



Application for Works Approval

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

Works Approval Number W6661/2022/1

Applicant EcoGraf Limited

ACN 117 330 757

File number DER2022/000049

Premises Battery Anode Material Facility
Corner of Zirconia Drive and Alumina Road
EAST ROCKINGHAM WA 6168

Legal description
Lots 1 and 2 on Deposited Plan 404186
As defined by the premises maps attached to the issued works approval

Date of report 20/09/2022

Decision Works approval granted

Table of Contents

1. Decision summary	4
2. Scope of assessment	4
2.1 Regulatory framework	4
3. Application summary	4
3.1 Premises and process overview	4
3.2 Construction and Commissioning	5
4. Applicant emission assessments	5
4.1 Air emissions	5
4.1.1 Results	6
4.1.2 DWER technical review	6
4.2 Noise emissions	7
4.2.1 Noise model	7
4.2.2 Results	7
4.2.3 DWER technical review	7
5. Risk assessment	8
5.1 Source-pathways and receptors	8
5.1.1 Emissions and controls	8
5.1.2 Receptors	9
5.2 Risk ratings	9
6. Consultation	13
7. Works approval conditions	13
8. Decision	13
9. Future licence conditions	14
10. References	14
Appendix 1: Application validation summary	15

Table 1: Key emission sources	5
Table 2: Screening test results	6
Table 3: Predicted sound level at various receivers	7
Table 4: Proposed applicant controls	8
Table 5: Sensitive human and environmental receptors and distance from prescribed activity	9
Table 6: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation	11
Table 7: Consultation	13

No table of figures entries found.

1. Decision summary

Ecograf Limited (applicant) applied for a works approval under Division 3 Part V of the *Environmental Protection Act 1986* (EP Act) on 31 January 2022. The applicant proposes to establish a battery anode material facility in East Rockingham (premises).

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during construction and operation of the premises. As a result of this assessment, works approval W6661/2022/1 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>.

3. Application summary

In January 2022, the applicant submitted an application for a works approval to the department under section 54 of the EP Act.

The application is to establish a battery anode material facility at the premises which is to be located on the corner of Zirconia Drive and Alumina Road in East Rockingham.

The premises relates to category 33: Chemical manufacturing at the assessed design capacity of 11,000 tonnes per annum (tpa) which is specified on the works approval. 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 the works approval.

The scope of the application is for stage 1 of the applicant's proposed facility. The applicant highlighted proceeding to a stage 2 in the future, however this will be the subject of a future works approval application and beyond the scope of this assessment and what is authorised in a works approval.

The delegated officer noted that the applicant provided summary information in relation to greenhouse gases (GHG). GHG's categorised as Scope 1 emissions are estimated at 19,813 tCO₂e/year for the first stage of the project (i.e. the scope of this assessment). The delegated officer did not further consider GHGs as they are beyond the current scope of regulation under Part V of the EP Act and below the 100,000 CO₂-e/year threshold specified in the EPA's *Environmental Factor Guideline – Greenhouse Gas Emissions*.

3.1 Premises and process overview

The applicant will use imported graphite concentrate flakes to produce battery grade graphite spheres of 10 µm and 16 µm sizes. The imported graphite is approximately 97% pure and the final product will be 99.96% pure. The facility will consume approximately 10,000 tonnes of graphite to produce 5,000 tonnes of spheres and 5,000 tonnes of graphite fines as a by-product.

Bagged flakes of graphite concentrate are to be received in shipping containers. The bags will be discharged to feed silos via a hopper inside a three-sided shed. The hopper includes a rubber seal against the bottom of the bag to minimise dust. The concentrate will be sized and shaped through a series of micronizing and spheronising mills. Each mill is connected to a cyclone for particulate removal.

Fines from the cyclones will be captured in fines baghouses and directed to a fines silo and fed to a

bagging plant. Bagged fines will be loaded into a container for shipping.

The spherical graphite is combined with sodium hydroxide (NaOH) and baked in a kiln at 500°C for 30 mins and then placed in a quench tank. Waste gases containing carbon monoxide (CO), oxides of nitrogen (NOx), sulfur dioxide (SO₂) and hydrogen sulfide (H₂S) from the kiln and alkaline quench tank pass through a scrubber prior to release to atmosphere. The spheres will then be subject to a series of acid washes with sulfuric acid (H₂SO₄). The final product will be dried using a flash drier and bagged and placed in a shipping container.

Three process wastewater streams are generated, one alkaline, one strong acid and one weak acid. The wastewater streams are then neutralised (including through partial self-neutralisation) for discharge to the Water Corporation sewer as trade waste.

3.2 Construction and Commissioning

The applicant will implement dust suppression during construction including water trucks on unsealed roads, access tracks, cleared areas and where dust generation is visible. Commissioning will involve the concurrent energisation of the mechanical shaping and purification plants to ensure the plant can operate safely. The purification process will be commissioned in two stages firstly using water to commission the mechanical components and, once the system has been shown to run safely, the chemicals introduced. The wastewater treatment system will be commissioned prior to the graphite process.

4. Applicant emission assessments

4.1 Air emissions

The applicant engaged consultant SLR Consulting to undertake an Air Quality Impact Assessment.

Emissions from the plant consist of products of combustion from burning natural gas: Oxides of nitrogen (NOx) and negligible amounts of sulphur dioxide (SO₂) and carbon monoxide (CO). The NaOH kiln emissions will also include hydrogen sulphide (H₂S). Particulate matter (as PM₁₀ and PM_{2.5}) is produced from the milling and spheronizing process.

The key emission sources during operation are shown in Table 1:

Table 1: Key emission sources

Source	Control	pollutants	Emission rates
Milling and Spheronizing	4 Baghouses	PM ₁₀ , PM _{2.5}	PM ₁₀ 0.00073 g/s PM _{2.5} 0.00024 g/s
NaOH bake Kiln Exhaust	Alkaline Scrubber	NOx, H ₂ S, CO	NOx 0.0012g/s H ₂ S 0.041 g/s CO 0.047g/s
Boiler stack	NA	NOx, SO ₂ CO	NOx 0.00019 g/s
Rotary dryer stack	Off gas scrubber and baghouse	NOx, PM ₁₀ , PM _{2.5}	NOx 0.00022 g/s PM ₁₀ 0.00073 PM _{2.5} 0.00024

Emission rates were derived from pilot plant emissions and scrubber performance data from the manufacturer. The scrubber vendor data suggested emissions of H₂S will be below 0.5 ppm but the applicant used an upper level of 4 ppm for modelling purposes. The natural gas fuelled boiler is expected to have negligible emissions of SO₂ and CO.

A simple screening analysis designed to give a conservative estimation likely to be higher than actual ground level concentrations (GLC) was applied to the emissions. The calculated GLCs are compared to ambient air quality standards. The results of the screening test are outlined in Table 2.

Table 2: Screening test results

Pollutant	Averaging period	Screening test GLC $\mu\text{g}/\text{m}^3$	Standard ¹ $\mu\text{g}/\text{m}^3$	% Standard	Tolerance	Pass
PM ₁₀	24 hour	0.34	46	0.74	10	Yes
	Annual	0.043	23	0.19	1	Yes
PM _{2.5}	24 hour	0.11	23	0.47	10	Yes
	Annual	0.014	7	0.20	1	Yes
NO _x	1 hour	38	164	23	10	No
	Annual	1.4	31	4.5	1	No
H ₂ S	1 hour	0.51	2,560	0.02	10	Yes
	24 hour	0.14	137	0.1	3	Yes
	Annual	0.018	1.8	1	1	Yes

Note 1: Sourced from the draft *Guideline: Air emissions*

A combination of the WRF, CALMET and CALPUFF air dispersion models were used to assess the potential air quality impacts of NO_x emissions from the proposed facility. Ground level concentrations were added to background levels taken from South Lake AQMS monitoring station.

4.1.1 Results

Based on the screening the applicant undertook further detailed analysis of predicted NO_x impacts. The applicant's predicted maximum cumulative ground level concentrations for NO_x (calculated as NO₂) for modelled receptors was 55 $\mu\text{g}/\text{m}^3$ for a 1 hour average and 14 $\mu\text{g}/\text{m}^3$ annual average compared with Ambient Air NEMP guideline values 164 $\mu\text{g}/\text{m}^3$ and 31 $\mu\text{g}/\text{m}^3$ respectively.

The delegated officer noted that the predicted contribution of the battery anode material facility in isolation to the NO_x ground level concentrations was very low, a predicted maximum contribution of 0.31 $\mu\text{g}/\text{m}^3$ (receptor R5) for a 1 hour average and.

4.1.2 DWER technical review

A DWER technical review of the impact on air quality from the operation of the battery anode facility and found that:

- selection of models and weather data is appropriate;
- cumulative impacts have been considered;
- upset conditions were not considered in original submission, and;
- the technical basis of the emission data was not provided.
- consider emissions monitoring and validation once the project is in operation to confirm the applicant's predictions are correct.

The applicant subsequently provided a table of upset conditions and mitigation responses and information on the source of the input data.

The input data for the rotary dryer is based on a pilot plant and provides conservative estimates of outputs such as NO_x and CO however there is no estimate of dust output other than that provided by visual inspection. A stack test on commissioning should be considered.

Stack testing of the NaOH bake kiln should also be considered both at commissioning and periodically thereafter.

4.2 Noise emissions

4.2.1 Noise model

The applicant engaged SLR Consulting to prepare a Noise Impact Assessment. Noise modelling was conducted using *iNoise* which is ISO 17534 compliant software.

4.2.2 Results

The proposed facility will be a 24 hour operation meaning that noise must comply with the strictest night time criteria as prescribed by the *Environmental Protection (Noise) Regulations 1997*. The model considered the impact on the nearest residential premises to the south east and west of the premises as well as commercial industrial premises to the southeast and south of the premises. The model also considered the impact at the tow nearest industrial premises in the industrial area. Table 3 outlines the predicted noise levels at these sites.

Table 3: Predicted sound level at various receivers

Receiver	Criteria L _{A10, night} (dB)	Predicted L _{A10} (dB)
Residential Building southeast	38	31
Residential Building west	35	<25
Commercial/Industrial Building southeast	60/65	36
Commercial/Industrial Building south	60/65	35
Commercial/Industrial Building south	60/65	30
Commercial/Industrial Building south	60/65	36
Commercial/Industrial Building southwest	60/65	39
Industrial building within Kwinana Industrial Area	75	52
Industrial building within Kwinana Industrial Area	75	53
Industrial building within Kwinana Industrial Area	75	60

Table 3 shows that predicted results are compliant with nighttime criteria indicating that noise emissions from the facility are expected to be compliant during all operating periods.

4.2.3 DWER technical review

A DWER technical review of the noise impact assessment found that:

- the criteria quoted for the noise compliance assessment are correct;
- methodology of the noise modelling, including model inputs and assumptions, seems correct;
- the operation scenario and operation layout, as well as the baseline noise assessment, all seem reasonable; and

- the modelled noise levels and noise compliance assessment results also seem reliable.

DWER queried the assigned value of 109 dB(A) to the two forklifts because it seems high and an estimate of the effect of these forklifts operating outside continuously during night-time operations had the potential to breach noise levels at sensitive receptors. The applicant replied that proposed noise emissions for the forklifts was high in order to be conservative, but the assessment still assessed the impact at sensitive receptors as compliant. The applicant advised that broadband reversing alarms will be fitted to this equipment.

5. 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.

5.1 Source-pathways and receptors

5.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this decision report are detailed in Table 4 below. Table 4 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 4: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Earthworks and construction of plant and supporting infrastructure	Air / windborne pathway	Vehicles to observe speed limits and only use designated roads, tracks and parking areas Dust suppression (e.g. water trucks) on unsealed roads and access.
Noise			Separation distance of 1.6 km to sensitive receptors. Onsite equipment to be fitted with appropriate noise reduction devices.
Operation			
Dust	Unloading of graphite flakes, milling, drying and loading of product	Air / windborne pathway	Unloading will take place in shed with three enclosed sides. Rubber membrane on hopper to seal against bulk bags. Loading of product in enclosed negatively pressured shed. Dust extraction system on load shed. Cyclone dust capture from mills. Revers pulse jet vent filter will be used to collect dust from the milling system.

Emission	Sources	Potential pathways	Proposed controls
			Each stack equipped with continuous emissions monitoring systems(CEMS)
Noise	Vehicle and forklift operation, milling and other processes on site.	Air / windborne pathway	Field measurements to be taken during commissioning to confirm model predictions of noise emissions. Automatic door closing systems for vehicle and personal entrance to noisy areas. Insulated steel lining to buildings
Gaseous emission	NaOH bake Kiln, purifying and drying of product	Air / windborne pathway	Variable throat venturi followed by packed bed scrubber for kiln off gas. Eductor venturi followed by packed bed scrubber for dryer and quench tank. Periodic kiln gas monitoring. Should scrubber fail re-test gas on repair of scrubber.
Wastewater and stormwater	Chemical purifying of product. Rainfall	Direct discharge	All process wastewater to be contained for mixing and treatment prior to discharge to Water Corporation sewer. All stormwater to be collected and directed to on-site drainage swales via an oily water separator.

5.1.2 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 5 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 5: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential Premises	1.35 km west southwest
Environmental receptors	Distance from prescribed activity
Underlying groundwater (non-potable purposes)	3 metres to top of surficial aquifer
Threatened and Priority Ecological Community: Tuart (<i>Eucalyptus gomphocephala</i>) woodlands and forests of the Swan Coastal Plain.	On site and immediately adjacent.

5.2 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 5.1. 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 5.1), 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 6.

Works approval W6661/2022/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 6 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the premises i.e. chemical manufacturing. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

Table 6: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Construction								
Civil excavation, earthworks, vehicle movements on unsealed roads Construction of process plant and associated infrastructure.	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 1.35 kilometres west southwest.	Refer to Section 5.1	C = Minor L = Rare Low Risk	Y	NA	Separation distance and applicant controls sufficient to minimise risk
	Noise			Refer to Section 5.1	C = Minor L = Rare Low Risk	Y	NA	Separation distance and applicant controls sufficient to minimise risk
Commissioning and Operation								
Commissioning and operation of battery anode facility	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 1.35 kilometres west southwest.	Refer to Section 5.1	C = Minor L = Unlikely Medium Risk	Y	Conditions 1, 6	Baghouses to capture dust sufficient to minimise risk to neighbouring industrial use separation distance to sensitive receptor is also sufficient to minimise risk.
	Noise	Air / windborne pathway causing impacts to health and amenity	Residences 1.35 kilometres west southwest.	Refer to Section 5.1	C = Slight L = Unlikely Low Risk	Y	Conditions 1, 6	Most major plant housed in purposely constructed buildings that are expected to significantly reduce emissions and facilitate further mitigations if every required. Automatic closing doors Confirmation noise monitoring during commissioning. Separation distance to sensitive receptors. Modelling assessment is that noise will comply with

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								regulation criteria for all receptors at all operating periods.
	Wastewater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality		Refer to Section 5.1	C = Minor L = Rare Low Risk	Y	Conditions 1, 6	Wastewater is treated and discharged to sewer
	Gaseous Emissions H2S, SO2, NOx and CO	Air / windborne pathway causing impacts to health and amenity	Residences 1.35 kilometres west southwest. adjacent industrial premises	Refer to Section 5.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1,6	Predictions are that air emissions are well within relevant ground level concentration standards at receptors. Based on screening analysis, Nox was further assessed. Cumulative NOx was well within Ambient Air NEPM standards and negligible based on NOx emissions from the premises in isolation. Taking into account the input data sources and conservatism, the applicant will be required to validate air emissions and undertake ongoing monitoring of some pollutants.

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.

6. Consultation

Table 7 provides a summary of the consultation undertaken by the department.

Table 7: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 23 March 2022	None received	N/A
Local Government Authority advised of proposal on 28 March 2022	None received	N/A
Applicant provided with draft decision for comment 23 August 2022	Applicant responded on 19/09/2022 with no comments.	N/A

7. Works approval conditions

To minimise the potential for impacts to human health and the environment, the applicant proposed the following engineering controls, which will be imposed on the works approval because they are considered critical for maintaining an acceptable level of risk:

- emissions from the sizing and shaping mills will be directed through cyclones and baghouses;
- air emissions from the mill baghouses will be continuously monitored to detect spikes in particulate emissions;
- air emissions from the kiln, NaOH washer and H₂SO₄ washer will be directed through chemical scrubbers;
- air emissions from the rotary dryer to be tested at commissioning
- air emissions from kiln to be tested at commissioning and periodically after that, and;
- wastewater will be collected, neutralised and discharged to sewer.

The delegated officer is satisfied the above engineering controls and monitoring lower the overall risk profile of the facility, and adequately address the potential for unacceptable impacts to public health or the environment.

8. Decision

The delegated officer determined to grant a works approval, subject to conditions commensurate to the assessed risk of emissions and discharges. In general, the delegated officer considered the applicant's proposed controls were reasonable and requirements of the works approval generally reflect the applicant's proposed controls.

Conditions primarily relate to managing the risk of air emissions, wastewater and that the predicted level of noise emissions is achieved. The works approval will require the applicant to validate air emissions during commissioning and then allows a six month period of time limited operations while the applicant applies for a licence.

In terms of the key risks (air emissions, wastewater and noise), the delegated officer noted that air emissions are predicted to be well within relevant air quality standards, treated wastewater

is to be discharged to Water Corporation sewer and infrastructure is to be designed such that major noise components are within purpose-built buildings.

At the completion of construction and commissioning phases, the applicant will be able to apply for a licence in respect of the operational phase of the premises. The applicant will need to apply for a licence at the commencement of time limited operations.

9. Future licence conditions

The delegated officer has assessed the risk of operational phase emissions in this assessment and expects that conditions on a future licence will be consistent with time limited operations phase conditions on the works approval and include ongoing monitoring requirements for air emissions. However, assessment of the licence application and a final decision on any conditions for a licence will have regard to any reporting under the works approval, commissioning phase validation monitoring data and information in a licence application.

10. 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.

Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY		
Application type		
Works approval	<input checked="" type="checkbox"/>	
Date application received	31/1/2022	
Applicant and Premises details		
Applicant name/s (full legal name/s)	EcoGraf Limited	
Premises name	EcoGraf Battery	
Premises location	Lot 2 on Plan 404186	
Local Government Authority	City of Rockingham	
Application documents		
HPCM file reference number:	DWERDT556423	
Key application documents (additional to application form):	Supporting Document: <i>Battery Anode Material Facility Works Approval Application EcoGraf Limited 31 January 2022.</i> Graphite Recycling and Manufacturing Facility Noise Impact Assessment Air Quality Impact Assessment Graphite Recycling and Manufacturing Facility Site Drawings	
Scope of application/assessment		
Summary of proposed activities or changes to existing operations.	Construction of Category 31: Chemical Manufacturing Facility Operation of Battery Anode Material Facility	
Category number/s (activities that cause the premises to become prescribed premises)		
Table 1: Prescribed premises categories		
Prescribed premises category and description	Proposed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 31: <i>Chemical Manufacturing facility</i>	11 000 tonnes per annum	NA
Legislative context and other approvals		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input checked="" type="checkbox"/> Expiry:

Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	Approval: Applications submitted
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Clearing native vegetation is permitted by Ministerial Statement number 863 Rockingham Industrial Zone Strategic Environmental Assessment
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Kwinana EPP (air quality)
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	NA
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	NA