



Application for Works Approval

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

Works Approval Number	W6935/2024/1
Applicant	Ransberg Pty Ltd
ACN	009 468 464
File number	DER2024/000161
Premises	WA Premix Bayswater Concrete Plant 277 – 279 Collier Road, Bayswater Legal description Lot 2 on Deposited Plan 55129 Certificate of Title Volume 1513 Folio 583 As defined by the premises maps attached to the issued works approval
Date of report	13 February 2025
Decision	Works approval granted

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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 the construction and operation of new wash out facilities at the existing WA Premix Bayswater Concrete Plant and associated with an extension to the premises operating hours. Compliance with the Environmental Protection (Concrete Batching and Cement Products Manufacturing) Regulations 1998 (Concrete Batching Regulations) which apply to the operational aspects of the premises were assessed. As a result of this assessment, works approval W6935/2024/1 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 [DWER Regulatory documents | Western Australian Government \(www.wa.gov.au\)](https://www.wa.gov.au/government/publications/dwer-regulatory-documents).

2.2 Application summary and overview of premises

On the 17 April 2024, Ransberg 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 construction of a new wash stand and washout bins (also referred to as washout pits) at the WA Premix Bayswater Concrete Plant, an existing registered premises (R2475/2018/1) located at 277 – 279 Collier Road, Bayswater, Western Australia (the premises). The wash stand and washout bins will replace a concrete reclaimer unit previously in use at the premises. The applicant also proposes to expand the operating hours of the premises from the current timeframe of 6am to 6pm Monday to Saturday, to a maximum twelve-hour operating period between the hours of 4am and 6pm Monday to Saturday. Structural noise controls have been proposed in the application associated with the operational hours change to support continued compliance with the Environmental Protection (Noise Regulations) 1997.

The premises is situated within a general industry zoned area within the City of Bayswater . The premises relates to category 77: concrete batching or cement products manufacturing and has an assessed design capacity of 365,000 tonnes/year under Schedule 1 of the Environmental Protection Regulations 1987 (EP Regulations) which are defined in works approval W6935/2024/1. The applicant proposes a production throughput of 100,000 tonnes/year for concrete batching operations. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with the *Guideline: Risk Assessments* (DWER 2020) are outlined in works approval W6935/2024/1.

The premises was originally constructed with a concrete reclaimer unit onsite to separate sand, aggregates and water from returned concrete during truck washout. The applicant stated that this system has not performed well under Australian conditions and requires replacement. The applicant proposes to replace the reclaimer unit with a wash stand and two washout bins, to collect returned concrete and truck washings. Collected concrete will be taken offsite for reuse and resale by the WA Limestone Group. No material is proposed to be disposed to landfill.

2.2.1 Exclusions

The applicant also detailed the proposed replacement and upgrade of dust monitoring equipment on the premises within the application. These changes are considered out of scope for the assessment, as the premises registration R2475/2018/1 is not subject to conditions therefore does not specify any ongoing monitoring requirements, nor do the Concrete Batching Regulations specify such

requirements. These aspects of the application are appropriately managed under local government planning approvals therefore are not considered further.

2.2.2 Concrete Batching Regulations

The delegated officer considered the applicant's proposed design and operation of the truck washout facilities against relevant requirements of the Concrete Batching Regulations as set out in Table 1. Based on this information the changes to the premises are expected to comply with relevant requirements of the Concrete Batching Regulations if constructed and operated as proposed in the application.

Table 1: Applicant controls compared to Concrete Batching Regulations

Concrete Batching Regulations	Applicant Controls
Regulation 3: Minimisation of dust	<p>On site personnel to be trained on dust management and maintain good standard of housekeeping.</p> <p>All surfaces within the concrete batching plant operations to be sealed with concrete/asphalt.</p> <p>Road sweepers and/or watering will be employed as necessary to clean dust causing material from yard surface.</p>
Regulation 4: Control of dust from trafficable areas	<p>Vehicle speeds restricted to no more than 10 km/hr. Water cart will be used when necessary on site.</p> <p>Truck operators required to inspect their vehicle and concrete loads prior to departing site and ensure vehicle is free of slurry and dust.</p> <p>All trucks will be washed at the wash stand prior to leaving the premises.</p>
Regulation 10: Cement product manufacturing premises to be cleaned	<p>On site personnel will be trained on dust management and maintain good standard of housekeeping.</p>
Regulation 11: Control of wastewater	<p>Agitator truck and bowl washing will be undertaken at designated locations (wash stand and washout bins). This area drains separately to the remainder of the site to an existing adjacent wedge pit.</p> <p>All water used in the washing of trucks will be collected and recycled back into the plant or used for truck washing.</p> <p>Solids and liquids from agitator truck bowl washing will be discharged into the two new washout bins.</p> <p>Sediment traps installed in front of stormwater basins to reduce sediment build-up within the basins and reduce maintenance requirements.</p>
Regulation 12: Slurry pits, settling ponds, silt traps and oil interceptors	<p>The wedge pit will not be allowed to dry out except where necessary to remove accumulated material.</p> <p>Washout bins and the wedge pit will be periodically cleaned to prevent excessive build up and maintain capacity.</p> <p>Settled material will not be allowed to accumulate higher than 30cm below the top of the pit/bin walls.</p>
Regulation 13: Disposal of waste	<p>All wastewater from washout bins and wedge pits will be recycled for reuse within the facility and reclaimed concrete with be disposed of offsite.</p>

3. Planning approval

City of Bayswater granted development approval on 24 August 2022 under the *Planning and Development Act 2005* for construction of a second driveway, dust monitor upgrades and replacement and construction of a truck washout facility. The only changes within this development approval that are relevant to the scope of the works approval are the changes to the truck washout facility.

Further approval was granted by the City of Bayswater on 27 February 2024 which covered alterations to the premises operating hours. As the applicant proposes to install additional noise control barriers to ensure compliance with the Noise Regulations during the expanded operating hours, the noise control infrastructure works have been assessed as part of the works approval application.

The delegated officer notes the granted development approval includes the following conditions relating to noise:

- Operating hours are to be restricted to a maximum of 12 hours between 4:00am to 6:00pm Monday to Saturday (public holidays excluded); however, no front-end loader may operate, nor may any raw materials be delivered to the site prior to 7:00am.
- The applicant must provide to the City for approval an updated version of the acoustic report 277-279 Collier Road, Bayswater-Extension of Operating Hours-Concrete Batching Plant (dated 13 December 2023), by Renzo Tonin & Associates which includes the matters referred to in the Proposed Acoustic Mitigation and Site Management Measures section of the report to Council.
- The Environment Management System (EMS) and Environmental Management Plan (EMP) must be updated to reflect the updated acoustic report approved pursuant to Condition 34, and the updated EMS and EMP must be submitted to the City for approval.
- Operating hours may not commence prior to 6.00am until;
 - the updated EMS and EMP have been approved by the City of Bayswater;
 - the signs and acoustic barriers required by the approved updated acoustic report have been installed to the requirements of the City of Bayswater; and
 - all other measures and controls with respect to noise management required by the approved updated acoustic report have been implemented to the requirements of the City of Bayswater.
- An acoustic report is to be provided within fourteen (14) days of commencement of operations prior to 6:00am, demonstrating that noise emissions from the site comply with the Environmental Protection (Noise) Regulations, 1997, to the satisfaction of the City of Bayswater.

An updated Environmental Management Plan was provided with the works approval application which includes proposed noise controls. As per the development approval controls listed above, the applicant is required to implement this plan.

4. Noise Assessment

The applicant provided an environmental noise assessment for the proposed concrete batching plant. The assessment indicated there would likely be no predicted exceedances of the assigned levels under the Environmental Protection (Noise) Regulations 1997 (Noise Regulations) at nearby sensitive receptors at any period of time.

The environmental noise assessment report prepared by Renzo Tonin & Associates (RT&A) on 16 April 2024, was reviewed in conjunction with noise assessment prepared by Herring Storer Acoustics (HSA) on 22 March 2011 and associated commissioning noise monitoring completed by HSA on the 20 February 2019. From this review the following was identified:

- RT&A proposed various noise control measures for the proposed extended operating hours including a solid barrier to the north, east and west of the mixer loading area; a five metre high solid noise barrier to the slump stand, and a 2.5 m high wall/gate on both sides to block the noise transmissions from the loading area to the closest residences to the north.
- RT&A also proposed various site management measures to reduce the noise impact for the operation period between 4:00am and 6:00am, these are covered under conditions within the development approval.
- A very low L_{A10} assigned noise level (30 dB(A)) was used for the compliance assessment. The RT&A method for calculating the assigned noise level and applying the adjustment to both cumulative and tonal displays a very conservative approach to noise assessment.
- The noise monitoring conducted by HSA in 2019 during commissioning of the batch plant indicated that for night-time operation, between 6:00am – 7:00am, emitted noise did not contribute to noise levels at the closest residences. If operations can currently comply with night-time assigned levels (as indicated by the commissioning monitoring) they are also expected to be able to comply with night-time assigned levels between 4:00am – 6:00am as the same restrictions apply.

Noise regulation during operation of the plant is primarily covered by the conditions of the City of Bayswater’s development approval and the requirements of the Noise Regulations. Based on HSA’s 2011 noise assessment report and HSA’s 2019 noise monitoring results, as well as the additional noise controls and site management measures proposed by RT&A for the extended operation hours, the delegated officer formed the view that the premises noise emissions can be effectively managed to comply with the Noise Regulations during the proposed extended operation hours.

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 2 below. Table 2 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

The applicant advised that the concrete batching plant will be constructed and operated in accordance with the Concrete Batching Regulations (refer to Table 1).

Table 2: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Construction of truck washout	Air / windborne	<ul style="list-style-type: none"> • Yard surface to be regularly washed/swept to maintain clean from erodible material.

Emission	Sources	Potential pathways	Proposed controls
	facility	pathway	<ul style="list-style-type: none"> The premises has a solid (colorbond) perimeter fence around the site at the maximum allowable height. The fencing in conjunction with surrounding buildings provide substantial windbreaks. All trafficable areas are sealed with concrete/asphalt, and all unsealed areas vegetated and reticulated in accordance with the approved landscaping plan to prevent wind erosion.
Noise		Air / windborne pathway	<ul style="list-style-type: none"> The use of engine brakes within the site is not permitted Trucks have been fitted with low frequency “croaker” reversing alarm.
Operation			
Dust	Vehicle washdown facility	Air / windborne pathway	<ul style="list-style-type: none"> Concrete/sediment collected in wedge pits/washout bins maintained in dampened condition. Wedge pits/washout bins regularly cleared, and material removed for recycling. Yard surface regularly cleaned by street sweeper and washed by plant operators. Truck are inspected prior to departing site to ensure vehicle is free of slurry and dust and are washed at the wash stand prior to leaving the premises if required.
Sediment (concrete) laden stormwater (elevated pH from cement)			<ul style="list-style-type: none"> Truck washout area is sealed and separately drained from the remainder of the site to wedge pits where water is collected for recycling. Collected solids from wedge pits/washout bins are taken offsite for recycling. Collected wash water used is recycled by the plant in subsequent batches of concrete or for washing of trucks. Thorough inspection of all loads and vehicles and washing of any material on the outside of the vehicle (if necessary) prior to leaving the site. In the event of material spill on a public road being reported, the immediate dispatch of street sweeper to clear the spill. Areas where process water is generated are separately drained to the rest of the site. Sediment traps (wedge pit) installed in front of stormwater basins to reduce sediment build-up within the basins and reduce maintenance requirements (one wedge pit proposed at north east corner).
Noise	Wet-mixing and agitator truck loading	Air / windborne pathway	<ul style="list-style-type: none"> Solid noise gates will be established on western and eastern sides of the agitator truck loading area, 2.5 metres high, constructed from Colourbond with length extending to the boundary. A noise screen will be constructed on the north, east and west sides of the loading area which extends from the ground level to the underside of the batching plant.

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> • A noise screen will be constructed fixed to the back of the slump stand which is 5 m high. • Noise screens to be constructed of 6mm thick fibre cement sheet or material of equivalent surface density. • Signs stating the mixing drum RPM must be limited to 50% before 7am will be erected at the site entry and a location visible from the loading area. • Operational controls are detailed in the Environmental Management Plan which is required to be implemented by the City of Bayswater Development Approval.

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 3 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 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Closest Residential Premises (1 Hackbridge Way, Bayswater)	140 m from the boundary of the premises
Joan Rycroft Reserve and Playground	Immediately adjacent the premises to the north
Industrial premises	Immediately adjacent to the premises to the east and west
Environmental receptors	Distance from prescribed activity
Threatened Fauna - forest red-tailed black cockatoo (Threatened – Vulnerable)	460m north from the boundary of the premises
Threatened Ecological Communities – Banksia Woodlands of the Swan Coastal Plain (Priority 3 – Endangered)	700m south from the boundary of the premises
Underlying groundwater (non-potable)	Approximately 9.50 m below ground level

5.2 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 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 4.

Works approval W6935/2024/1 that accompanies this decision report authorises construction only. The conditions in the issued works approval, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

The premises is an existing registered premises (R2475/2018/1) and is required to comply with requirements of the Concrete Batching Regulations therefore does not require further approval under Part V of the EP Act following completion of construction in accordance with the works approval. A risk assessment for the operational phase has been included in this decision report.

Table 4: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation

Risk events					Risk rating ¹	Applicant controls sufficient?	Conditions ^{2, 3} of works approval	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Construction								
Replacement and upgrade of truck washout facility	Dust	Air / windborne pathway causing impacts to health and amenity	Residences from ~ 140m to North of the premises	Refer to Section 3.1	C = minimal impacts to amenity Slight L = Will probably not occur in most circumstances Unlikely Low Risk	Y	N/A	Given the nature of the proposed works and the applicant's noise and dust controls, which are already implemented as part of active operation of the premises, the delegated officer does not expect noise and dust emissions associated with the installation of noise attenuation or replacement of truck wash facilities to impact on sensitive receptors.
	Noise							
Operation								
Cleaning of trucks at wash stands and wash out bins	Sediment (concrete) laden stormwater (elevated pH from cement)	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Main drain	Refer to Section 3.1	C = minimal offsite impacts Minor L = Will probably not occur in most circumstances Unlikely Medium Risk	Y	Condition 1	The delegated officer considered the applicant's proposed design controls for the washout bins and wash stand are critical for mitigating the risk of sediment impacting environmental receptors therefore determined to impose the works approval holder's proposed controls as infrastructure controls on the works approval to ensure the necessary infrastructure is established to ensure compliance with the Concrete Batching Regulations.
Operation of wash stands and wash out bins	Dust (from dried wastewater)	Air / windborne pathway causing impacts to health and amenity	Residences from ~ 140m to North of the premises	Refer to Section 3.1	C = minimal impacts to amenity Slight L = Will probably not occur in most circumstances Unlikely Low Risk	Y	NA	The works approval holder's controls relating to dust emissions are primarily operational controls which the applicant must implement to ensure compliance with the Concrete Batching Regulations. No additional infrastructure controls are required relating to dust emissions from the premises washing facilities.

Risk events					Risk rating ¹	Applicant controls sufficient?	Conditions ^{2,3} of works approval	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Wet-mixing and agitator truck loading for extended operational hours commencing at 4am.	Noise	Air / windborne pathway causing impacts to health and amenity	Residences from ~ 140m to North of the premises	Refer to Section 3.1	C = low level impacts to amenity Minor L = Will probably not occur in most circumstances Unlikely Medium Risk	Y	Condition 1	The delegated officer considered the applicant's proposed noise attenuation is appropriate to mitigate the risk of noise amenity impact at nearby sensitive receptors and has applied the noise attenuation measures as infrastructure controls in the works approval. The delegated officer noted the City of Bayswater development approval contains conditions relating to operational aspects of the premises and that the applicant is also required to comply with the Noise Regulations.

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 **2-6** are all department imposed conditions required for compliance reporting, and general complaint and record keeping requirements

6. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 3 June 2024	None received	N/A
Local Government Authority advised of proposal on 4 June 2024	<p>The City of Bayswater responded on 29 October and advised that the works approval is in accordance with the current development approval applicable to the site (City of Bayswater reference no. DA21-0707), therefore there is no objection to the application. The City additionally advised that:</p> <p>Washout pits will need to be maintained to ensure no unauthorised discharges as there has been issues with this in the past.</p> <p>Request the applicant to provide the City and DWER with annual production quantities each year.</p> <p>The main drain directly behind the premises connects to the Swan River so should be considered a sensitive receptor.</p> <p>Following a recent site inspection it is considered that a sediment trap should be installed at the rear right hand of the premises to prevent discharge into the stormwater basins.</p>	<p>The delegated officer noted the comments and advises.</p> <p>The works approval holder will be required to comply with the Concrete Batching Regulations which have requirements relating to the control of wastewater and maintenance of slurry pits/settlement ponds.</p> <p>As registered premises do not have conditions or reporting requirements the department is unable to require the applicant to report production quantities on an annual basis.</p> <p>The works approval includes a requirement to install a sediment trap adjacent to the stormwater basin at the north of the premises as per the plan and Environmental Management Plan provided with the application.</p>
Applicant was provided with draft documents on 18 November 2024	<p>Clarification was sought by the department on final sizing and construction material of the wash out bins and wedge pit. Additionally, clarification was required on which items of noise mitigation were gates or walls.</p> <p>The applicant responded on the 20 January 2025 and provided all necessary information.</p>	<p>The delegated officer noted the applicant's response and incorporated the final design into the works approval construction requirements.</p>

7. Decision

The delegated officer has determined the proposal to replace and upgrade of truck washout infrastructure on does not pose an unacceptable risk of impacts to public health or the environment, subject to regulatory controls. This determination is based on the following:

- the proposed works will be conducted entirely within an existing operational industrial premises;
- the proposed construction works are limited in scope and duration;
- the applicant has demonstrated that, subject to implementation, the proposed works will enable the premises to comply with the Concrete Batching Regulations and the Noise Regulations;
- the applicant's proposed infrastructure controls have been applied as regulatory controls within the works approval.

Based on this assessment the works approval has been granted for a period of 24 months from date of issue, subject to conditions commensurate with the applicant's proposed controls relating to noise and potentially contaminated water, and conditions necessary for compliance, administration, and reporting requirements. The conditions of the works approval require the applicant to demonstrate compliance with the specified design and construction requirements, when construction works are complete, through submission of a compliance audit report.

The applicant will be required to operate the premises in a manner which complies with the Concrete Batching Regulations, Noise Regulations, and the Environmental Protection (Unauthorised Discharges) Regulations 2004.

8. Conclusion

Based on this assessment, the delegated officer has determined to grant a works approval, 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. DER, 1998, Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, Guideline: Environmental Siting, Perth, Western Australia.
4. DWER 2020, Guideline: Risk Assessments, Perth, Western Australia.
5. Ransberg Pty Ltd, 2024, Application for a works approval and supporting documents, Perth, Western Australia
6. Renzo Tonin & Associates, 2023, 277-279 Collier Road, Bayswater – Extension of Operating Hours – Concrete Batching Plant, Perth, Western Australia
7. Herring Storer Acoustics, 2019, Acoustic Assessment: Bayswater Batch Plant Commissioning Noise Monitoring, Perth, Western Australia
8. Herring Storer Acoustics, 2011, Noise Assessment: Proposed Concrete Batch Plant – 277-279 Collie Road, Bayswater, Perth, Western Australia