



## Application for a Licence Amendment

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

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**Works Approval Number** L4533/1967/15

**Applicant** Cockburn Cement Limited

**ACN** 008 673 470

**File Number** APP-031715

**Premises** Cockburn Cement Limited Munster  
  
Being Lot 450 on Plan 249735 Rockingham Rd, Lot 50 on Diagram 6065, Lot 88 on Plan 22127, Lot 246 on Plan 226117, Lot 5 and Lot 4 on Diagram 18525 and Lot 311 on Plan 300770 Russell Road, MUNSTER 6166

**Date of Report** 8 June 2026

**Decision** Licence Amendment Granted

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## 1. Decision summary

This Amendment Report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operations of the lime kiln dust (LKD) prilling infrastructure. As a result of this assessment, Licence L4533/1967/15 has been amended to authorise the ongoing use of the LKD prilling infrastructure.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this Decision Report, the Department of Water and Environmental Regulation (department, DWER) has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://www.wa.gov.au/service/building-utilities-and-essential-services/integrated-essential-services/dwer-regulatory-documents>.

### 2.2 Application summary

On 1 October 2025, Cockburn Cement Limited (CCL) submitted an application for a licence amendment to the department under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

CCL currently operates a lime manufacturing plant (category 43: Cement or lime manufacturing) on Russell Road in Munster (the premises). The plant has two operational lime kilns and is authorised to operate under Part V of the EP Act by licence L4533/1967/15. The application is for the operation of the infrastructure that that was installed under works approval W6817/2023/1 that enables LKD to be disposed in an alternate manner. The infrastructure allows the LKD to be processed to less fine material by prilling it to form conglomerated spheres of LKD. CCL expect the prilling of LKD prior to disposal will help reduce dust emissions from the LKD disposal area as the prilled LKD material will hold together in a sphere, resulting in less free particulate matter likely to become windblown compared with un-prilled LKD.

The department has considered the infrastructure and equipment relating to the proposed works in line with *Guideline: Risk Assessments* (DWER 2020) and these were assessed under Works Approval W6817.

A more detailed overview of the premises, including the lime manufacturing process used by CCL is provided in the decision report for licence L4533/1967/15 published on the Department of Water and Environmental Regulation (DWER) on its website at <https://www.der.wa.gov.au/our-work/licences-and-works-approvals/current-licences>.

### 2.3 Infrastructure and operational aspects

CCL currently operates two lime kilns, kiln 5 and kiln 6, on the premises. Both kilns have baghouse dust filters that filter out dust known as lime kiln dust (LKD) from the kiln stack exhaust gases.

The bag houses collect the dust which is then transferred to a dedicated storage silo. LKD from the storage silo is loaded into pneumatic trucks and transported to the LKD disposal area where it is mixed with extracted groundwater to create a slurry which is pumped via cannons into the LKD disposal area.

When the LKD dries out it poses a risk of dust emissions as it is a very fine material. CCL has installed sprinklers around the boundary of the LKD disposal area which are operated to reduce dust emissions arising from the area.

CCL is proposing to continue to 'prill' the LKD by adding water to the LKD and mechanically

agitating it to form small, conglomerated spheres of prilled LKD prior to disposal with the aim of reducing the risk of dust emissions.

The infrastructure was constructed under works approval W6817/2023/1 and on 20 December 2023 CCL submitted the compliance documents for its construction.

The infrastructure has been operating under time limited operations as authorised by the works approval since 21 December 2023.

### 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 *Gridline: 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 the operation of the prilling infrastructure that have been considered in this Amendment 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
<b>Operation</b>			
Dust	Operation of LKD prilling infrastructure	Air/windborne pathway	<p>Comprises fully enclosed auger/screws/chutes and an auger style DustFix 80 prilling system which allows water to be added to LKD through a mixing shaft.</p> <p>The prilling system has continuous moisture monitoring via a sensor.</p> <p>Moisture content of prilled LKD is expected to be between 12-15%.</p> <p>Prilled LKD to be a solid spheres less likely to generate dust as there will be less free particulate matter.</p>
	Loading of prilled LKD into tipper trucks		<p>Prilled LKD to be in damp state.</p> <p>Loading chute/sock connected to a dust extraction system with a baghouse fitted with a pulse jet air cleaning system which returns collected dust to the prilling feed.</p> <p>Loading area will be partially enclosed comprising an existing concrete pad with walls on the eastern and western side with an automatic roller door to be installed on the northern end to limit wind exposure.</p> <p>Loading will be via a telescopic loading sock lowered into trucks when loading occurs.</p> <p>Loading area to be swept with street sweeper as required.</p>

Emission	Sources	Potential pathways	Proposed controls
	Transport of prilled LKD		LKD to be transported in a damp state. Roads to be wet down as required.
	Deposition of prilled LKD		Prilled LKD to be deposited in a damp state. Water cart/cannon to be used if dust lift off is observed during deposition of prilled LKD. The licence currently contains requirements for CCL to monitor ambient dust at boundary monitors and to inspect potential dust sources and where dust emissions from the premises are identified to take action to mitigate the dust. This includes visually inspecting the LKD disposal area and cease dust generating activities, application of a dust suppressant, activation of the water misting and/or sprinkler system.
Noise	Operation of LKD infrastructure	Air pathway	The LKD prilling infrastructure is designed to operate at less than 80dB and is located approximately 750 m from the nearest residential receptor.

### 3.1.2 Current licence conditions that relate to dust emissions

The premises is currently licensed by L4533/1967/15 which contains conditions that relate to the control of ambient dust emissions including:

- operation of boundary ambient dust monitors;
- actions to be taken if monitors exceed the limits on the licence;
- daily inspections of likely sources of ambient dust including the LKD disposal area; and
- all dust collected from hoppers including LKD is disposed of to the LKD disposal area in a wet state.

### 3.1.3 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the applicant's 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* (DER 2016)).

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

Human receptors	Distance from prescribed activity
Residential receptors	750m from LKD prilling infrastructure and truck loading area
Residential receptors	570m from the prilled LKD deposition area
Environmental receptors	Distance from prescribed activity
No Environmental receptors likely to be impacted by the prilling of LKD within 1 km of the prilling infrastructure	>1km



**Figure 1: Distance to residential receptors from the LKD prilling infrastructure and the LKD disposal area**

## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DER 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 incomplete 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 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 W6817 authorised the construction and time-limited operations (including commissioning) to allow the infrastructure to be trialed for the reduction of dust. The conditions in the issued Licence Amendment, 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 operation of the LKD prilling infrastructure**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of Licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
<b>Operation</b>								
Operation of LKD prilling infrastructure	Dust emissions	Air/windborne pathway causing wide scale unreasonable dust emission impacts on receptor amenity	Nearest residential area 750m north of the proposed Prilling infrastructure and loading area	Refer to Section 3.1	C = Slight L = Rare <b>Low Risk</b>	Y	39	CCL has installed the LKD prilling infrastructure that it believes will result in reduced community dust impacts by reducing the amount of free fine particulate material in the LKD. The delegated officer has determined that the proposed changes will not increase the previously assessed risk of impacts from dust emissions, subject to the applicant's proposed controls. <b>Applicant proposed controls</b> Prilling takes place in enclosed infrastructure with moisture monitoring to achieve a moisture content of at least 12% or if less it prills will be dust free when exiting the prilling machine. The delegated officer considers this control to be critical to controlling dust so has included as requirements in the licence as condition 36. The delegated officer notes that CCL can resort to the current LKD disposal method using pneumatic trucks and disposing of the LKD in a wet state (slurry) if there is an increase in dust due to the prilling operations.
Loading of prilled LKD material into tipper trucks					C = Slight L = Rare <b>Low Risk</b>	Y		<b>Applicant proposed controls</b> The loading infrastructure is equipped with a dust extraction system with a bag house. Prilled material is loaded to trucks using a telescopic loading sock and the are to be cleaned to prevent dust accumulation. The delegated officer considers these controls to be critical to controlling dust so has included them in the works approval as condition 36 and authorised the baghouse emission point through amending condition 3. A maintenance control relating to the maintenance of baghouse filters was included in condition 36 by the delegated officer to ensure they are appropriately maintained to achieve effective operation and control of dust emissions.
Transport of prilled LKD material			The nearest point of the transport route is approximately 570m from residential receptors		C = Minor L = Unlikely <b>Medium Risk</b>	N		<b>Applicant proposed controls</b> Prilled LKD material will be transported in a damp state to the LKD disposal area and will be in spheres that are less likely to become wind blown when disposed of to the LKD disposal area. The delegated officer considers these controls to be critical to controlling dust so has included them in the works approval in condition 36. <b>Additional control</b> The delegated officer has also included a condition to ensure that trucks transporting the prilled material have their trailers covered as there is a risk of the material drying out and creating dust during transport.
Deposition of prilled LKD material			The point that LKD will be disposed of is approximately 570m from residential receptors		C = Minor L = Possible <b>Medium Risk</b>	Y		39 <b>Applicant proposed controls</b> Prilled material is deposited to the LKD disposal area in a damp state. A water cart is available to wet down the tipping area. The delegated officer considers these controls to be critical to controlling dust so has included them in the licence in conditions 36.

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

Licence: L4533/1967/15

Date of amendment: 8 June 2026

## 4. Consultation

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

**Table 4: Consultation**

Consultation	Comments received	Department response
<p>Application advertised on the department's website (29/10/2025)</p> <p>Letters sent out to registered Stakeholders on 29/10/2025</p>	<p>The Department received 41 responses from community members, issued raised included:</p> <ul style="list-style-type: none"> <li>• Air quality from the entire facility</li> <li>• Odour</li> <li>• Dust</li> <li>• Noise</li> </ul>	<p>This proposal does not relate to air emissions other than the use of the LKD prilling infrastructure and potential reduction of dust from the LKD disposal area.</p> <p>LKD is not an odorous material.</p> <p>The proposal is likely to reduce dust emissions associated with disposal of LKD on the premises.</p> <p>Noise from the LKD prilling infrastructure is not inherently noisy and expected to comply with the noise regulations.</p>
<p>Local Government Authority advised of proposal (29/10/2025)</p>	<p>The City of Cockburn advised that no development application is required and that the City is supportive of the proposal.</p>	<p>The Department notes the LGA response.</p>
<p>Applicant comments on draft Works Approval and Decision Report Documents.</p>	<p>The applicant responded on 21 May 2026. The applicant requested amendments as summarised in Appendix 1.</p>	<p>Refer to Appendix 1.</p>

## 5. Decision

The Delegated Officer has determined to amend licence L4533/1967/15 to include the LKD prilling infrastructure.

In determining to amend the licence, the Delegated Officer took into account the following:

- the applicant has proposed controls which are considered suitable to mitigate risk of dust emission impacts associated with the activity and the prilled material is likely to be less of a dust risk given its denser nature making it less likely to become windblown;
- the LKD prilling is not considered likely to result in an increased risk of dust emissions and dust impacts in the community, subject to the controls applied to the licence;
- the licence holder is subject to ambient dust monitoring requirements via licence L4533/1967/15, which include:
  - premises boundary dust monitoring with limits that require management actions to control dust emissions;
  - management actions for dust sources on site if boundary monitoring shows an exceedance and the source has been identified as contributing to ambient dust; and
  - daily visual monitoring of ambient dust sources including the LKD disposal area.
- the premises will be subject to ongoing compliance inspections and investigations following incidents and complaints, in accordance with the EP Act; and
- the applicant can revert back to the previous LKD disposal methods if the LKD prilling becomes a dust issue.

## 6. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined the licence is amended, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

## References

1. Department of Environment Regulation (DER) 2016, *Guideline: Environmental Siting*, Perth, Western Australia.
2. DWER 2017, *Guideline: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Cockburn Cement Limited 2025, Application for licence amendment (L4533) and supporting documentation (DWER Reference APP-0031715 - Application folder).

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

Condition	Summary of applicant’s comment	Department’s response
5 – Table 2	The LKD system has a dust collector which is sized similarly to the low-level sources. It’s a lot smaller than the bag houses on the kiln stacks and we would suggest that it is more suitable to be included in Schedule 8.	Noted. The delegated officer has determined to include the LKD baghouse in schedule 8 as a low level source of dust emissions.
13	Suggest that “ <i>and LKD prilling baghouse</i> ” could be removed if included in the low-level sources	The LKD prilling baghouse has been excluded from the requirements of condition 13 as it is considered a low level source.
39 – Table 6 Row 2	Suggest that “tipper” is removed from “tipper trucks” as the product may also be transported in other truck types (such as live bottom trucks). Suggest that “ <i>which reaches into the truck</i> ” could be removed as the telescopic sock is raised as the product is raised and would not always be inside the truck.	“Tipper” has been removed from “tipper trucks” to allow for the use of enclosed trucks.
	Suggest that “ <i>A street sweeper must be used as required to prevent dust accumulation within the loading area</i> ” is replaced with “ <i>The loading area must be kept free from dust accumulation</i> ” which leaves the methodology up to the site to manage	The condition has been reworded to ensure the LKD loading area is cleaned as necessary to allow flexibility in how the area is cleaned.
39 – Table 6 Row 3	Suggest that this condition be removed as it is already conditioned in 3)a) by Condition 5	<p>Table 6 Row 3 Point ‘a’ ensures that the baghouse is in operation while prilled LKD is being loaded.</p> <p>Condition 5 is worded as below:  <i>The Licensee must ensure that pollution control equipment in Table 2. <b>Error! Reference source not found.</b> is operational for the purpose of lime manufacturing and product storage, should waste be emitted from the discharge points.</i></p> <p>As emissions are unlikely to be discharged from the bag house emission point if the bag house is not in operation, condition 5 does not appropriately cover the requirement of ensuring the baghouse is in operation when prilled LKD is being loaded. The condition has been retained as per the draft version.</p>

Condition	Summary of applicant's comment	Department's response
39 – Table 6 Rows 4 and 5	Suggest that these conditions be removed as on-site transport and disposal activity is already conditioned in the "Ambient Dust" section of the licence, in Conditions such as 28, 29, 30, 33	<p>These requirements are specific to the transport and unloading of LKD in the LKD disposal area to proactively ensure this activity does not result in dust emissions</p> <p>Conditions 28 requires action to be taken when dust monitoring indicates exceedances of 1 hr and 24hr limits rather than proactively taking measures to mitigate dust emissions.</p> <p>Condition 29 requires a once a day inspection for potential dust sources and control measures and does not directly manage dust generation from the transport and deposition of prilled LKD.</p> <p>Condition 30 relates to the deposition of LKD in a wet state where prilled LKD is required by condition 39 to be transported to the disposal area in a damp state.</p> <p>Condition 33 relates to feedstocks and not to controlling dust from prilled LKD.</p> <p>Rows 4 and 5 of table 6 have been retained as per the draft documents.</p>
Updated Premises Plan B	CCL has no objection to showing where the LKD prilling infrastructure is located, noting that there is no significant emission point (unlike the kilns) and we also have no objection to not changing the existing plan at the discretion of the regulator.	Noted. The licence was updated to show the LKD prilling infrastructure (Premises Plan B). The map of emission points has not changed.