

December 2, 2015

Enquiries: E80.0181
Reference: OUT15/33716D2

Scheduled Premises Regulations Review
c/o- Policy and Regulation Unit, EPA Victoria
GPO Box 4395
Melbourne VIC 3001

Dear Sir/Madam,

Re: Proposed scheduled premises – waste transfer stations

I write to detail the views of Wodonga Council on the proposal to include waste transfer stations into the regime of Scheduled Premises.

Council does not support the view that waste transfer stations should be included in the legislation relevant to scheduled premises. We are more interested in reducing red tape and not providing an un-necessary layer of burden on that industry, particularly as often these premises are owned and/or operated by council.

Numerous waste transfer stations are fairly new and during that have construction, have taken into account the environmental impact of their operations. Concerns over spillages and leaks is not warranted as these premises have been designed with that particular view in mind. The temporary storage of products prior to being on-forwarded to a recycler or re-processor further reduces any likelihood of concerns.

In regard to the specific questions, I can advise:

1. Limit to higher risk activities;
2. No comment other than noting that the reduction over time is supported;
3. No comment;
4. We still support licensing and works approvals for high risk activities;
5. No comment;
6. Targeting high emitters has merit;
7. No comment;
8. We support the works approval process over licensing;
9. We support the tiered approach;
10. No comment;
11. Focus on high, regular emitters. Continue to increase license conditions as necessary;
12. A waste transfer station does not fit the category of the illustrative example of electroplating and any environmental pollution occurring at a waste transfer station, (albeit very unlikely) can be suitably dealt with by the existing environmental legislation.



Please feel free to contact the writer who is the manager responsible for waste management, for any further comments or clarity.

Yours faithfully

