



Application for Works Approval

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

Works Approval Number	W6947/2024/1
Applicant	Veolia Recycling & Recovery Pty Ltd
ACN	002 902 650
File number	DWERVT15937
Premises	Landsdale Resource Recovery Park 15 Attwell Street, LANDSDALE WA 6065 Legal description Lot 79 on Diagram 57260 As defined by the premises maps attached to the issued works approval
Date of report	10 January 2025
Decision	Works approval granted

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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 the premises. As a result of this assessment, works approval W6947/2024/1 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

Landsdale Resource Recovery Park (the premises) currently operates as a solid waste depot under Licence L8477/2010/2. The premises is located in the Landsdale Industrial Area at 15 Attwell Street, Landsdale, approximately 20 kilometres north of the Perth CBD. The premises is licenced to receive a combined total of 165,000 tonnes of solid waste annually.

On 20 May 2024, Veolia Recycling & Recovery 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).

The application relates to construction works relating to the expansion of the existing transfer station to the north and south to increase the floor capacity for the segregation of the various waste types.

The proposed activities include the following:

- Expanding the transfer station to the south and north to increase the floor capacity;
- Remove and replacement of portions of the existing concrete floor to drain the floor to a sealed sump;
- Fully enclosing the existing and expanded transfer station building;
- The installation of an air control system, including a 17.5 m high air extraction stack; and
- The receipt of 30,000 tonnes per annum of Food organics and garden organics (FOGO).

The expanded facility operation will be similar to the operation of the existing facility, with waste delivery vehicles entering the waste transfer station via the north-eastern entrance access ramp, entering the facility and tipping the waste in the nominated location and departing the site via the southern exit. The primary difference being that the facility will be fully enclosed with interlocked rapid opening/closing roller doors and will be accepted 30,000 tonnes per annum of FOGO. The proposal does not include any increase to the overall quantity of material being received on the premises

Municipal solid waste, green waste and FOGO will be received within an enclosed building equipped with two large fast-acting doors (Door 1 and Door 4) for collection trucks entrance and exit from the building. The loading area will also be entirely enclosed with two fast-acting doors at each end of the loading tunnel (Door 2 and Door 3). The bulk air of the building and the loading tunnel will be extracted and directed to the stack(s) to be emitted to the atmosphere without any odour treatment. The stack air emission height (17.5 m) and air exit velocity (20 m/s) are designed to ensure that the odourous air is well mixed on exiting the stack to provide

adequate dilution of the odourous air and to prevent any possible wake effect and downwash. As stated by the applicant, there is no detailed air extraction design or multi-fan extraction system to ensure continuous operation in the event that a fan fails and needs to be replaced, and the facility will include a single or double stack, depending on the construction contractor's final design configuration.

The premises relates to the category and assessed production / design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W6947/2024/1. 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 W6947/2024/1.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *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. 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
Construction			
Dust	construction works relating to expansion of existing transfer station and installation of an air control system, including a 17.5 m high air extraction stack.	Air / windborne pathway	The construction process will involve the continuation of dust suppression activities, such as the hosing down of work areas.
Noise			No controls proposed.
Odour			No controls proposed.
Time limited operation			
Dust	Acceptance, handling and storage of FOGO and other waste	Air / windborne pathway	<p>The processing activities will occur in fully enclosed buildings with rapid opening/closing roller doors.</p> <p>The proposed air extraction system to be included an air filtration system to remove the dust before it is ejected out of the stack.</p> <p>The proposed air extraction system will have the ability to increase the fan extraction rate in the event that there is excessive dust in the building.</p> <p>The rapid opening/closing roller doors will be capable of being manually operated in the event of a power disruption.</p>

Emission	Sources	Potential pathways	Proposed controls
Noise		Air / windborne pathway	<p>The processing activities will occur in fully enclosed buildings with rapid opening/closing roller doors.</p> <p>All activities on site are to be carried out in accordance with the <i>Environmental Protection (Noise) Regulations 1997</i></p> <p>The facility currently operates between 5.00 am and 5.00 pm Monday to Friday and between 5.00 am and 12.pm on Saturday.</p> <p>If significant noise is generated, noisy operations will be ceased.</p>
Odour		Air / windborne pathway	<p>The processing activities including the transfer trailer loadout bay will occur in fully enclosed buildings with rapid opening/closing roller doors.</p> <p>The rapid opening/closing roller doors will be capable of being manually operated in the event of a power disruption.</p> <p>The building will have its air mechanically renewed through two mechanical ventilation units (MVU) pushing the untreated air to atmosphere via the stack(s).</p> <p>Negative pressure will be maintained within the building via louvers for ingress of fresh air within the building when no door is open.</p> <p>A differential pressure gauge will be installed at each personnel access door to visually check the presence of negative pressure.</p> <p>This negative pressure will also be continuously monitored via a Supervisory Control and Data Acquisition (SCADA) system.</p> <p>Air will be emitted at the stack(s) of minimum 17.5 m.</p> <p>Approximately 3 air exchanges per hour during operating hours and 1 air exchange per hour outside of operating hours.</p> <p>The fast-acting Doors 1 and 4 will be interlocked. Door 2 will be interlocked with all other doors.</p> <p>Reduced surface area of waste in contact with air will also include maintaining the floor as clean as possible at the end of each day.</p> <p>The building floor will be cleaned with high pressure water as required.</p>

Emission	Sources	Potential pathways	Proposed controls
			<p>The loading tunnel will be swept every day.</p> <p>Municipal solid waste, green waste and FOGO will be removed from the building within 24 hours except for long weekends or public holidays (48 hours).</p> <p>The odorous load will be loaded as soon as possible in a transfer trailer and removed from site.</p> <p>Abnormally odorous stockpile will be removed as soon as possible.</p>
Windblown waste		Air / windborne pathway	<p>The processing activities including the transfer trailer loadout bay will occur in fully enclosed buildings with rapid opening/closing roller doors.</p> <p>The rapid opening/closing roller doors will be capable of being manually operated in the event of a power disruption.</p> <p>Maintain the enclosed building under a negative pressure (-5 pa).</p>
Liquid waste – liquid runoff from fire washwater, (in the event of a fire incident), leachate and washdown water		Overland runoff Direct seepage to ground,	<p>Concrete hardstand with hump kerbs at all entrances will prevent surface water escape from the building.</p> <p>This liquid waste will be directed to one of two sealed washdown sumps within the building.</p> <p>The sealed washdown water sumps will be sized to cater for a minimum of 3 m³ each (1.8 m diameter x 1.2 m deep). The two sumps will be able to cater for at least 2 hours' flow of washdown water.</p> <p>In the event of a fire, the fire washwater will initially be collected within the sealed washdown water sumps. Once full, the fire washwater will fill the floor area in the enclosed building before entering the firewater runoff sump inlet and flowing into one of the two below-slab storage reservoirs.</p> <p>The northern reservoir has a storage capacity of approximately 160 m³ and the southern reservoir 250 m³, providing a total of approximately 410 m³ of below-slab storage.</p> <p>As a total, the proposed sumps, floors and reservoirs are designed to store an approximate combined capacity of 500 m³.</p> <p>The accumulated liquid wastes are to be removed immediately via vacuum truck and disposed of off-site.</p>

Emission	Sources	Potential pathways	Proposed controls
Liquid waste – contaminated stormwater		Overland runoff Direct seepage to ground,	The proposed enclosed building will prevent any stormwater contact with waste materials. All stormwater generated within the premises will be directed to the site stormwater system.
Fire related emissions – smoke and embers		Air / windborne pathway	<p>During operating hours operations staff will immediately take action to extinguish any fires; The site has existing firefighting capacity, including fire hydrants, hose reels and fire extinguishers.</p> <p>The existing and proposed building extension and enclosed areas will include a dual fire detection system (temperature and smoke sensors) with automatic callout to the local fire brigade.</p> <p>Appropriate separation of different types of materials.</p> <p>Rapid transfer of materials out of the facility.</p> <p>Remove flammable material from site as soon as possible after receipt.</p> <p>The existing licence includes various controls for the management of potentially fire related emissions.</p>

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 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
Commercial premises	Immediately adjacent the premises to the North, South, East and West
Residential premises	Approximately 550 m south of premises and 900 m east
Environmental receptors	Distance from prescribed activity
Underlying groundwater	Approximately 11 metres below ground level
Banksia Woodlands of the Swan Coastal Plain - Priority 3 Endangered ecological community	Approximately 250m southwest



Figure 1: Distance to sensitive receptors

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IR-T13 Decision report template (short) v3.0 (May 2021)

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 0. 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 0), 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 W6947/2024/1 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 operation of the premises. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

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

Risk events					Risk rating ¹	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Construction								
Construction works relating to expansion of existing transfer station and installation of an air control system, including a 17.5 m high air extraction stack.	Dust	Air / windborne pathway causing impacts to health and amenity	Residential premises ~550 m south and 900 m east of premises Commercial premises immediately surrounding the premises	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	N/A	The Delegated Officer considers that the Applicant's proposed infrastructure and management controls are likely to be sufficient at mitigating dust and noise emissions during construction.
	Noise			Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	N/A	
	Odour			Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	N/A	The Delegated Officer considers that odour emissions during construction works can be effectively regulated by the general provisions of the EP Act.
Time-limited-operations								
Acceptance, handling and storage of FOGO and other waste	Dust	Air / windborne pathway causing impacts to health and amenity	Residential premises ~550 m south and 900 m east of premises Commercial premises immediately surrounding	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 1, 2, 3, 6,7, 9 and 14	The applicant states the air control system filter will remove dust prior to being emitted from the stack. The Delegated Officer considers that the Applicant's proposed controls and infrastructure are likely to be sufficient at mitigating dust emissions.

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Risk events					Risk rating ¹	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
	Noise	Air / windborne pathway causing impacts to health and amenity	the premises	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 1, 2, 3, 6, 7, 9 and 14	Applicant proposed infrastructure and controls are likely to be sufficient at mitigating noise emissions during time limited operation. The delegated officer considers noise emissions can be effectively regulated by the Environmental Protection (Noise) Regulations 1997.
	Odour	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	See detailed risk assessment outlined in Section 3.3.			
	Windblown waste	Air / windborne pathway causing impacts to health and amenity	Residential premises ~550 m south and 900 m east of premises Commercial premises immediately surrounding the premises	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Condition 1, 2, 3, 6, 7, 9 and 14	The Delegated Officer considers that the Applicant's proposed infrastructure and management controls are likely to be sufficient at mitigating noise emissions windblown waste.
	Fire related emissions –	Air / windborne	Residential premises	Refer to Section	C = Severe	Y	Condition 1, 2, 3, 6, 7, 9	The Delegated Officer considers that the applicant's

Risk events					Risk rating ¹	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
	smoke and embers	pathway causing impacts to health and amenity	~550 m south and 900 m east of premises Commercial premises immediately surrounding the premises	3.1	L = Rare High Risk		and 14	proposed controls and the current fire management strategy/conditions within the existing licence L8477/2010/2 are likely to be sufficient at mitigating the risk of fire.
	Liquid waste – liquid runoff from fire washwater, contaminated stormwater (in the event of a fire incident), leachate and washdown water	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality. Subsurface seepage	Residential Premises ~550 m south of Premises Commercial Premises immediately adjacent to Premises Endangered ecological community ~ 250m southwest	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1, 2, 3, 6, 7 and 14	The liquid waste (washdown water, leachate and fire washwater) capacity of the proposed building designed to accommodate 500 m ³ of runoff water. The Delegated Officer considers that the applicant's proposed infrastructure and the current firewater management strategy/conditions within the existing licence L8477/2010/2 are likely to be sufficient at mitigating emissions from from fire washwater, contaminated stormwater, leachate and washdown water.

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.

3.3 Detailed risk assessment odour emissions

3.3.1 Description of potential adverse impact from the emission

Odour emissions during Landsdale Resource Recovery Park's operations will mainly arise from the proposed activity of receipt of 30,000 tonnes per annum of FOGO and other waste types that are currently accepted under Licence L8477/2010/2. The site currently receives approximately 75,000 tonnes per annum of putrescible waste, clean fill, inert waste type 1 and 2 and about 40,000 tonnes per annum of green waste.

Exposure to nuisance odour may affect general quality of life and wellbeing (amenity) leading to disturbance of normal day to day work activities in the surrounding industrial and residential area.



Figure 2: Locations of other odour emitters in the vicinity of the Veolia LRRP

3.3.2 Odour assessment

OPAM Consulting was engaged by Veolia Recycling & Recovery Pty Ltd to undertake an odour risk assessment for odourous air emissions from the proposed facility expansion as a result of the handling of FOGO material. The odour risk assessment was consisted with screening analysis, Operational Odour Analysis (OOA), location review, Odour Complaint Review, Odour Field Assessments (OFA) and Odour Patrols (OP).

The odour risk assessment findings included;

- The location review revealed that there are no critical aspects related to the terrain, neighbourhood or meteorological conditions that would likely increase the risk of odour impacts.
- There was only one odour complaint (March 2019) received in the eight years of premises activity.
- The OFAs and OPs revealed that the current odour footprint of the facility is up to 700 m under the current site configuration.
- The proposed building will be enclosed with fast-acting doors that will be interlocked to avoid large fugitive emissions under some specific wind conditions.

- Extracted air will be emitted to the atmosphere via a stack(s) designed to avoid some wake effect and downwash effects, therefore avoiding the risk of close and odorous ground level impacts.
- The outcomes from the use of these tools and commitment taken by Veolia confirm that the risk of odour impact for the future operation combined with the existing operations will be low and acceptable from an amenity point of view in this industrial area.
- Veolia is committed to investigate alternative and/or additional controls and corrective actions should those post-commissioning assessments show higher impacts or should odours from the activity be recognised at the current odour footprint distance or beyond.

The department acknowledged that the efforts by the proponent to reduce odour emissions. However, it was further determined that following information gaps in the odour risk assessment.

Key findings:

1. As the proposed facility does not use scrubbing to treat odorous air, the net odour emission rate from the site is likely to increase rather than decrease with the acceptance of the FOGO waste stream, assuming all other operational parameters remain similar.
2. A lack of clarity regarding the impact on building negative pressure of the south trailer loading being undertaken with an open door.
3. The stack is not adequately designed to avoid building downwash. The acceptable stack height to avoid building downwash is 2.5 times the height of the nearby building (reference: *USEPA Good Engineering Practice Guide, 1985*).
4. The ORA considers only the potential impact of an additional 30 ktpa FOGO material on odour impacts, which would increase the total throughput from approximately 115 ktpa to 145 ktpa. However, the potential odour impacts of the facility operating at full licenced capacity (165 ktpa) has not been considered.
5. There are a number of other odour-generating industries within a radius of several hundred meters and the odour risk assessment did not consider the cumulative impact of the odour generated by all industries.
6. A single odour patrol was undertaken during daytime hours with significant cloud-cover during a period when no trucks entered or left the site, meaning that the emissions and field impacts may not have been representative.
7. The department notes that the use of an odour intensity scale will be beneficial for future field studies.
8. The delegated officer has determined that the overall odour emissions may increase beyond the current odour levels specified in the odour risk assessment report. Additional odour management conditions may be imposed once the licence is amended if the odour field assessment indicates the need for further controls.

The Delegated Officer notes that the detailed design of the air extraction system has not been finalised and that multi-fan extraction system has not been proposed to ensure continuous operation in the event that a fan fails and requires replacement.

3.3.3 Applicant proposed controls

Section 3.1.1 details the control measures the applicant has proposed to assist in controlling odour emissions.

3.3.4 Consequence

Given the proximity of residential and industrial receptors, the Delegated Officer has determined that the impact of odour emissions could have high-level off-site impacts to amenity. Therefore, the Delegated Officer considers the consequence of odour emissions to be **Major**.

3.3.5 Likelihood of risk event

Based on the applicant's proposed controls, the Delegated Officer has determined that impacts from odour emissions could occur at some time. Therefore, the Delegated Officer considers the likelihood of impacts to the human and environmental health to be **Possible**.

3.3.6 Overall rating of odour risk

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

3.3.7 Regulatory control

In considering the findings of the risk assessment for overall odour emission from the site operations, the Delegated Officer considers the additional regulatory controls listed in Table 4 are necessary to address the uncertainties.

Table 4: Summary of additional regulatory controls for odour emission

Condition number	Regulatory control
Condition 1 Table 1	Additional design and construction requirements include the requirement for the hardstand to meet a coefficient of permeability of 1×10^{-9} m/s or less, as well as the requirement for an air venting stack/s height to be 2.5 times the building's height.
Condition 2 and 3	Submission of an Environmental Compliance Report following the completion of construction requirements, including certification by a suitably qualified professional engineer;
Condition 6 Table 2	Operational requirements of the proposed enclosed transfer station and air control system have been included in the works approval
Condition 10 and 11	Odour monitoring requirements have been included in the works approval, including the requirement to undertake three odour field assessments, develop an odour field assessment report and to compare results against previous odour field assessments undertaken.
Condition 14	Complaint recording and reporting requirements have been included in the works approval.

4. Consultation

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

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 6 August 2024	None received	N/A
Local Government Authority advised of proposal on 26 August 2024	The City of Wanneroo stated that the city granted conditional development approval for the subject land on 19 November 2013. The city also confirmed that proposed construction works required additional development approval, and they confirmed a development application has been received on the site by the city. However, the city was reluctant to support the proposed works approval application in the absence of an approved development application on the site.	The Delegated Officer noted the city's comment and determined that obtaining all the relevant statutory approval is an applicant's responsibility. The delegated officer recommends Veolia obtains development approval from the city of Wanneroo.
Applicant was provided with draft documents on 10 January 2025	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. 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.
4. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: air emissions*, Department of Water and Environmental Regulation, Joondalup, WA.
5. OPAM Consulting, VEOLIA Landsdale Resource Recovery Park Works Approval Application for FOGO Receiving and Transfer - Odour risk assessment -15 Attwell Street, Landsdale, Perth, Western Australia.

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

Condition	Summary of applicant's comment	Department's response
Condition 1 Table 1, Item 1	The works approval holder was requested to remove the reference to firewater collection reservoir capacity from the works approval because the final capacity will be determined by detailed design of the fire suppression system.	Not actioned as requested. The delegated officer notes that the risk assessment undertaken was based upon the storage volumes within the application package. Any deviation from the authorised construction and design requirements of the firewater collection reservoir capacity should be documented in the environmental compliance report.
Condition 1 Table 1, Item 1	The works approval holder provided the final height for the proposed air venting stack.	The condition 1 and figure 3 have been updated to reflect the provided information.
Decision report – section 3.3.3: key findings No 1	The works approval holder requested the key finding of the decision report reflect their intention to accept FOGO in substitution for greenwaste, not in addition to the current greenwaste volume.	The decision report has been amended to fix the administrative error.