



Application for Licence

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

Licence Number	L9436/2024/1
Applicant	Holcim (Australia) Pty Ltd
ACN	099 732 297
File number	DWER2024/000155
Premises	Comet Vale Sand Quarry Mining tenements M29/95 and L39/69 As defined by the premises maps attached to Schedule 1 of the licence
Date of report	12 June 2024
Decision	Licence granted

**Manager, Resource Industries
REGULATORY SERVICES**

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 operation of the premises. As a result of this assessment, licence L9436/2024/1 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

On 16 April 2024, Holcim (Australia) Pty Ltd (Holcim) submitted an application under section 57 of the *Environmental Protection Act 1986* (EP Act) for a licence to operate mobile sand screening infrastructure at their Comet Vale Quarry premises, located approximately 25km south of the town of Menzies just off the Goldfields Highway. Works Approval W6826/2023/1 for the construction and time limited operations of the mobile sand screening plant was granted on the 7 September 2023.

The applicant previously operated a sand screening operation at the site; however, the premises has previously not been registered or licenced as the site produced less than the *Environmental Protection Regulation 1987* (EP Regulations) prescribed premises category 70 production capacity of over 5,000 tonnes per annum (tpa).

The construction works approved under W6826/2023/1 increased the screened sand production from under 5,000 tpa to 50,000 tpa. Sand is extracted using a front-end loader, and temporarily stockpiled before screening in a mobile screening plant. The product is then stockpiled before transportation offsite by truck. Holcim have estimated the life of mine to be approximately 20 years. It is assumed that the screening plant will be operated within the same time period.

Construction works have been completed and an Environmental Compliance Report was submitted on 1 December 2023 prior to time limited operation of the infrastructure being granted on 22 December 2023.

The premises relates to the category and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L9436/2024/1. 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 licence L9436/2024/1.

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.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises 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
Operation			
Dust	Screening, unloading, loading and storage of material and vehicle movements	Dust generated via activity being transported offsite by wind to the receptor.	<ul style="list-style-type: none"> Screening to not occur in adverse weather conditions; Operation of the screen will be operated to reduce unnecessary dust generation (material loaded same direction as the belt and minimal material drop distance); and Skirt systems installed at transfer points.
Sediment laden water runoff	Excess water used for dust control during all onsite activity including stockpile dust management, and large rainfalls creating stormwater	Sediment transported offsite via excess water runoff.	<p>No controls proposed.</p> <p>It expected that all stormwater will drain due to sandy soils at the site.</p>
Hydrocarbons	Hydrocarbon spills / leaks from plant and/or spills while refueling	Direct discharge to land	<ul style="list-style-type: none"> All wastes are segregated and removed from site for recycling, reuse or disposal by appropriate licensed subcontractors; Operators will remain with their vehicle at all times during refueling to permit immediate response in the event of any spill or leakage; Refueling to be completed by a self banded fuel trailer; Maintain all refueling equipment in good working order in accordance with the site maintenance schedule; No fuel stored or kept onsite overnight; Spill response equipment is available and readily accessible, and employees have spill response training; Servicing and maintenance of equipment is conducted offsite; and Regular maintenance of mobile equipment and vehicles.

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Town of Menzies	Approximately 25km north of the Premises. Screened out due to distance
Occupiers of prescribed premises L7817/2000/6	A prescribed premises (held by Reed Resources Ltd) is located approximately 2.8kms south of this proposed prescribed premises. Screened out due to distance.
Environmental receptors	Distance from prescribed activity
Threatened and Priority Fauna	Threatened bird species are located approximately between 160m and 1,500m south and southwest of the proposed prescribed premises. Fauna was sighted in between 1975 and 2011 however has an accuracy of sighting ranges from 1,000m to 10,000m in Geocortex. Due to the nature (opportunistic siting), date of the siting (12 years ago) and the emission that the premises is likely to produce (noise and dust) the mobility of the fauna would cause there to be no or negligible risk to the receptor. Screened out due to distance.
Threatened and Priority Flora	Priority flora has been identified within and nearby the proposed prescribed premises: <ul style="list-style-type: none"> Priority 2 flora (OBJECTID2461, Database ID105601) can be found within the portion of the "Rehabilitation Area" presented in Attachment 2 in the Holcim application form. The siting of the flora was recorded in 2007. Priority 1 flora (OBJECTID14671, Database ID85947) is identified approximately 70m south of the proposed prescribed premises. The siting was recorded in 1996. Aerial imagery available through Geocortex was reviewed and the vegetation in the immediate area appears undisturbed.
Native Vegetation	Native vegetation is present within and immediately adjacent.

Surface water bodies	Lake Goongarrie is located approximately 1km southeast of the proposed prescribed premises. No surface water bodies or drains are found within 1km of the premises. Screened out due to distance.
Threatened Ecological Communities (TECs)	No TECs were identified within 2kms from the proposed prescribed premises. Screened out due to distance.
Adelong pastoral station	The Adelong pastoral boundary is located approximately 4.1km west of the proposed prescribed premises. Screened out due to distance.
Jeedamya pastoral station (discounted)	The Jeedamya pastoral boundary is located approximately 4.5km northeast of the proposed prescribed premises. Screened out due to distance.
Indigenous receptors	Distance from activity / prescribed premises
Nyalpa Pirniku Native Title Registration (discounted)	Nyalpa Pirniku was accepted for registration for Native Title however no current Native Title currently exists and no Indigenous Heritage areas are identified within 2km of the proposed prescribed premises. Screened out, no active Native Title on the property

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence 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.

Licence L9436/2024/1 that accompanies this decision report authorises emissions associated with the operation of the premises i.e. category 6 activities.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

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

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation								
Screening, crushing, unloading, loading and storage of material Vehicle movements	Dust	<p>Pathway: Dust generated via activity being transported offsite with aid by wind to the receptor.</p> <p>Impacts: Deposition on vegetation impacting the photosynthesis process resulting in impacts to vegetation health. Amenity – Goldfields HWY</p>	Native vegetation particularly Threatened and Priority Flora Goldfields hwy	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1 Condition 2	N/A
Excess water used for dust control during all onsite activity including stockpile dust management, and large rainfalls creating stormwater	Sediment laden water runoff	<p>Pathway: Sediment transported offsite via excess water runoff.</p> <p>Impacts: Degradation of adjacent and nearby</p>	Native vegetation particularly Threatened and Priority Flora	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	N/A

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		native vegetation via smothering.						
Hydrocarbon spills / leaks from plant and/or spills while refueling	Hydrocarbons	Pathway: Direct discharge to land Impacts: Contamination of soil and/or damage to native vegetation	Adjacent native vegetation	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 1	N/A

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.



4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 13 May 2024.	None received.	N/A
Local Government Authority (Shire of Menzies) advised of proposal on 13 May 2024.	None received.	N/A
Applicant was provided with draft documents on 4 th June 2024	Applicant had no comments and waived the comment period on 10/6/2024	Noted.

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence 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. Holcim (Australia) Limited, 16 April 2024, *Holcim Comet Vale Licence Application*, Perth, Western Australia, Doc 240416.
5. Holcim 2017a, SHE Element & Guideline 6.08: Air Emissions
6. Holcim 2017b, SHE Element & Guideline 6.09: Holcim 2017c, SHE Element & Guideline 6.11: Storage of Liquid Fuels & Chemical