



## Application for Works Approval

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

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<b>Works Approval Number</b>	W6668/2022/1
<b>Applicant</b>	Veolia Recycling and Recovery (Perth) Pty Ltd
<b>ACN</b>	118 828 872
<b>File number</b>	DER2014/002858-1
<b>Premises</b>	North Bannister Resource Recovery Park 6264 Albany Highway North Bannister WA 6390 Lot 2 on Plan 2767
<b>Date of report</b>	25 August 2022
<b>Decision</b>	Works approval granted

Abbie Crawford  
**A/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 operation of infrastructure on the premises. As a result of this assessment, works approval W6668/2022/1 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 16 December 2021, 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 works relating to an expansion of the Food Organics and Garden Organics (FOGO) processing facility at the premises, to include a screening plant. The acceptance of FOGO and operation of the interim FOGO facility were approved under an amendment to the premises' operational licence (L8871/2014/2) dated 2 December 2021. The premises is approximately 70 km south of Mount Magnet.

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 licence L8871/2014/1. This application is limited to proposed works relating to category 67A, compost manufacturing and soil blending activities at the premises, as defined in works approval W6668/2022/1. 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 W6668/2022/1.

The key aspects of the application include:

- Increase in the authorised rate of acceptance of FOGO from 10,000 tonnes per annum (tpa) to 40,000 tpa.
- Construction of a new asphalt hardstand adjacent to the existing organics/composting area.
- Addition of a concrete slab FOGO receival area with concrete push-up walls.
- Installation of fixed feed hopper and mobile trommel screen.
- Installation of four person picking station with conveyor stacker.

The application does not propose to increase the category 67A production capacity on licence L8871/2014/2 from the current assessed capacity of 100,000 tpa.

### 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 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
<b>Construction</b>			
Dust	Dust generated during earthworks from excavation and vehicle movements for installation of asphalt, concrete slabs and concrete drain.	Air / windborne pathway	Low intensity construction and dust suppression via wetting down where necessary.
Noise	Noise generated during earthworks from excavation and vehicle movements for installation of asphalt, concrete slabs and concrete drain.	Air / windborne pathway	The site is located approximately 4.4km from the nearest sensitive receptor. Low frequency sound reversing alarms.
<b>Operation</b>			
Dust (including bioaerosols)	Vehicle and equipment operation	Air / windborne pathway	No controls proposed by applicant.
Noise			Appropriate maintenance of all plant machinery and equipment. Low frequency sound reversing alarms. The premises is located within a rural area with a 4.4 km separation distance to the nearest human receptor, with hills and valleys between.

Emission	Sources	Potential pathways	Proposed controls
Dust (including bioaerosols)	FOGO receipt, composting and screening within the decontamination and composting area  Collection and storage of leachate and pumping to other leachate ponds	Air / windborne pathway	No controls proposed by applicant.
Leachate and firefighting wash waters		Stormwater potentially contaminated with organic waste residue from handling and storage operations and firefighting wash waters	The proposed new decontamination area and the existing compost hardstand areas all flow into two leachate ponds, which capture all contaminated surface water runoff.  Partially undercover storage and handling area limiting leachate potential through stormwater contact with FOGO.
Noise		Air / windborne pathway	Appropriate maintenance of all plant machinery and equipment is conducted on a regular basis  Low frequency sound reversing alarms  The premises is located within a rural area with a 4.4 km separation distance to the nearest human receptor, with hills and valleys between
Odour			FOGO material decontaminated with short residence time in the works approval area and blended with greenwaste and other organic materials to form the initial compost mix and commence the three to four week pasteurisation process (Stage 1), where the material is placed in a windrow and left for three to four weeks to rapidly breakdown the food organic fraction. During this period, air circulation is achieved via the mobile floor aeration (MAF) system. Compost batches are processed on the MAF system for three to four weeks. If an increased level of odour is observed, the MAF system will be expanded for use within Stage 2 of the composting process for a further three to four weeks.

### 3.1.2 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 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**

<b>Human receptors</b>	<b>Distance from prescribed activity</b>
Culford Agricultural Precinct Caretakers Residence	4.4km east of Premises boundary
Private residences – Plantation Road, Bannister	7km south-east of Premises boundary
Commercial premises - Sixty-four Mile Road, Bannister	8.9km south-east of premises boundary
Commercial premises - Shell Service Station and Three-ways Tavern	5.5km east- south-east of Premises boundary
Users of Bibbulmun Track – North Bannister Spur Trail (Transient receptor)	Directly adjacent to northern Premises boundary.
Proposed Richgro composting facility	Directly adjacent to the eastern Premises boundary. Proposed groundwater abstraction for composting process.
<b>Environmental receptors</b>	<b>Distance from prescribed activity</b>
Serpentine Dam Catchment Area - Priority 2 Public Drinking Water Source Area	Within Prescribed Premises boundary. N.B. Landfill footprint situated outside Serpentine Dam Catchment Area.
Serpentine Dam Catchment Area – Priority 1 Public Drinking Water Source Area	Directly adjacent to northern Premises boundary.
Bannister River	<p>Within Prescribed Premises boundary. Non-perennial watercourse flowing south-east through the Premises. Constructed dams have been established along its course to hold water onsite.</p> <p>Flows to the Murray River, which discharges to Peel-Harvey Estuary.</p>
Gringer Creek	<p>Minor river, tributary to Bannister River</p> <p>Approximately 6km to the south-east of the Premises boundary.</p> <p>Flows to the Bannister Rive, which ultimately discharges to the Peel-Harvey Estuary via the Murray River.</p> <p>Closest RAMSAR listed wetland is the Peel-Yalgorup system, located 57 km west of the Premises.</p>
Serpentine River	<p>Non-perennial tributary located adjacent to northern Premises boundary. A constructed dam has been built to retain surface water onsite. Prescribed premises is situated outside catchment area</p> <p>Main river channel located 3.4km north-west of prescribed premises boundary</p>

	Ultimately discharges to Peel-Harvey Estuary via the Serpentine River.
Groundwater	<p>Premises is situated atop groundwater resource area – Karri, Karri, Combined – Fractured Rock West - Alluvium</p> <p>The depth to groundwater varies across the site ranging from 1.5 to 20.5 meters below ground level (mbgl) (319 to 345 mAHD).</p> <p>Well and borehole drilling indicates the presence of an unsaturated zone between the landfill liner and groundwater.</p>
Dwellingup State Forrest - C42	<p>Remnant native vegetation</p> <p>Directly adjacent to northern and western Premises boundaries</p>
Beelaring Class C Nature Reserve	<p>Remnant native vegetation</p> <p>Immediately to the north and west of premises boundary</p>
Threatened fauna	Scattered records as close as 700m east-northeast of Premises boundary

## 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 W6668/2022/1 that accompanies this decision report authorises construction only. 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 to authorise emissions associated with the ongoing operation of the premises i.e. FOGO decontamination activities. 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 Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
<b>Construction</b>								
Construction of the new hardstands and drain Installation of trommel and picking station	Dust	Air / windborne pathway causing impacts to health and amenity	Closest sensitive receptor 4.4 km east from the premises	Low intensity construction and dust suppression via wetting down where necessary	C = Minor L = Unlikely <b>Medium Risk</b>	Y	None Specified	N/A
	Noise			Low frequency sound reversing alarms.	C = Minor L = Unlikely <b>Medium Risk</b>	Y		N/A
<b>Operation</b>								
Truck unloading, storage and composting of 40,000 tpa of FOGO waste	Odour	Air/windborne pathway causing impacts to health and amenity	Closest sensitive receptor 4.4 km east from the premises	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	No operational works approval conditions applied as activities are covered under the following licence conditions: Condition 1 Table 1.1 Condition 12 Table 4.1 rows 9, 10 & 11. Condition 21, Table 9 row 2 Condition 26, Table 12 rows 1 & 3. Condition 30, Table 13 row 5 Condition 35.	The separation distance of 4.4 km to the nearest receptor is considered adequate for the mitigation of impacts from acceptance of FOGO waste. The Delegated Officer considers that the existing licence conditions will adequately address any potential odour issues.

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	Noise associated with machinery operation			Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	No operational works approval conditions applied as activities are covered under the following licence conditions: Condition 23, Table 10, row 1 Condition 35 Condition 38, Table 16 row 9	Premises operations are subject to the Environmental Protection (Noise) Regulations 1997.
	Windblown waste	Air/windborne pathway causing impacts to amenity	Closest sensitive receptor 4.4 km east from the premises  Dwellingup State Forest	Cyclone fence surrounds the premises. Picking station waste bunkers are covered in mesh.	C = Minor L = Unlikely <b>Medium Risk</b>	Y	Works approval condition 1.	N/A
	Leachate	Runoff causing ecosystem disturbance or via seepage (infiltration) impacting underlying	Serpentine Dam Catchment Area - Priority 2 Public Drinking	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Works approval condition 1 No operational conditions applied as activities are covered	Existing composting hardstand and retention pond construction in accordance with license condition 6. Existing conditions in the Licence ensure a minimum freeboard is maintained and

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Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
		groundwater. Potential for impacting the public drinking water catchment	Water Source Area				under Licence Conditions 17, 18, 19, 21, 23, 36, 38 & 39	the pond lining permeability is less than $1 \times 10^{-9}$ or equivalent.
Use of final composted product offsite	Contamination or not 'fit for purpose' compost product	Discharge of contaminants to land through application of contaminated products.	Any receiving environment of the composted product	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Licence Condition 1 Table 1.1- ii	Licence condition added to ensure that FOGO waste will not contain more than 10% non-organic content prior to acceptance

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.

## 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 8 July 2022	No submissions received	N/A
Applicant was provided with draft documents on 01/08/2022	1. The Applicant requested a name change on Page 1 to reflect the purchase of SUEZ by VEOLIA.	Change applied as requested.
	2. The Applicant requested a change in the fall of the hardstand drainage channel from 1 in 40 to 1 in 100; in Condition 1, Table 1.	Deemed no change to environmental risk profile and change applied as requested.
	3. The leachate lagoons referenced in Condition 1, Table 1 were named Ponds 2 and 4 in error from previously submitted, outdated diagrams. The Applicant requests correction to Ponds A and B.	Change applied as requested.

## 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 of the proposed infrastructure. However, it does not authorise the increase in the FOGO feedstock. Licence L8871/2014/2 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 L8871/2014/2 can be submitted at the same time as the Environmental Compliance Report (as required by Condition 2 of this works approval).

## Appendix 1: Application validation summary

Works approval	<input checked="" type="checkbox"/>					
Licence	<input checked="" type="checkbox"/>	Relevant works approval number:		None	<input type="checkbox"/>	
		Has the works approval been complied with?			Yes	<input type="checkbox"/>
		Has time limited operations under the works approval demonstrated acceptable operations?			Yes	<input type="checkbox"/>
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?			No	<input checked="" 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		16 December 2021				
<b>Applicant and Premises details</b>						
Applicant name/s (full legal name/s)		SUEZ Recycling & Recovery (Perth) Pty Ltd				
Premises name		North Bannister Resource Recovery Park				
Premises location		Lot 2 on Plan 2767 Albany Highway 6364 Albany Highway, North Bannister WA 6390				
Local Government Authority		Shire of Boddington				
<b>Application documents</b>						
HPCM file reference number:		DWERDT40149				
Key application documents (additional to application form):		Nil				
<b>Scope of application/assessment</b>						

Summary of proposed activities or changes to existing operations.	Construction of a processing facility for the decontamination of food organics, garden organics (FOGO) waste. Plant is a screening/picking conveyor with manual and mechanical sorting on concrete hardstand.
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**Category number/s (activities that cause the premises to become prescribed premises)**

**Table 1: Prescribed premises categories**

Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity associated with new infrastructure under works approval
Category 67A: <i>Compost manufacturing and soil blending: premises on which organic material (excluding silage) or waste is stored pending processing, mixing, drying or composting to produce commercial quantities of compost or blended soils.</i>	100,000t, including 10,000 t/yr FOGO	100,000t, including 40,000 t/yr FOGO

**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 type="checkbox"/> Expiry: 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: 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 <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"/>	Type: Proclaimed Groundwater Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Name: Serpentine Dam Catchment Area Priority: 1 and 2 Are the proposed activities/landuse compatible with the PDWSA (refer to <a href="#">WQPN 25</a> )? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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"/>	The landfill and composting operations include receipt of controlled waste and dangerous goods. See licence: L8871/2014/1
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A

<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Classification: listed in DWERS Geocortex viewer as</p> <p>OBJECTID 57276</p> <p>CSS_ID 64381</p> <p>CSS_SITE_ID 8993</p> <p>Date of classification: Incomplete Report</p> <p>Trim ID- DER2014/2437</p>
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