

| 11.1 – Watkins Road Waste Transfer Station Closure and Interim Measures | |
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| Responsible Officer: | Manager Waste and Fleet |
| Senior Officer: | Director Infrastructure Services |
| Disclosure of Officer's Interest: | No Officer involved in the preparation of this report has an interest to declare in accordance with the provisions of the <i>Local Government Act 1995</i> . |

Authority / Discretion

| | |
|-----------|---|
| Executive | The substantial direction setting and oversight role of the Council such as adopting plans and reports, accepting tenders, directing operations and setting and amending budgets. |
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Report Purpose

The purpose of this report is to provide Council with an update on the recent closure of the Watkins Road Waste and Recycling Transfer Station and propose short-term actions for management of green waste and household bulk waste.

Relevant Previous Decisions of Council

Nil.

Background

The Watkins Road Waste Transfer Station (WTS) is located at 40 (Lot 512) Watkins Road, Mundijong.

Until the year 2000, the site was used as a Class I and Class II landfill facility for inert and putrescible waste. The Shire's records indicate that the two cells of the landfill, the area where green waste has been stored and processed since the site was opened as a waste transfer station in 2020, was the last part of the landfill to be filled and capped with 300mm of clean fill soil.

In 2008, following the introduction of the Contaminated Sites legislation, the Department of Water and Environmental Regulation (DWER), formerly Department of Environment and Conservation (DEC) wrote to the Shire informing of the memorial that was being placed on the title of the land, stating that the site was being classified as a Contaminated Site – Possibly Contaminated. The DEC had advised earlier that the soil and groundwater sampling and analysis by the Shire would be required.

Contact Us

Enquiries

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Open Monday to Friday 8.30am-5pm (closed public holidays)



www.sjshire.wa.gov.au



The Shire received DWER licence L9073 in June 2020, which includes approvals for the following operations at the WTS:

| Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i>) | Assessed production / design capacity |
|---|--|
| Category 13: Crushing of building material: premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned | 5,000 tonnes per annual period |
| Category 57: Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored | Not greater than 250 tyres at any one time |
| Category 61A: Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land | 1,400 tonnes per annual period |
| Category 62: Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use. | 16,000 tonnes per annual period |

The facility has been operational since December 2020 and open to Shire residents for drop-off of bulky waste items and green waste.

In approving the use of the site, Council agreed to stop providing verge collection services and have some restricted on-demand collections. Therefore, most residents use the WTS for disposal of bulky household items such as furniture, whitegoods, mattresses, and green waste. Green waste was being received and processed to produce mulch in the area above the last two landfill cells. The mulch was being provided to residents free of charge, on demand.

During August 2023, Officers identified the need for drainage improvements to prevent storm water runoff into the adjoining DBCA reserve. In preparation for the drainage works, in September 2023. Prior to starting minor drainage works, a consultant was engaged to investigate the area of works, limited to the green waste processing site, to confirm if there was any asbestos in the former landfill cells. This investigation focused on sub surface layers to determine integrity of the cap and risk of asbestos exposure. The consultant, Environmental Risk Consultants (ERC), collected twelve samples from subsurface test pits across the green waste processing area, confirming two of the twelve test sites contained asbestos. The depth where the asbestos was located in the two test pits was at half a metre (0.5m) from the surface.

The Consultant's report indicated that this may have been due to depletion of the cap in some areas.

Following this advice, Shire Officers cordoned off the high risk area where the cap had been severely depleted to prevent access to this part of the site. During this inspection and testing, presence of asbestos on surface was not identified.

The initial consultant's report was considered by the Executive Management Group (EMG) on Tuesday, 3 October who determined the need for further investigation and decided to have the Shire's Environmental Health Team and Workplace Health and Safety Officer inspect the site. This occurred on 3 October, when the WTS was closed to the public. The Officers found suspected asbestos fragments in a wider section of the facility including the area in the vicinity of the Reuse Shop and provided recommendations for the EMG to consider.



Talis Consultants were then requested to visit site on 5 October to confirm the presence of asbestos and prepare a fee proposal to undertake a more comprehensive investigation across the entire facility to determine the extent of contamination. During that site inspection, fragments of asbestos were found on surface.

EMG met to consider the findings and recommendations from the staff and Talis visits on Thursday, 5 October and decided to close the facility in the interest of public health that day.

Talis Consultants commenced an inspection on 6 October. This inspection identified that potential asbestos fragments were spread widely across the entire site, **refer attachment 1**. These fragments along with soil samples have been collected and sent for testing to a laboratory with the results and confirmation due by Wednesday, 18 October. However, the consultants were confident that the fragments were asbestos and raised concern in relation to the extent of the contamination.

Talis' initial response stated, "There are also a range of areas onsite that have previously been covered and are likely to contain ACM and other potential contaminants (not the subject of this investigation). Given this, we would suggest that activity onsite has the potential to create further asbestos risk. The fragments themselves do not necessarily reflect a significant concern, but where vehicular movements and equipment is used onsite, this has the potential to mobilise asbestos fibres. To this end, we would suggest that all public access to the site is immediately prohibited and any workers onsite have their activities restricted and are provided with appropriate PPE. Ideally, the site will be closed to all activity, pending further discussion/advice."

It is evident based on this information and further discussions with DWER, it is unlikely that the site can be opened to the public for an extended period. The site will need to be closed until an asbestos management plan and remediation methodology is developed and approved by the Shire and State Government authorities and the site is remediated. As per the contaminated sites information, it is important for the Shire to now also complete the soil and underground water testing that was previously required by DWER. The length of closure will be better known once further information becomes available regarding the scale of remediation and State Government approval process.

Officers are operating in accordance with the Shire's Business Continuity Plan, and a Crisis Management Team including members of the EMG, and relevant senior officers have been assembled to manage a range of aspects including risk management and communications with stakeholders. It is important to note that all external and internal communications in relation to this matter will be managed as per the Business Continuity Plan.

Given there is no timeframe for the WTS to re-open at this stage. Officers consider it important to provide residents with bulk and green waste disposal options in the intervening period. This report focuses on the interim measures proposed to provide residents with a service to manage green waste and bulk waste until January 2024. A follow-up report on the measures to manage the site for the coming calendar year will be presented to Council before the end of 2023.

Community / Stakeholder Consultation

Community

In accordance with the Shire's Business Continuity Plan, a Crisis Communications Plan was developed and the following communication activities have been undertaken:

- Media Release
- Variable Message Board at WTS



- Notice of closure on WTS gates
- FAQs for website/customer service
- Social media updates
- eNewsletter updates

Councillors

Elected Members have received an email update and a briefing was provided to Elected Members on Monday, 9 October 2023.

Statutory Environment

Environmental Protection Act 1986

This is the peak legislative body that sets direction on environmental protection matters including licensing of prescribed premises and management of waste.

Environmental Protection Regulations 1987

Premises with potential to cause pollution or environmental harm to the environment, water resources, public health and/ or amenity are known as 'prescribed premises'. Prescribed premises categories are outlined in Schedule 1 of the regulations.

Contaminated Sites Act 2003

Provides a framework for the identification, recording, management and remediation of land to be classed as contaminated sites.

Contaminated Sites Regulations 2006

These regulations stipulate the process to be followed to register and manage contaminated sites.

Waste Avoidance and Resource Recovery Act 2007

The Act provides waste avoidance and resource recovery, management of local government waste including charging of fees and application of levies on waste.

Comment

Update on Asbestos Findings

During their visual inspection on Tuesday, 9 October 2023 Talis Consultants found potential asbestos fragments were spread widely across the entire site. Figure 1 below shows the walking track of the officer conducting the sampling. A total of 16 fragments and 31 soil samples have been collected from various locations across the facility and sent to an accredited laboratory for testing.



Figure 1: Site Plan showing track of asbestos walkover

Given the extent of contamination, Talis has recommended closing the site and preventing access to the site until further notice. Talis is likely to recommend in the Summary Findings report following the laboratory results, that a detailed site investigation including air monitoring be conducted to further investigate the matter to better understand the extent of surface, sub surface soil contamination and associated risks.

The following key stakeholders have been notified of the findings:

- DWER - in relation to the contamination and are expecting further information before providing some direction on the matter.
- Worksafe WA - who are satisfied with the actions taken so far in relation to workplace, health and safety and anticipate further updates as available.
- LGIS the Shire's insurer.
- WTS Contractors - informed not to visit the site until further notice.
- C-Wise – who received the greenwaste from the Shire have also been advised of the matter and to visually inspect the loads received from the Shire.

Officers are currently seeking legal advice on this matter as well.



Planned Time Phases

Given the current uncertainty in relation to the extent of the remediation required for the site and the time required to complete the remediation works, the time periods have been broken up into three phases as per Table 1 below:

| Phase | Date Range | Council Report Date |
|-------------|--------------------------------|---------------------|
| Short-term | November 2023 to January 2024 | October 2023 |
| Medium-term | February 2024 to December 2024 | Before end 2023 |
| Long-term | January 2024 onwards | TBA |

This report therefore focuses on the short-term strategies to provide bulk green waste and hard waste services for the Shire's residents between November 2023 and January 2024. Plans for management of these waste types for the medium-term will be covered in a separate report to Council before the end of 2023.

Greenwaste Provisions

There is a need to urgently remove green waste from residential properties.

Given the short timeframe to implement, there are two alternatives available to the Shire for management of green waste:

1. Shire-wide green waste verge collection in November 2023
2. City of Armadale green waste tip passes

Shire-wide green waste verge collection in November 2023

Prior to the opening the WTS to the public, the Shire managed the collection of green waste using contractors through a verge collection contract. This option proposes to re-establish the previous green waste collection practice by engaging a contractor. On planned dates based on geographical areas, residents place greenwaste materials on their verge. In the week following the scheduled place out dates, the Shire's contractor will collect and transport the greenwaste to the designated facility for processing.

Advantages

- As many properties present large volumes of green waste at the WTS, placing green waste on the verge allows unrestricted amounts, which can be taken away by the contractor.
- Removal of larger volumes of green waste reduces the risk of fires.
- Not all residents have access to trailers, therefore this option is practical for most residents.
- It is likely to attract less negative feedback from the community in relation to the option chosen.
- Once set up, the customer service requirements are minimal (generally). However, as this is a change, there are anticipated to be more calls than normal for a scheduled verge collection, which will be a change to the status quo.
- Larger volumes of green waste collected for processing increase material recovery rates and reduce the need for burning the materials (public health hazard).



Disadvantages

- The green waste can only be removed within a 5-week period in Nov-Dec 2023.
- New contracts are required to be set up within a short timeframe putting pressure on limited staffing resources.
- Longer time-frame to set up the start of green waste verge collection service.
- The cost of service is expected to be higher.

Cost of Service

The Shire has received an estimated charge of \$185 per tonne for collection and transport of green waste. It is anticipated that processing of green waste could be as much as \$80 per tonne, in addition to the collection and transport cost. Therefore, if 400 tonnes are collected during the collection cycle, the green waste service would cost the Shire approximately \$106,000.

City of Armadale green waste tip passes

The City of Armadale have informed the Shire that tailor made tip passes can be designed for use by the Shire's residents. The letters containing the green waste tip passes can be made available for collection by residents at the Administration Building Reception and Library. Each tip pass will have a unique identifying number, which will be used to invoice the Shire once presented to the City of Armadale at the end of each month.

Letters with tip passes will be issued to residents of the Shire upon presentation of identification and/or proof of residence within the Shire. Each tip pass allows a maximum of 1.3m³ of green waste to be taken to the facility. A maximum volume of 2.6m³ (two passes) is allowed for each visit.

Given the short timeframe validity (until January 2024) for these passes, it is anticipated that tip passes will need to be limited to two per household.

Advantages

- There is less administration required to set-up and make the tip passes available to residents within two weeks.
- Once introduced, residents can commence dropping off greenwaste materials to the City of Armadale facility at 145 Hopkins Road, Hilbert on the same day.
- The passes can be used until the end of January 2024.
- The cost of the service is anticipated to be lower.

Disadvantages

- Even two passes per household might not be sufficient for households with large volumes of greenwaste.
- It presents challenges for residents to access the service if they do not have a trailer or utility vehicle available.
- More negative feedback from the community may be received with this service provision. Especially because tip pass numbers will need to be limited.
- Customer Service for provision of tip passes and management of enquiries will be ongoing.



Cost of Service

Assuming that 400 tonnes of green waste is delivered to the City of Armadale landfill site at 0.15 tonnes/m³, this would equate to 2,667m³ of green waste or use of 2,051 tip passes. If all of the 400 tonnes of green waste was delivered to the City of Armadale using a single tip pass, the total cost to the Shire would equate to \$72,820. Additionally, design and printing of the passes will cost the Shire \$1,200.

Although, there are advantages to issuing tip passes for green waste including less administrative work involved and lower costs, Officers recommend that a scheduled green waste verge collection service be provided. The main reasons being the larger volumes of green waste for households that use the service at the WTS, which would be complicated to manage with the volume restrictions on tip passes.

Bulk Waste Service Provision

Unlike green waste there is not as much of an urgency to provide a bulk waste services. However, given that the WTS will be closed, some provision needs to be made available for residents.

Given the short timeframe to implement the service and also because the service would only be applicable until January 2024, the only viable option available for the Shire for bulk waste is the use of City of Armadale tip passes.

Reasons to use City of Armadale bulk waste tip passes:

- The set up of a bulk waste verge collection requires the set up a range of different contracts for different material types such as waste, mattresses, metals, whitegoods. There is insufficient time for this.
- The collection and transport costs vary as the materials need to be separated in a verge collection scenario.
- Contractors are unlikely to be available over the Christmas and New Year period.
- A scheduled bulk waste verge collection service would cost the Shire more due to the large distances to be covered and because of the cost of disposal, which includes the waste levy.
- The City of Armadale passes could be limited to two passes for each household.
- The set up of bulk waste tip passes would be a quick process and allows residents flexibility on when they could take their bulky materials to the Armadale facility.

Cost of Service

As per the City of Armadale's adopted Fees and Charges, the Shire will be charged \$54.50 for use of one tip pass with a maximum limit of 1.3m³ per load. If two passes are used in the same trip for a maximum of 2.6m³, the Shire will be charged \$87.50.

Based on the bulk waste volumes collected in 2022/23 at the WTS, it is assumed that during the November 2023 to January 2024 timeframe, approximately 1,000 tonnes of waste may be collected. Assuming a conversion factor of 0.3 tonnes/m³, this would equate to 3,333m³ or 2,564 tip passes. If all tip passes were used singularly, it would cost the Shire \$139,744. Additionally, design and printing of the passes would cost the Shire \$1,200.

Officers recommend seeking an arrangement to make available for residents at the Shire's Administration Building and Library, a letter with two bulk waste tip passes valid until January 2024.



Options and Implications

Option 1

That Council:

1. Notes that Officers have activated the Shire's Business Continuity Plan and is managing the incident through the Crisis Management Team.
2. Notes the interim findings of the asbestos investigation at the Watkins Road Waste and Recycling Transfer Station as per attachment 1.
3. Authorises the Chief Executive Officer to engage suitable contractors to provide a scheduled greenwaste verge collection service starting in November 2023, noting that the standard advertising periods to obtain quotes will be limited to one week.
4. Authorises the Chief Executive Officer to purchase sufficient tip passes from the City of Armadale to provide for two bulk waste tip passes per residential property to be distributed as best determined by the Officers for the period ending January 2024.
5. Costs incurred in relation to the above points to be charged against the Waste Transfer Station Cost Centre.
6. Requests the Chief Executive Officer present a follow-up report before the end 2023 to Council detailing:
 - a) The asbestos investigations findings;
 - b) Options for management of remediation and management of the Watkins Road Waste and Recycling Transfer Station;
 - c) Options for management of green waste and household bulk waste for the 2024 calendar year; and
 - d) A detailed budget variation.

The recommendations in Option 1 allow the Shire to handle the matter systematically, strategically and with timely updates and prioritises a verge collection for greenwaste over tip passes.

Option 2

That Council:

1. Notes that Officers have activated the Shire's Business Continuity Plan and is managing the incident through the Crisis Management Team.
2. Notes the interim findings of the asbestos investigation at the Watkins Road Waste and Recycling Transfer Station as per **attachment 1**.
3. Authorises the Chief Executive Officer to purchase sufficient tip passes from the City of Armadale to provide for two green waste tip passes per residential property to be distributed as best determined by the Officers for the period ending January 2024.
4. Authorises the Chief Executive Officer to purchase sufficient tip passes from the City of Armadale to provide for two bulk waste tip passes per residential property to be distributed as best determined by the Officers for the period ending January 2024.
5. Costs associated to be incurred in relation to the above points to be incurred against the Waste Transfer Station Cost Centre.
6. Requests the Chief Executive Officer present a follow-up report before the end 2023 to Council detailing:
 - a. The asbestos findings;
 - b. Options for management of remediation and management of the Watkins Road Waste and Recycling Transfer Station;



- c. Options for management of green waste and household bulk waste for the 2024 calendar year; and
- d. A detailed budget variation.

The recommendations in Option 2 allow the Shire to handle the matter systematically, strategically and with timely updates and prioritises City of Armadale tip passes for both greenwaste and bulky waste.

Option 3

That Council:

1. Notes that Officers have activated the Shire's Business Continuity Plan and is managing the incident through the Crisis Management Team.
2. Notes the interim findings of the asbestos investigation at the Watkins Road Waste and Recycling Transfer Station as per **attachment 1**.
3. Authorises the Chief Executive Officer to engage suitable contractors to provide a scheduled green waste verge collection service starting in November 2023, noting that the standard advertising periods to obtain quotes will be limited to one week.
4. RESOLVES that costs associated to be incurred in relation to the above points to be incurred against the Waste Transfer Station Cost Centre.
5. Requests the Chief Executive Officer present a follow-up report before the end 2023 to Council detailing:
 - a. The asbestos findings;
 - b. Options for management of remediation and management of the Watkins Road Waste and Recycling Transfer Station;
 - c. Options for management of green waste and household bulk waste for the 2024 calendar year; and
 - d. A detailed budget variation.

The recommendations in Option 3 allow the Shire to handle the matter by making arrangements for single round of collecting green waste only.

Option 1 is recommended.

Conclusion

In response to the identification of asbestos at the WTS, the Business Continuity Plan was activated. The Crisis Management Team has determined three phases for management of the crisis. This report details options for the short-term for Councils consideration for provision of temporary bulk and green waste options for residents.

Attachments (available under separate cover)

11.1 - attachment 1 – Email from Talis Consultants following Preliminary Site Investigation (IN23/22280)

Alignment with our Strategic Community Plan

| | |
|-----------------------|---|
| Strategy 2.2.3 | Continue to minimise the volume and impact of waste generated with the district |
| Strategy 4.1.2 | Maximise the Shire’s brand and reputation in the community |



Financial Implications

As the WTS will be closed in the short-term, the funds allocated for the operation of facility could be deployed towards the costs of the scheduled green waste verge collection service and City of Armadale bulk waste tip passes.

Option 1 Costs –

It is anticipated that Option 1 recommendations including the scheduled green waste collection and City of Armadale tip passes will cost the Shire ~\$247,000. This is based on the volumes delivered to the WTS in 2022/23.

In the unlikely worst case scenario that all households issued with tip passes take up both bulk passes singularly, this option would cost the Shire \$1.44 million for bulk waste tip passes and \$106,000 for the green waste verge collection. This scenario is very unlikely as the reported actual rate of tip pass usage in some of the surrounding Local Governments is around 35%.

Option 2 Costs –

It is anticipated that Option 2 recommendations including City of Armadale tip passes for both green waste and bulk waste will cost the Shire ~214,000. This is based on the volumes presented at the WTS in 2022/23.

In the unlikely, worst case scenario that all households take up both bulk passes singularly, this option would cost the Shire \$1.44 million for the bulk waste tip passes along with \$937,200 for 100% take up of the green waste tip passes.

Option 3 Costs – It is anticipated with only one green waste verge collection service, the costs for 400 tonnes collected would equate to \$106,000. If the number of green waste tonnes collected during the verge collection doubled, so would the costs.

Officers will present a report before the end of 2023 for Council's consideration detailing the associated financial impacts of this matter, including but not limited to employee costs, materials and contracts, collections and disposal costs, consultants, legal and technical advice.

Risk Implications

Risk has been assessed on the Officer Options and Implications:

| Officer Option | Risk Description | Controls | Principal Consequence Category | Risk Assessment | | | Risk Mitigation Strategies (to further lower the risk rating if required) |
|----------------|---|--|--------------------------------|-----------------|-------------|-------------|---|
| | | | | Likelihood | Consequence | Risk Rating | |
| 1 | Availability of contractors to implement the verge collection service | Preliminary discussions held with contractors. | Organisational Performance | Unlikely | Moderate | MODERATE | |



| | | | | | | | |
|---|---|--|----------------------------|----------|----------|-------------|--|
| 1 | Cost blow outs due to excessive take-up of bulk waste tip passes. | Preliminary discussions with City of Armadale assuring that the take up rate through the year is 27% | Financial | Rare | Major | HIGH | |
| 2 | Timeliness to implement tip pass system. | Preliminary discussions held with City of Armadale. | Organisational Performance | Unlikely | Moderate | MODERATE | |
| 2 | Cost blow outs due to excessive take-up of bulk waste tip passes. | Preliminary discussions with City of Armadale assuring that the take up rate through the year is 27% | Financial | Rare | Major | HIGH | |
| 3 | Residents pushback due to lack of bulk waste options. | Time period is until January 2024 | Reputation | Likely | Moderate | SIGNIFICANT | |

Voting Requirements: Absolute Majority

Officer Recommendation

That Council:

1. Notes that Officers have activated the Shire's Business Continuity Plan and is managing the incident through the Crisis Management Team.
2. Notes the interim findings of the asbestos investigation at the Watkins Road Waste and Recycling Transfer Station as per attachment 1.
3. Authorises the Chief Executive Officer to engage suitable contractors to provide a scheduled greenwaste verge collection service starting in November 2023, with an advertising period to obtain quotes limited to one week.
4. Authorises the Chief Executive Officer to purchase sufficient tip passes from the City of Armadale to provide for two bulk waste tip passes per residential property to be distributed as best determined by the Officers for the period ending January 2024.
5. **RESOLVES** that costs associated to be incurred in relation to the above points to be incurred against the Waste Transfer Station Cost Centre.



Continued

**Ordinary Council Meeting – 16 October 2023 – 11.1 –
Urgent Business – Watkins Road Waste Transfer
Station Closure and Interim Measures**

- 6. Requests the Chief Executive Officer present a follow-up report before the end 2023 to Council detailing:**
 - a. The asbestos investigation findings;**
 - b. Options for management of remediation and management of the Watkins Road Waste and Recycling Transfer Station;**
 - c. Options for management of green waste and household bulk waste for the 2024 calendar year; and**
 - d. A detailed budget variation.**