



## Application for Works Approval

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

---

**Works Approval Number** W6756/2022/1

**Applicant** Holcim (Australia) Pty Ltd

**ACN** 099 732 297

**File number** DER2022/000590

**Premises** Holcim (Australia) Pty Ltd – Mobile 12, Mt Keith Batching Plant  
Mining Tenement M 36/9  
Goldfields Highway  
WILUNA WA 6646  
  
As defined by the premises map attached to the issued works approval

**Date of report** 15 February 2023

**Proposed Decision** Works approval granted

**Amine Fisher**

**A/Manager, Process Industries**

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

# Table of Contents

<b>1. Decision summary</b>	<b>1</b>
<b>2. Scope of assessment</b>	<b>1</b>
2.1 Regulatory framework	1
2.2 Application summary and overview of premises	1
<b>3. Risk assessment</b>	<b>1</b>
3.1 Source-pathways and receptors	2
3.1.1 Emissions and controls	2
3.1.2 Receptors	4
3.2 Risk ratings	5
<b>4. Consultation</b>	<b>8</b>
<b>5. Conclusion</b>	<b>8</b>
<b>References</b>	<b>8</b>
<b>Appendix 1: Application validation summary</b>	<b>9</b>

Table 1: Proposed applicant controls	2
Table 2: Sensitive human and environmental receptors and distance from prescribed activity	4
Table 3: Risk assessment of potential emissions and discharges from the premises during construction and operation	6
Table 4: Consultation	8

# 1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, works approval W6756/2022/1 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>.

### 2.2 Application summary and overview of premises

On 28 October 2022, Holcim (Australia) Pty Ltd (the applicant) submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake construction works relating to the establishment of a mobile concrete batching plant at mining tenement M 36/9, Goldfields Highway, Wiluna (the premises). The premises is approximately 83 km south-south-east of the town of Wiluna.

The premises relates to category 77 concrete batching and cement products manufacturing with a proposed production capacity of 20,000 tonnes per annum under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W6756/2022/1. 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 works approval W6756/2022/1.

The mobile concrete batching plant will be located at the applicant's existing registered Mt Keith Concrete Batching Plant premises (R215/1996/1) which is located within mining tenement M36/9 and is operated by the applicant. The applicant proposes to use the mobile concrete batching plant for the purpose of supplying a maximum of 20,000 tonnes of concrete to BHP Mt Keith Debottlenecking Project for a period of 12 months (January to December 2023). The applicant proposes to decommission and remove the mobile concrete batching plant following the completion of the BHP project. The mobile concrete batching plant is proposed to produce approximately 20m<sup>3</sup> of concrete per day.

The mobile concrete batching plant will comprise a cement silo, weigh hopper and conveyors. The existing stockpile storage bins on the premises will be utilised for storage of aggregate and sand when delivered and existing front-end loaders will feed the aggregate and sand into the weigh hopper. Other temporary infrastructure which will be established on the premises includes a loadout concrete hardstand and wedge pit, concrete loadout apron, 2 x 165kva portable generators, 2 x 50kL chilled water tanks and a chiller. Runoff and sediment from the concrete loadout bay hardstand will be directed to the loadout wedge pit. The existing slump stand, truck wash catchment area and washout wedge pit will be utilised for washing excess dust and/or concrete from concrete agitator trucks.

## 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 construction and 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.

The applicant advised that the mobile concrete batching plant will be constructed and operated in accordance with the *Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998* (Concrete Batching Regulations). Reference to the requirements of the Concrete Batching Regulations the applicant's proposed controls to comply with these Regulations.

**Table 1: Proposed applicant controls**

Emission	Sources	Potential pathways	Proposed controls
<b>Construction</b>			
Dust	Installation of mobile concrete batch plant on site, construction of concrete apron, loadout hardstand and associated wedge pit.	Air/ windborne pathway	Dust during construction will be managed using the following measures: <ul style="list-style-type: none"> <li>regular sweeping or hosing/watering down of roads within the premises;</li> <li>speed limits will be enforced on site.</li> </ul>
Noise	Vehicle movements.		Noise during construction will be managed using the following: <ul style="list-style-type: none"> <li>noise control measures will be implemented for vehicles (non-tonal reversing beepers) and other equipment;</li> <li>effective exhaust mufflers to be fitted on mobile and stationary equipment; and</li> <li>any community related noise complaints received will be investigated, recorded and a response submitted to the complainant.</li> </ul>
<b>Operation</b>			
Dust	Operation of mobile concrete batching plant and associated equipment. Delivery and storage of raw materials (existing bays and stockpiles). Operation of mobile equipment and vehicles.	Air/ windborne pathway	Dust during operation will be managed using the following measures: <ul style="list-style-type: none"> <li>control of dust from trafficable areas will be in accordance with regulation 4 of the Concrete Batching Regulations: <ul style="list-style-type: none"> <li>the batch plant will be monitored and loose materials will be swept, hosed down or cleared to minimise dust emissions; and</li> <li>where the existing facility is not either paved or sealed, it will be otherwise</li> </ul> </li> </ul>

Emission	Sources	Potential pathways	Proposed controls
			<p>treated to minimise dust releases.</p> <ul style="list-style-type: none"> <li>• Storage of raw materials will be in accordance with regulation 5 of the Concrete Batching Regulations. Existing storage bays on the premises, which are designed to minimise dust emissions, will be used or if additional capacity is required raw materials will be stored in stockpiles which are covered or kept damp with sprinklers to minimise dust emissions.</li> <li>• Material handling will be undertaken in accordance with regulation 9 of the Concrete Batching Regulations with all hoppers, conveyors, chutes, bucket elevators or transfer points, or areas used to load concrete agitator trucks either enclosed or fitted with dust prevention measures to prevent escape of visible dust. All split material during concrete batching will be immediately cleaned up in accordance with regulation 3.</li> <li>• Cement storage will comply with regulations 6, 7 and 8 of the Concrete Batching Regulations with concrete being stored within a horizontal storage silo fitted with a mechanical rapping or a reverse pulse air cleaning system, a level indicator with an audible alarm and a relief valve which all meet the requirements of the Regulations.</li> <li>• Inspection, testing, maintenance and operation of the silo and its air cleaning system will be undertaken in accordance with the requirements of regulation 6.</li> <li>• washing of vehicles to remove excess dust or concrete prior to leaving the premises.</li> <li>• speed limits will be enforced onsite.</li> </ul>
Noise			<p>Noise during operation will be managed using the following:</p> <ul style="list-style-type: none"> <li>• noise control measures will be implemented for vehicles (non-tonal reversing beepers) and other equipment;</li> <li>• effective exhaust mufflers to be fitted on mobile and stationary equipment; and</li> <li>• any community related noise complaints received will be investigated, recorded and a response submitted to the complainant.</li> </ul>
Contaminated wastewater or stormwater.	Washing of vehicles. Surface runoff from containment	Direct discharge to land from	All wastewater and stormwater draining off sealed or paved areas will be directed into the existing and new wedge pits.

Emission	Sources	Potential pathways	Proposed controls
	<p>infrastructure (storage bays) or loading bays.</p> <p>Overflow of wedge pits.</p> <p>Additives spillage during truck loading process.</p>	<p>containment infrastructure or runoff from the loading bay.</p>	<p>Based on a water balance the existing wedge pit has adequate capacity to contain expected wastewater and stormwater volumes from the existing and new mobile batch plant. Washout water will be directed into the existing wedge pit.</p> <p>The new wedge pit will have a capacity of 3,500 L which, based on a water balance, is sufficient to contain anticipated stormwater runoff from the loadout hardstand.</p>
Washout solids.			<p>Washout solids are removed from the washout pit by BHP personnel, as required (e.g., weekly).</p>

### 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.

The land use in the surrounding area is primarily industrial. The proposed premises is located within mining tenement M 36/9, adjacent to the BHP Nickel West Cliffs underground mining operation. The distances to the closest sensitive receptors to the premises are detailed in Table 2. The Delegated Officer considers that the distance to sensitive receptors is sufficient that they are unlikely to be impacted by emissions or discharges from the premises. They are included in the table to demonstrate their proximity from the premises.

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

Human receptors	Distance from prescribed activity
Airport and Mine Accommodation Village	2.35 km north of premises.
Environmental receptors	Distance from prescribed activity
Wanjarri Nature Reserve (ID 6051)	5 km east of premises
Violet Range (Preservance Greenstone Belt) Vegetation Complexes (banded iron formation) PEC	Approximately 8 km south of the premises
Wiluna Water Reserve	>80 km north of the premises.
Aboriginal and other heritage sites – Heritage Site ID 21492 and Site ID 21494 are located within the mining tenement M36/9 boundary but are not within the operational footprint.	Heritage Site ID 21492 and Site ID 21494 are located 550 m east-north-east and 600 m south-west of the operational footprint respectively.

## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and take 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 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 W6756/2022/1 that accompanies this decision report authorises installation of the mobile concrete batch plant. As the premises has an existing Registration R215/1996/1, following completion of construction/installation, no further authorisation is required for operation under Part V of the EP Act. Operation of the plant will however be required to meet the requirements of the Concrete Batching Regulations. The conditions in the issued works approval, 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 construction and operation**

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
<b>Construction</b>								
Installation of mobile concrete batch plant on site, construction of concrete loadout hardstand and associated wedge pit. Vehicle movements.	Dust	Air / windborne pathway causing impacts to health and amenity	No sensitive receptors in close proximity	Refer to Section 3.1	C = minimal impacts to amenity <b>Slight</b> L = Will probably not occur in most circumstances <b>Unlikely</b> <b>Low Risk</b>	Y	N/A	N/A
	Noise			Refer to Section 3.1	C = minimal impacts to amenity <b>Slight</b> L = likely to occur only in exceptional circumstances <b>Rare</b> <b>Low Risk</b>	Y	N/A	N/A
<b>Operation</b>								
Operation of mobile concrete batching plant and associated equipment. Delivery and storage of raw materials (existing bays and stockpiles). Operation of mobile equipment and vehicles.	Dust	Air / windborne pathway causing impacts to health and amenity	No sensitive receptors in close proximity	Refer to Section 3.1	C = minimal impacts to amenity <b>Slight</b> L = Will probably not occur in most circumstances <b>Unlikely</b> <b>Low Risk</b>	Y	Condition 1 to 3	N/A
	Noise			Refer to Section 3.1	C = minimal impacts to amenity <b>Slight</b> L = likely to occur only in exceptional	Y	N/A	N/A

Works approval: W6756/2022/1



Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
					circumstances <b>Rare</b> <b>Low Risk</b>			
Washing of vehicles. Surface runoff from containment infrastructure (storage bays) or loading bays. Overflow of wedge pits.	Contaminated wastewater or stormwater	Direct discharge to ground	Soil within the premises.  Two Heritage Sites (ID 21492 and Site ID 21494) located 550 m east-north-east and 600 m south-west of the operational footprint respectively.	Refer to Section 3.1	C = minimal onsite and offsite impacts <b>Slight</b> L = likely to occur only in exceptional circumstances. <b>Rare</b> <b>Low Risk</b>	Y	Condition 1 to 3	N/A
	Washout solids			Refer to Section 3.1	C = minimal onsite and offsite impacts <b>Slight</b> L = likely to occur only in exceptional circumstances. <b>Rare</b> <b>Low Risk</b>	Y	Condition 1 to 3	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.

Note 3: Conditions 2 to 6 of the works approval are all department imposed conditions required for compliance reporting and general complaint and record keeping requirements

## 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 23/11/2022 to 14/12/2022.	None received.	N/A
Local Government Authority (Shire of Leonora) advised of proposal on 25 November 2022.	None received.	N/A
Applicant was provided with draft decision for comment on 4 January 2023.	Applicant responded on 25 January and advised they have no comments.	N/A

## 5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that the applicant's proposal to construct and operate a mobile concrete batching facility at the premises, with a production capacity of 20,000 tonnes over a period of approximately 12 months, is not expected to pose an unacceptable risk of impact to public health or the environment subject to design and construction of the premises consistent with the risk assessment outcomes.

The delegated officer determined the applicant's proposed design and operational controls are sufficient to manage the risk of dust, noise and contaminated wastewater emissions and are expected to comply with the requirements of the Concrete Batching Regulations.

Works approval W6756/2022/1 that accompanies this decision report has been granted for a period of three years and authorises the installation of a mobile concrete batch plant subject to conditions commensurate with the applicant's proposed controls, and conditions necessary for compliance, administration, and reporting requirements. Registration R215/1996/1 for the existing concrete batching plant on the premises, and the requirements of the Concrete Batching Regulations will apply to the operation of the mobile concrete batching plant once constructed.

## 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*, Joondalup, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Joondalup, Western Australia.
4. Holcim Australia 2022, *Mt Keith Mobile Concrete Batching Plant Works Approval Application (including application form and attachments)*, received 28 October 2022 (DWERDT678971)

## Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)				
Application type				
Works approval	<input checked="" type="checkbox"/>			
Licence	<input type="checkbox"/>	Relevant works approval number:		None <input type="checkbox"/>
		Has the works approval been complied with?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Has time limited operations under the works approval demonstrated acceptable operations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Date report received:		
Renewal	<input type="checkbox"/>	Current licence number:		
Amendment to works approval	<input type="checkbox"/>	Current works approval number:		
Amendment to licence	<input type="checkbox"/>	Current licence number:		
		Relevant works approval number:	N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:	None	<input type="checkbox"/>
Date application received	28 October 2022			
Applicant and premises details				
Applicant name/s (full legal name/s)	Holcim (Australia) Pty Ltd			
Premises name	Holcim (Australia) Pty Ltd – Mobile 12 Mount Keith Batching Plant			
Premises location	Mining Tenement M36/9 Goldfields Highway <b>WILUNA WA 6646</b>			
Local Government Authority	Shire of Leonora			
Application documents				
HPCM file reference number:	DER2022/000590			
Key application documents (additional to application form):	<ul style="list-style-type: none"> <li>• <i>Holcim Letter of Authority to sign WAA</i></li> <li>• <i>Letter of Op Control (Attachment 1A)</i></li> <li>• <i>ASIC Company Extract (Attachment 1B)</i></li> <li>• <i>Map of Premises and site layout (Attachment 2)</i></li> <li>• <i>Works Approval Application (Attachment 3B)</i></li> <li>• <i>DER Registration R2 15-1996-1 (Attachment 5)</i></li> <li>• <i>Siting and Location (Attachment 7)</i></li> <li>• <i>Environmental Risk Assessment (Attachment 8)</i></li> </ul>			

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)		
		<ul style="list-style-type: none"> <li>WAA Fee Calculation (Attachment 9)</li> </ul>
Scope of application/assessment		
Summary of proposed activities or changes to existing operations.	<p><b>Works approval</b></p> <p>Installation of mobile concrete batching plant onto Mt Keith Concrete Batching Plant, a registered premises (R215/1996/1) for concrete batching, supplying concrete to BHP Mt Keith Debottlenecking Project.</p> <p>The mobile concrete batching plant will only operate for a period of 12 months (January to December 2023) to supply a maximum of 20,000 tonnes of concrete to BHP Mt Keith Debottlenecking Project.</p>	
Category number/s (activities that cause the premises to become prescribed premises)		
Table 1: Prescribed premises categories		
Prescribed premises category and description	Proposed production capacity	
<b>Category 77:</b> Concrete batching or cement products manufacturing.	Maximum 20,000 tonnes of concrete per year.	
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 checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input checked="" type="checkbox"/> Expiry: A letter from BHP, the holder of mining tenement M36/9, providing operational control to the applicant to operate the proposed mobile concrete batching plant.
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Approval: N/A Expiry date: If N/A explain why? This application is to install a mobile concrete batching plant on an

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)		
		existing fixed concrete batching plant site (Mt Keith Concrete Batching Plant) to supply BHP Debottlenecking Project for a temporary period (January – December 2023).
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"/>	CPS No: N/A No clearing is proposed.
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"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
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"/>	Application reference No: N/A Licence/permit No: N/A 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 Type: N/A Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <a href="#">WQPN 25</a> )? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

**SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)**

Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	Classification: N/A Date of classification: N/A
---	--	--