



Licence

Environmental Protection Act 1986, Part V

Licensee: Tyrecycle Pty Ltd

Licence: L8694/2012/2

Registered office: 30-58 Encore Avenue
Somerton VIC 3062

ACN: 085 545 053

Premises address: Tyrecycle
10 Keegan Street
O'CONNOR WA 6163
Being Lot 94 on Plan 6759, and Lot 95 on Plan 6759 as depicted in
Schedule 1.

Issue date: Tuesday, 1 March 2016

Commencement date: Monday, 14 March 2016

Expiry date: Sunday, 13 March 2022

Prescribed premises category

Schedule 1 of the *Environmental Protection Regulations 1987*

Category number	Category description	Category production or design capacity	Approved Premises production or design capacity
57	Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.	100 tyres or more	5,000 tyres at any time
61A	Solid Waste Facility: Premises on which waste is stored, or sorted, pending final disposal or re-use.	500 tonnes or more per year	25,000 tonnes per annual period

Conditions

This Licence is subject to the conditions set out in the attached pages.

Date signed: 1 March 2016

.....
Alan Kietzmann
Manager Licensing, Waste Industries
Officer delegated under section 20
of the *Environmental Protection Act 1986*



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Introduction

This Introduction is not part of the Licence conditions.

DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.



You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.

Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

Licence fees

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

Ministerial conditions

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

Premises description and Licence summary

Tyrecycle Pty Ltd is an Australian company involved in the processing of recyclable tyres. Tyrecycle has been operating since 1992 and has operations in every State and Territory within Australia. The premises is located within the City of Fremantle in an area zoned as Industrial. The nearest residents are located approximately 220 meters north, 550 meters south, 450 meters south-east, 790 meters east and 450 meters south-west of the premises.

The premises is located within the Tamala Limestone formation, and therefore soils at the premises are expected to be quartz sands overlying limestone. Department of Water's Perth Groundwater Atlas indicates that groundwater is found approximately 37.5 meters below ground level. Water quality beneath the site is expected to have a total dissolved salts (TDS) value of 500-1000 mg/L indicating freshwater quality. The premises is not located in a Public Drinking Water Source Area. No surface water bodies are located within a 1 kilometre radius of the site.

The process at the premises involves shredding and screening used tyres into four inch chips. Any tyres that are found suitable for retreading will be stored separately in a dedicated storage area where they will then be loaded into shipping containers and removed off-site. Tyres for shredding are unloaded directly from the truck onto a conveyor belt which feeds directly into the primary shredding loop. This reduces the need to store these tyres for an extended period. Tyres intended for shredding will only be stored in the event of machinery breakdown. The primary shredding loop consists of a slowly rotating dual shaft shredder followed by an external classification screen, and the product is transferred using belt conveyors. The large oversize pieces are returned to the shredder for further processing while the medium undersized pieces are sent on to the next stage of the process, the secondary loop.

The secondary loop consists of a slowly rotating dual shaft shredder (with smaller blades than the primary shredder) followed by an external classification screen. Product is transferred using belt conveyors. The medium oversize pieces are returned to the shredder for further processing while the small undersized pieces are discharged into a bay.

An external classification screen was chosen for both shredding loops to eliminate the risk of heat generation, and subsequent fires, when using an internal screening system. The small shredded pieces (tyre chips) are then loaded into containers using a skid-steer loader. Once containers are full they will be dispatched from the site.

The tyre chips are then sent across state to Tyrecycle's Melbourne premises for further processing and use in roads and playgrounds or sold as Tyre Derived Fuel source.

Used tyres are the only waste type accepted at the premises, and no other solid waste is processed.



The main emissions expected from the premises are noise emissions from vehicle movements and operation of the shredder machinery. In the event of a fire there is a risk of smoke and wastewater emissions. Controls for these emissions are discussed in the Decision Document.

The licences and works approvals issued for the Premises since 10/01/2013 are:

Instrument log		
Instrument	Issued	Description
W5287/2012/1	10/01/2013	Works Approval to construct premises
L8694/2012/1	14/03/2013	New Licence to operate
L8694/2012/2	TBA	Licence renewal

Severance

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

END OF INTRODUCTION

Licence conditions

1 General

1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 For the purposes of this Licence, unless the contrary intention appears:

'Act' means the *Environmental Protection Act 1986*;

'annual period' means the inclusive period from 1 April until 31 March;

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means;

Chief Executive Officer
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au

'controlled waste' has the definition in *Environmental Protection (Controlled Waste) Regulations 2004*;

'Fire Water' means water that, in the event of a fire, has been used to extinguish a fire and all materials and combustion products dissolved or suspended within such water and includes other fire suppressant substances such as foams;

'Inert Waste Type 1' has the meaning defined in Landfill Definitions;



'Landfill Definitions' means the document titled "Landfill Waste Classification and Waste Definitions 1996" published by the Chief Executive Officer of the Department of Environment as amended from time to time;

'Licence' means this Licence numbered L8694/2012/2 and issued under the Act;

'Licensee' means the person or organisation named as Licensee on page 1 of the Licence;

'Premises' means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;

'quarantined storage area or container' means a hardstand storage area or sealed-bottom container that is separate and isolated from authorised waste disposal areas and is capable of containing all non-conforming waste and its constituents, these areas must be clearly marked and their access restricted to authorised personnel;

'Schedule 1' means Schedule 1 of this Licence unless otherwise stated; and

'Schedule 2' means Schedule 2 of this Licence unless otherwise stated.

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.

1.1.4 Any reference to a guideline or code of practice in the Licence means the version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.

1.2 Premises operation

1.2.1 The Licensee shall only accept waste on to the Premises if:

- (a) it is of a type listed in Table 1.2.1;
- (b) the quantity accepted is below any quantity limit listed in Table 1.2.1;
- (c) it meets any specification listed in Table 1.2.1.

Table 1.2.1: Waste acceptance

Waste type	Quantity Limit	Specification
Inert Waste Type 2 (Tyres only)	5,000 tyres at any one time	Tyres for storing
	25,000 tonnes per annual period	Tyres for shredding

Note 1: Additional requirements for the acceptance of controlled waste (including asbestos and tyres) are set out in the Environmental Protection (Controlled Waste) Regulations 2004.

1.2.2 The Licensee shall ensure that where waste does not meet the waste acceptance criteria set out in condition 1.3.1 it is removed from the Premises by the delivery vehicle or, where that is not possible, stored in a quarantined storage area or container and removed to an appropriately authorised facility as soon as practicable.

1.2.3 The Licensee shall ensure that wastes accepted onto the Premises are only subjected to the processes set out in Table 1.2.1 and in accordance with any process limits described in that Table.



Table 1.2.1: Waste processing		
Waste type	Process	Process Limits
Inert Waste Type 2 (Tyres only)	General Storage	No more than 5,000 tyres are to be stored at the Premises at any one time. Tyres shall be: <ul style="list-style-type: none">• stored on level ground; and• stacked on their side walls or if stored on their treads, are baled with a non-combustible securing device.
	Internal Storage	Individual tyre stacks shall: <ul style="list-style-type: none">• be separated at least 3 meters from each other and any wall;• not exceed 30 square meters in area; and• not exceed 3.7 meters in height.• Be a minimum distance of 1 meter from the roof or any structures attached to the roof, including light fixtures and sprinkler heads.
	External Storage	Individual tyre stacks shall: <ul style="list-style-type: none">• be separated at least 6 metres from each other;• not exceed 100 square metres in area; and• not exceed 3 metres in height.
	Shredding and removal off-site	None specified

- 1.2.4 The licensee shall maintain a security fence around the premises such that unauthorised access to stockpiles of tyres stored on the premises is prevented.
- 1.2.5 The Licensee shall implement the following measures for managing the risk of fires:
- ensure that firefighting equipment, stored onsite, is capable of controlling and extinguishing a tyre fire;
 - ensure that tyre stacks do not obscure fire protection equipment (including fire hydrants and fire hoses) or any related signage; and
 - maintain a firebreak of at least 3 meters around the boundary at the premises.
- 1.2.6 The licensee shall ensure that Fire Water is captured and contained on the Premises.
- 1.2.7 The Licensee shall as soon as practicable following the extinguishing of a fire, ensure that all Fire Water is removed from the premises by a carrier licensed under the *Environmental Protection (Controlled Waste) Regulations 2004*.



2 Monitoring

2.1 Monitoring of inputs and outputs

2.1.1 The Licensee shall undertake the monitoring in Table 2.1.1 according to the specifications in that table.

Input/Output	Parameter	Units	Averaging period	Frequency
Waste Inputs	Inert Waste Type 1 (tyres)	Tonnes	N/A	Each load arriving at the Premises
Waste Outputs	Inert Waste Type 1 (whole tyres and tyre chips), or waste type as defined in the Landfill Waste Classification and Waste Definitions 1996 (as amended)			Each load leaving or rejected from the Premises

3 Information

3.1 Records

- 3.1.1 All information and records required by the Licence shall:
- be legible;
 - if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
 - except for records listed in 3.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
 - for those following records, be retained until the expiry of the Licence and any subsequent licence:
 - off-site environmental effects; or
 - matters which affect the condition of the land or waters.
- 3.1.2 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.
- 3.1.3 The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.



3.2 Reporting

3.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 28 calendar days after the end of the annual period. The report shall contain the information listed in Table 3.2.1 in the format or form specified in that table.

Table 3.2.1: Annual Environmental Report		
Condition or table (if relevant)	Parameter	Format or form¹
3.1.2	Compliance	Annual Audit Compliance Report (AACR)
2.1.1	Summary of Inputs and Outputs	None specified

Note 1: Forms are in Schedule 2

3.3 Notification

3.3.1 The Licensee shall ensure that the parameters listed in Table 3.3.1 are notified to the CEO in accordance with the notification requirements of the table.

Table 3.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement¹	Format or form²
1.2.1	Breach of any limit specified in the Licence	Part A: As soon as practicable but no later than 5pm of the next usual working day. Part B: As soon as practicable	N1
-	Fire at the premises	As soon as practicable	None specified

Note 1: Notification requirements in the Licence shall not negate the requirement to comply with s72 of the Act

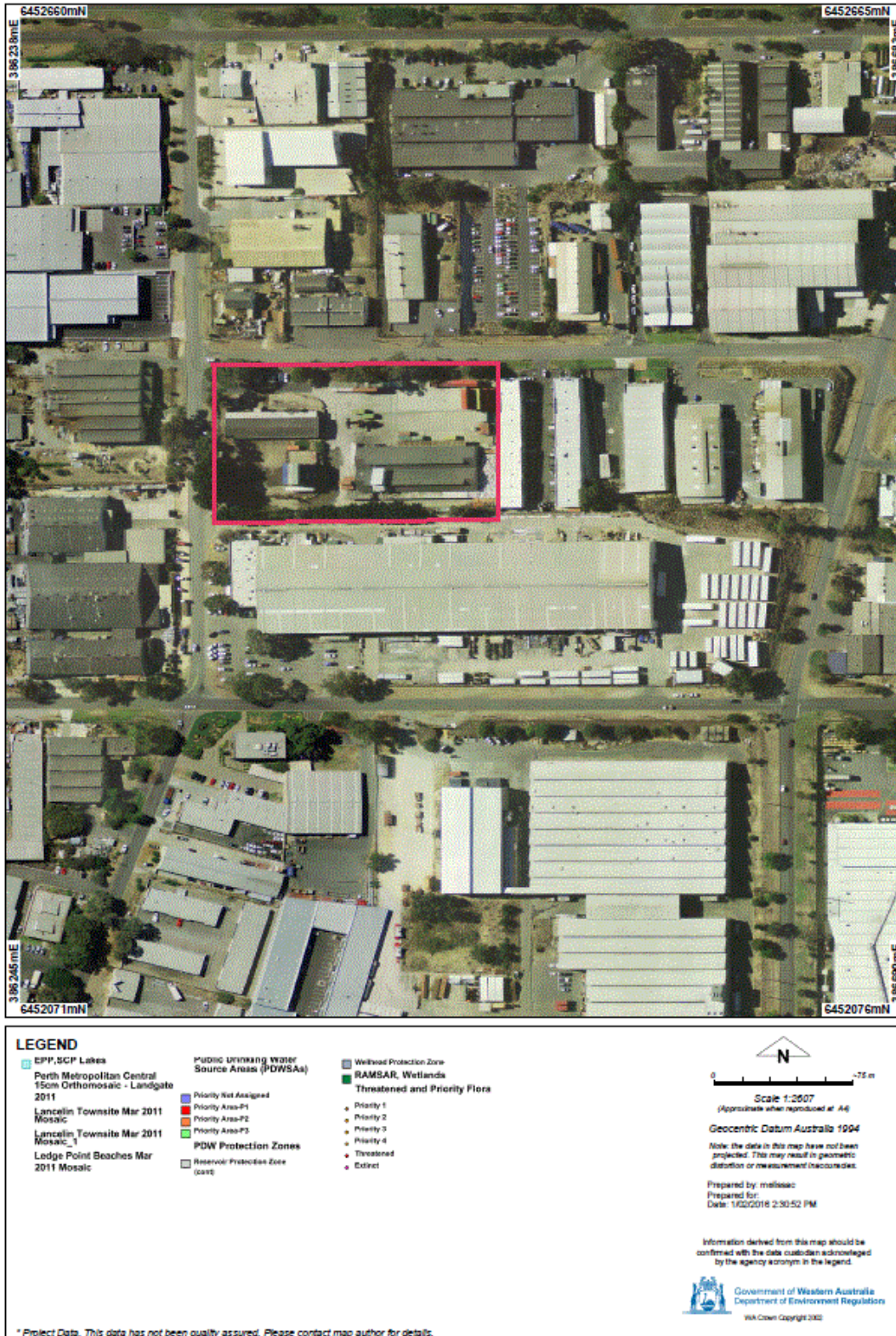
Note 2: Forms are in Schedule 2



Schedule 1: Maps

Premises map

The Premises is shown in the maps below. The pink line depicts the Premises boundary.





Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A

LICENCE DETAILS

Licence Number: L8694/2012/2	Licence File Number:
Company Name: Tyrecycle Pty Ltd	ABN:
Trading as:	
Reporting period: _____ to _____	

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes Please proceed to Section C

No Please proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:



SECTION B

DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:	
b) Date(s) when the non compliance occurred, if applicable:	
c) Was this non compliance reported to DER?:	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____ <input type="checkbox"/> Reported to DER in writing Date _____	<input type="checkbox"/> No
d) Has DER taken, or finalised any action in relation to the non compliance?:	
e) Summary of particulars of the non compliance, and what was the environmental impact:	
f) If relevant, the precise location where the non compliance occurred (attach map or diagram):	
g) Cause of non compliance:	
h) Action taken, or that will be taken to mitigate any adverse effects of the non compliance:	
i) Action taken or that will be taken to prevent recurrence of the non compliance:	

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



SECTION C

SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is		The Annual Audit Compliance Report must be signed and certified:
An individual	<input type="checkbox"/> <input type="checkbox"/>	by the individual licence holder, or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee, or if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the chief executive officer of the licensee; or by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: _____

SIGNATURE: _____

NAME:
(printed) _____

NAME:
(printed) _____

POSITION: _____

POSITION: _____

DATE: ____/____/____

DATE: ____/____/____

SEAL (if signing under seal)



Licence: L8694/2012/2
 Form: N1

Licensee: Tyrecycle Pty Ltd
 Date of breach:

Notification of detection of the breach of a limit.

These pages outline the information that the operator must provide.
 Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

Part A

Licence Number	
Name of operator	
Location of Premises	
Time and date of the detection	

Notification requirements for the breach of a limit	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	



Part B

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission.	
The dates of any previous N1 notifications for the Premises in the preceding 24 months.	

Name	
Post	
Signature on behalf of Tyrecycle Pty Ltd	
Date	



Decision Document

Environmental Protection Act 1986, Part V

Licensee: Tyrecycle Pty Ltd

Licence: L8694/2012/2

Registered office: 30-58 Encore Avenue
Somerton VIC 3062

ACN: 085 545 053

Premises address: Tyrecycle
10 Keegan Street
O'CONNOR WA 6163
Being Lot 94 on Plan 6759, and Lot 95 on Plan 6759

Issue date: Tuesday 1 March 2016

Commencement date: Monday, 14 March 2016

Expiry date: Sunday, 13 March 2022

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER) CEO delegated officer has decided to issue a licence. The assessment has taken into account all relevant considerations.

Decision Document prepared by:

Melissa Chamberlain
Licensing Officer

Decision Document authorised by:

Alan Kietzmann
Delegated Officer



Contents

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1 Purpose of this Document

This decision document explains how DER CEO delegated officer has assessed and determined the application and provides a record of the decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to the delegated officer's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/>	
	New Licence <input checked="" type="checkbox"/>	
	Licence amendment <input type="checkbox"/>	
	Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	57	5,000 tyres at any time
	61A	25,000 tonnes per annual period
Application verified	Date: 28/01/2016	
Application fee paid	Date: 04/02/2016	
Works Approval has been complied with	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Compliance Certificate received	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Commercial-in-confidence claim	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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"/>



3 Executive summary of proposal and assessment

Tyrecycle Pty Ltd is an Australian company involved in the processing of recyclable tyres. Tyrecycle has been operating since 1992 and has operations in every State and Territory within Australia. The premises is located within the City of Fremantle in an area zoned as Industrial. The nearest residents are located approximately 220 meters (m) north, 550 m south, 450 m south-east, 790 m east and 450 m south-west of the premises.

The premises is located within the Tamala Limestone formation, and therefore soils at the premises are expected to be quartz sands overlying limestone. Department of Water's Perth Groundwater Atlas indicates that groundwater is found approximately 37.5 meters below ground level. Water quality beneath the site is expected to have a total dissolved salts (TDS) value of 500-1000 mg/L indicating freshwater quality. The premises is not located in a Public Drinking Water Source Area. No surface water bodies are located within a 1 kilometre (km) radius of the site.

The process at the premises involves shredding and screening used tyres into four inch chips. Any tyres that are found suitable for retreading will be stored separately in a dedicated storage area where they will then be loaded into shipping containers and removed off-site. Tyres for shredding are unloaded directly from the truck onto a conveyor belt which feeds directly into the primary shredding loop. This reduces the need to store these tyres for an extended period. Tyres intended for shredding will only be stored in the event of machinery breakdown. The primary shredding loop consists of a slowly rotating dual shaft shredder followed by an external classification screen, and the product is transferred using belt conveyors. The large oversize pieces are returned to the shredder for further processing while the medium undersized pieces are sent on to the next stage of the process, the secondary loop.

The secondary loop consists of a slowly rotating dual shaft shredder (with smaller blades than the primary shredder) followed by an external classification screen. Product is transferred using belt conveyors. The medium oversize pieces are returned to the shredder for further processing while the small undersized pieces are discharged into a bay.

An external classification screen was chosen for both shredding loops to eliminate the risk of heat generation, and subsequent fires, when using an internal screening system. The small shredded pieces (tyre chips) are then loaded into containers using a skid-steer loader. Once containers are full they will be dispatched from the site.

The tyre chips are then sent interstate to Tyrecycle's Melbourne premises for further processing and use in roads and playgrounds or sold as Tyre Derived Fuel source.

Used tyres are the only waste type accepted at the premises, and no other solid waste is processed.

The main emissions expected from the premises are noise emissions from vehicle movements and operation of the shredder machinery. In the event of a fire there is a risk of smoke and wastewater emissions. Controls for these emissions are discussed below.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Premises Operation	L1.2.1-1.2.5	<p>Condition 1.2.1 limits the waste types and quantities that can be accepted at the premises to those that have been assessed under the licence application as suitable given the infrastructure and control measures at the premises.</p> <p>Conditions 1.2.2 specifies that waste must be visually inspected to ensure compliance with condition 1.2.1, and where waste is found to be non-conforming, the waste is segregated and removed offsite.</p> <p>Condition 1.2.3 limits the waste processing that can occur to those assessed under the licence application as suitable given the infrastructure and control measures at the premises, and relevant to the licence categories applied for.</p> <p>While there are no air or water emissions expected during normal operations, in the event of a fire significant amounts of wastewater (fire water) and smoke would be generated.</p> <p><u>Emission Description</u> <i>Emission:</i> Smoke emissions in the event of a fire. <i>Impact:</i> Potential impact on surrounding flora and fauna and nearby sensitive receptors from smoke inhalation. Potential irritation to eyes from smoke and other pollutants released when the tyres are burnt. <i>Controls:</i> The licence renewal application does not contain any information on fire controls. The licensee has previously indicated that mist sprays are installed to prevent overheating. Commercial sweepers and vacuums are used to remove excess build-up of rubber and dust particles. Smoke detectors are installed, and fire hydrants installed</p>	<p>Application supporting documentation</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i></p> <p><i>Environmental Protection (Controlled Waste) Regulations 2004</i></p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>every 50 meters along the northern and southern boundaries. There are two separate entrances to the premises to ensure sufficient access for fire fighting vehicles.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Condition 1.2.3 and Table 1.2.1, Condition 1.2.5 specify how tyres must be stored to reduce both the risk of fire beginning, and to assist in efficiently extinguishing a fire.</p> <p>Condition 1.2.4 requires a security fence to be maintained around the premises to ensure no unauthorised access to prevent unauthorised fires or vandalism of firefighting controls.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Emission Description</u> <i>Emission:</i> Fire wastewater generated in the event of a fire. <i>Impact:</i> Contamination of surrounding land. Potential impacts on surrounding flora and fauna from the take-up or drinking of water contaminated with heavy metals and other pollutants. Potential impacts on surrounding groundwater users from groundwater contamination as a result of firewater infiltration. <i>Controls:</i> The licence application does not specify any wastewater controls. The licensee has previously provided a report indicating that at least 162,000 litres of wastewater can be contained on site in the event of a fire.</p>	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Conditions 1.2.5 and 1.2.6 have been added to the licence to ensure firewater is contained on the premises and removed by a licensed contractor in the event of a fire.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p>	
Fugitive emissions	N/A	Activities at the premises are not expected to generate any significant fugitive emissions. Smoke emissions in the event of a fire are risk assessed above in Premises Operations.	N/A
Odour	N/A	Activities at the premises are not expected to generate any significant odour emissions.	N/A
Noise	N/A	<p><u>Emission Description</u> <i>Emission:</i> There is a potential for noise emissions to be generated from the vehicle movement at the premises, and operation of the shredder and screener. <i>Impact:</i> Unacceptable noise emission affecting comfort and amenity of residents at the nearest sensitive receptor. <i>Controls:</i> The licence application did not include any proposed noise control measures. The shredder is a slow rotation model and is within an enclosed shed with both the feed conveyor and shred discharge conveyor going through small holes in the building wall.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor</p>	N/A



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><i>Likelihood: Unlikely</i> <i>Risk Rating: Moderate</i></p> <p><u>Regulatory Controls:</u> Based on the assessment of risk, the provisions of the <i>Environmental Protection (Noise) Regulations 1997</i> are expected to be sufficient in regulating any potential noise emissions.</p> <p><u>Residual Risk</u> <i>Consequence: Minor</i> <i>Likelihood: Unlikely</i> <i>Risk Rating: Moderate</i></p>	
Monitoring	L2.1.1	Condition 2.1.1 and Table 2.1.1 requires monitoring of waste inputs and outputs to monitor compliance with condition 1.2.1 and Table 1.2.1.	N/A
Information	L3.1.1 – 3.3.1	<p>Condition 3.1.1 sets out the requirements for any records that are required under this licence, such as ensuring they are legible and retained for 6 years, which assists DER in regulating the conditions of this licence.</p> <p>Condition 3.1.2 requires the occupier to undertake an audit of their operations against the conditions of the licence and to report on this compliance in an Annual Audit Compliance Report (AACR). This condition assists DER in regulating the occupier's compliance with licence conditions and allows an opportunity for DER to review the occupier's environmental performance.</p> <p>Condition 3.1.3 requires a complaints management system to be implemented where the occupier can internally address any issues that arise from premises operations. DER will review these complaints as reported in the Annual Environmental Report</p>	N/A



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>(AER) and can consider the requirement for the reassessment of any regulatory controls to address the complaints.</p> <p>Condition 3.2.1 requires the licensee to submit an AER. The AER is required to include the AACR and a summary of the complaints required under condition 3.1.3. The AER is also required to provide the results for the monitoring of inputs/outputs, and a summary of any malfunction of pollution control equipment or any environmental incidents. DER reviews all of the data provided in the AER to assess compliance with the licence conditions and to monitor the environmental impacts from the premises.</p> <p>Condition 3.3.1 requires the licensee to notify the CEO if there is a breach of any licence limit (i.e. processing limits), and in the event of any fire occurring at the premises. The notifications required under this condition give DER appropriate notice of any potential environmental impacts at the premises so that DER can determine if any further action is required to address the incident.</p>	
Licence Duration	N/A	Consideration has been given to the duration of the licence. During assessment the premises has been given an overall risk rating of low. The term of the current lease held by Tyrecycle expires on the 31 October 2022, and therefore the licence is issued until 2022.	Department of Environment Regulation Guidance Statement, Licence Duration, November 2014 (revised May 2015).



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
15/02/2016	Application advertised in West Australian	No comments received	N/A
17/02/2016	Proponent sent a copy of draft instrument	Comments were requested by 29/2/2016. No comments were received.	N/A



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High