders proposed controls for fire and associated emissions. The Delegated Officers considers an additional regulatory control necessary to ensure the works approval installs storage shelving that is non-flammable at the premises. |
| | Fire wash-water | Runoff to open sumps/drains or seepage through hardstand and infiltration to soil and groundwater causing impacts to groundwater quality | Down-gradient groundwater users and groundwater dependent ecosystems | | C = Major L = Unlikely Medium Risk | Yes | Condition 10, Table 4, 7(a), (b) Condition 16 (c), (d) | The Delegated Officer considers the following additional regulatory controls necessary in preventing the likelihood of fire-wash water containment loss and subsequent exposure to environmental receptors: <ul style="list-style-type: none"> In regulating similar premises that store and process potentially flammable wastes, the Department has previously required stormwater shut-off valves for stormwater drainage networks on prescribed premises. As this control is not proposed at this premises, the proposed gel weighted drain covers are to be positioned near all drainage sumps/soak-well on the premises to ensure prompt deployment in the case of a fire incident where required. Fire-wash water is also required to be contained as far as practicable and disposed of appropriately. |

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

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

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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 on 5 July 2021 | No comments received. | N/A |
| Local Government Authority – City of Kalamunda advised of proposal on 6 July 2021 (A2023693). | The City of Kalamunda replied on 10 August 2021 confirming that development application DA21/0277 for a change of use (use not listed) for a waste transfer station handling hazardous waste at 53 Chisholm Crescent, Kewdale was approved by the City (DWERDT488877). | Noted. |
| Department of Mines, Industry Regulation and Safety (DMIRS) advised of proposal on 6 July 2021 (A2023691). | <p>DMIRS replied on 22 July 2021 advising that dangerous goods officers attended the subject site on 15 July 2021 to gain a better understanding of the proposed operations and dangerous goods storage and handling arrangements onsite. Following on from this site visit, DMIRS advised that, at a minimum, the site is to ensure:</p> <ul style="list-style-type: none"> • The quantity of dangerous goods stored onsite must be kept below the manifest quantities outlined in Schedule 1 of the <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> for any dangerous good not on the current site dangerous goods site licence. • No flammable liquids are to be stored within warehouses 1, 2 or the processing building and is to be contained in an approved dangerous goods container as per the application. • The storage and processing areas currently allow for quantities of flammable liquids less than 250L. If this is to be exceeded, the fire resistance level of the fire walls and intervening doors and windows must be assessed accordingly. • The consolidation of small quantities of dangerous goods (flammable liquids and corrosives) is permitted in the processing area as per the current set up and construction of the processing and warehouse areas. | <p>DWER recognises that the proposed premises is subject to a range of requirements that are administered by DMIRS. DWER encourages the applicant to liaise directly with DMIRS to ensure compliance with all relevant dangerous goods requirements.</p> <p>Conditions have been added to the works approval regarding flammable liquid storage and non-compatible waste segregation as per DMIRS requirements.</p> |

| | | |
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| | <ul style="list-style-type: none"> • Transfer of dangerous goods in the “processing area” will be subject to an assessment of risk, with the appropriate identification of potential hazards and mitigation measures employed. The relevant Australian Standards should be consulted in particular for required distances to on-site protected places, segregation requirements for incompatible dangerous goods, spill containment measures, elimination of ignition sources, suitability of equipment for use in hazardous areas, appropriate selection of transfer equipment, development of associated transfer procedures and training of operators. • The proposed storage arrangements for dangerous goods must be aligned to the requirements of the <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> and is to be set up prior to the receipt of dangerous goods at the site. <p>(DWERDT481377).</p> | |
| Department of Fire and Emergency Services advised of proposal on 6 July 2021 (A2023692). | No comments received. | N/A |
| Applicant was provided with draft documents on 16 September 2021 (A2045516) and then a revised draft on the 15 October 2021 (A2054052). | Refer to Appendix 1. | Refer to Appendix 1. |

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.

References

1. DER July 2015. *Guidance Statement: Regulatory principles*. Department of Environment Regulation, Perth. Accessed at www.dwer.wa.gov.au
2. DER, October 2015. *Guidance Statement: Setting conditions*. Department of Environment Regulation, Perth. Accessed at www.dwer.wa.gov.au
3. DER, August 2016. *Guidance Statement: Licence duration*. Department of Environment Regulation, Perth. Accessed at www.dwer.wa.gov.au
4. DER, November 2016. *Guidance Statement: Environmental Siting*. Department of Environment Regulation, Perth. Accessed at www.dwer.wa.gov.au
5. DER, February 2017. *Guidance Statement: Risk Assessments*. Department of Environment Regulation, Perth. Accessed at www.dwer.wa.gov.au
6. DWER, June 2019. *Guideline: Decision Making*. Department of Water and Environmental Regulation, Perth. Accessed at www.dwer.wa.gov.au
7. DWER, June 2019. *Guideline: Industry Regulation Guide to Licensing*. Department of Water and Environmental Regulation, Perth. Accessed at www.dwer.wa.gov.au
8. DWER, July 2021. Draft Guideline: Dust emissions. Department of Water and Environmental Regulation, Perth. Accessed at <https://consult.dwer.wa.gov.au/regulatory-capability/draft-guideline-on-dust-emissions/>

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

| No. | Condition(s) | Summary of applicant's comment | Department's response |
|-----|---|---|--|
| 1. | Bunding height Condition 1, Table 1, Part 2 (b) | The applicant has advised that the installation of 25mm polyurethane bunding has the capacity to contain an IBC spillage in warehouses 1 and 2. As this polyurethane bunding is not available in heights larger than 25mm, the applicant has proposed the use of "smart bund" that is constructed of PVC and can be installed to a height of 50mm in the processing building. | The Delegated Officer considers the installation of 25mm polyurethane bunding in warehouses 1 and 2 sufficient in containing and preventing spill migration to other areas of the premises. Due to the smaller area within the processing building, the proposed PVC bunding with 50mm height is considered appropriate for spill management within this area in combination with the availability of spill kits and use of the gel weighted drain covers. The works approval has been updated to reflect these bunding requirements with removal of the reference to polyurethane to allow the applicant flexibility in selecting bunding materials to achieve the necessary permeability. |
| 2. | Building ventilation Condition 1, Table 1, Part 3 | The applicant has confirmed that the proposed ventilation units will be power operated and will provide active air extraction for the premises buildings. | The Delegated Officer has updated the building ventilation specifications in Table 1 of the works approval accordingly. |
| 3. | Proposed shredder equipment installation Condition 1, Table 1 | The applicant has not submitted application for a Category 47 – scrap metal recovery as scrap metal will not be recovered onsite. The applicant is proposing to obtain a Waste Industries WT4080 shredder (37kW motor, operating at 55 Amps) or similar model equivalent. The shredder will be used to downsize and consolidate cleaned and decontaminated plastic and metal drums/receptacles and IBC bladders. The shredder is not designed to process receptacles larger than a 200L steel or plastic drum. | For the purposes of Category 47 in the <i>Environmental Protection Regulations 1987</i> (EP Regulations), scrap is considered to include: 'discarded metal for reprocessing' and metal fragmenting defined as: 'to break or cause metal to break into fragments'. The use of a shredder to process metal receptacles at the premises is therefore considered to be a prescribed activity captured under Category 47. The threshold limit in the EP Regulations for a Category 47 is 100 tonnes or more per year, so if the site is proposing to process more than 100 tonnes of metal through the shredder in an annual period, category 47 will need to be considered as a part of the subsequent licence application. The Delegated Officer also considers the operation of a shredder having the potential to breach the assigned levels applicable to industrial areas in the <i>Environmental (Noise) Regulations 1997</i> (Noise Regulations). As the applicant has not provided enough information to allow the Delegated Officer to adequately risk assess noise emissions associated with operating the proposed shredder, a noise assessment verification is considered necessary in ensuring compliance with the Noise Regulations. |
| 4. | Pre-acceptance/post acceptance verification – "suitably qualified chemist" Condition 7 (b) Condition 8 (1 st draft) | The applicant considers the specification of a suitability qualified chemist to conduct verifications on waste material receipts very limiting on business and staffing operations. It is considered appropriate that this specification be updated to allow personnel that have other appropriate qualifications and/or undergone necessary training to be able to assess waste at the premises. | The Delegated Officer understands that this requirement would be restrictive on the premises and considers site personnel who have completed the necessary training and/or have applicable qualifications will be suitable in ensuring waste materials are assessed appropriately. The works approval has been updated accordingly to remove reference to a chemist and allow a 'suitably qualified person' who has the necessary skills and knowledge in waste assessments to conduct waste verification. |
| 5. | Post acceptance verification – liquid waste types Condition 8 (1 st draft) | The applicant considers this testing verification intensive and onerous for a small-scaled waste transfer operation. The applicant proposes to assess, verify and label waste before it is accepted from customers with random bench testing on liquid waste streams on an "as required basis" and also if there are any discrepancies detected. | The Delegated Officer understands that this testing verification condition may be excessive for the proposed operations at this smaller scale waste transfer station and accepts the applicant's proposed assessment and verification for waste acceptance at the premises. Should the operator adhere to the requirements in pre-acceptance verification as per condition 7, the operator should have all of the necessary information to determine the treatment and/or consolidation method required. Condition 8 has therefore been removed from the works approval. |
| 6. | Waste processing – "suitably qualified chemist" Condition 12 (1 st draft), Table 5, Part 1 (a) Condition 12 (1 st draft), Table 5, Part 19 (a) | As per section 4 above. | 'Suitably qualified chemist' has been updated to 'suitably qualified person' throughout the works approval and in the definition updated in Table 7. |
| 7. | Electronic waste storage specifications Condition 12 (1 st draft), Table 5, Part 16 (a) | The applicant has advised that electronic waste will be source separated and stored in appropriate receptacles provided by the recycler. Electronic waste with embedded batteries will be stored separately and other batteries stored in fire-proof lined receptacles. | The Delegated Officer has added these electronic waste specifications as conditions in Table 5 of the works approval. |

| No. | Condition(s) | Summary of applicant's comment | Department's response |
|-----|--|--|---|
| 8. | Tyre acceptance and transfer Condition 6, Table 3 Condition 12, Table 5 | The applicant has requested the storage of up to 99 tyres on the premises to be permitted under the works approval. Tyres will not be processed onsite and will be transported to other tyre recycling premises on a regular basis. | The Delegated Officer considers the acceptance of up to 99 used tyres on the premises acceptable and has added this waste type to Table 5 with associated storage fire prevention specifications in accordance with the Department of Fire and Emergency Services Guidance Note: GN02 – Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres. |
| 9. | Suitably qualified chemist Table 7 | The applicant has requested the term 'suitably qualified chemist' be modified to 'suitably qualified/experienced personnel'. Waste types will be assessed by chemist, experienced and/or qualified personnel to ensure that it can be accepted and managed at the premises in accordance with the works approval and Dangerous Goods requirements. | The Delegated Officer has updated the definition term 'suitably qualified chemist' to 'suitably qualified person' and specified less restrictive qualification and training requirements. It is considered necessary that onsite personnel assessing waste at the premises have a minimum of 2 years' experience in a waste related field and have the necessary skills and knowledge in processing and handling waste materials. |
| 10. | Additional waste acceptance Condition 6, Table 2, Table 3 | The applicant has noted that the following controlled waste tracking codes are missing from the waste acceptance Table 3 – D230 and D240. D140 is duplicated and is missing D130. The applicant has requested the addition of N120, N140, N150, N160, N190, N205, N220 and N230 to the works approval. These wastes will follow the same processes as other wastes in assessment, receipt, treatment, consolidation and storage. Section 3.6, Table 4 in the works approval application 'Attachments' document outlines the applicable treatment. | It is noted that these missing codes and the duplicated code are within Table 2 and not Table 3. D230, D240 and D130 have been included in Table 2 and the duplicated D140 has been removed as this is considered an administrative error. The Delegated Officer considers the addition N120, N140, N160, N190 and N205 acceptable as these waste types are similar to other waste types already included in the waste acceptance tables and will follow the similar assessment and treatment methods already proposed within the application. Therefore the addition of these waste types are not expected to alter the risk assessment. N150, N220 and N230 have not been added to the works approval as the Delegated Officer does not consider sufficient information has been provided for the acceptance, handling and treatment methods for these wastes which will likely alter the risk assessment, particularly for dust emissions relating to asbestos and fly ash waste. The works approval holder may apply for the inclusion of these waste types in a subsequent works approval amendment or licence application with this additional information, post granting of the operational licence. Please note, the department may seek additional comment/advice from the Department of Health in relation to the acceptance of asbestos wastes and ceramic based fibrous wastes that have similar physio-chemical characteristics to asbestos. |
| 11. | Waste reporting units Table 6 | The applicant has requested the units for reporting liquid and solid wastes be changed from "m ³ and tonnes" to m ³ and/or tonnes". | After review, the Delegated Officer considers for the purposes of reporting liquid and solid waste quantities to the Department, tonnes are the most appropriate unit of measurement in accordance with Category 61 and 61A throughputs for the premises. The applicant is advised that they may record waste inputs and outputs in m ³ however unit conversions to tonnes are considered appropriate when submitting reports to the Department. |
| 12. | Building bunding Table 4 (Works Approval), Table 3 (Decision Report) | The applicant has requested the reference to "polyurethane bunding" in Table 4 be changed to "Building bunding" The applicant has requested that point 2 in Table 3 on page 7 of this Decision Report be updated to reflect works approval conditions which require 50mm bunding in the processing area and 25mm bunding in warehouses 1 and 2. | In accordance with comments '1.' , above, the Delegated Officer considers these administrative errors and has corrected the Table 4 entry to "Building bunding" and the corresponding bunding height requirements in the Decision Report. |

Appendix 2: Application validation summary

| SECTION 1: APPLICATION SUMMARY (as updated from validation checklist) | | | | |
|---|---|--|---|-------------------------------|
| Application type | | | | |
| Works approval | <input checked="" type="checkbox"/> | | | |
| Licence | <input type="checkbox"/> | Relevant works approval number: | | None <input type="checkbox"/> |
| | | Has the works approval been complied with? | Yes <input type="checkbox"/> No <input type="checkbox"/> | |
| | | Has time limited operations under the works approval demonstrated acceptable operations? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| | | Environmental Compliance Report / Critical Containment Infrastructure Report submitted? | Yes <input type="checkbox"/> No <input type="checkbox"/> | |
| | | Date report received: | | |
| Renewal | <input type="checkbox"/> | Current licence number: | | |
| Amendment to works approval | <input type="checkbox"/> | Current works approval number: | | |
| Amendment to licence | <input type="checkbox"/> | Current licence number: | | |
| | | Relevant works approval number: | | N/A <input type="checkbox"/> |
| Registration | <input type="checkbox"/> | Current works approval number: | | None <input type="checkbox"/> |
| Date application received | 5 May 2021 | | | |
| Applicant and premises details | | | | |
| Applicant name/s (full legal name/s) | Westref Enviro Pty Ltd | | | |
| Premises name | Westref Enviro | | | |
| Premises location | Lot 244 on Plan 17127 | | | |
| Local Government Authority | 53 Chisholm Crescent, Kewdale | | | |
| Application documents | | | | |
| HPCM file reference number: | DER2021/000265 | | | |
| Key application documents (additional to application form): | <p>Overview of application</p> <p>Safe Work Procedures for Waste Acceptance, Waste Reveal and Chemical Safety</p> <p>Site Emergency Plan under preparation and to be submitted subsequently</p> | | | |

| SECTION 1: APPLICATION SUMMARY (as updated from validation checklist) | | |
|---|--|---|
| Scope of application/assessment | | |
| Summary of proposed activities or changes to existing operations. | New works approval: Placement of drainage covers, bunded pallets and spill kits at premises Installation of drive over bunding at warehouses Installation of ventilation and storage shelving in warehouses | |
| 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 | |
| Category 61 - Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated, | 3,000 tonnes per year | |
| Category 61A - Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land. | 3,000 tonnes per year | |
| Legislative context and other approvals | | |
| Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/> |
| Does the applicant hold any existing Part IV Ministerial Statements relevant to the application? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Ministerial statement No: EPA Report No: |
| Has the proposal been referred and/or assessed under the EPBC Act? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Reference No: |
| Has the applicant demonstrated occupancy (proof of occupier status)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Certificate of title <input type="checkbox"/> General lease <input checked="" type="checkbox"/> Expiry: 27/9/2022 Lessor is Brooklea Nominees Pty Ltd and lessee is Westref Pty Ltd – Westref Enviro are the sole subsidiary of Westref Pty Ltd. Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry: |
| Has the applicant obtained all relevant planning approvals? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | Approval: N/A Expiry date: N/A City of Kalamunda have confirmed an approval under the local planning scheme is in place for a Waste Transfer Station - 'use not listed'. |

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)

| | | |
|--|---|---|
| Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> | 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> | Application reference No: Licence/permit No: Licence / permit not required. |
| Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Name: Perth Groundwater Area – no proposed discharges but potential due to spill or fire incident Type: Proclaimed under RIWI Act Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Regional office: Swan Avon |
| Is the Premises situated in a Public Drinking Water Source Area (PDWSA)? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Name: N/A Priority: P1 / P2 / P3 / <u>N/A</u> Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>) | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | <i>Dangerous Goods Safety Act 2004</i> <i>Environmental Protection (Controlled Waste) Regulations 2004</i> |
| Is the Premises within an Environmental Protection Policy (EPP) Area? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Is the Premises subject to any EPP requirements? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Classification: N/A Date of classification: N/A |