



Application for Licence Amendment

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

Licence Number	L9004/2016/1
Licence Holder	Asphaltech Pty. Ltd.
ACN	064 520 869
File Number	DER2016/002036-1 and INS-0001973
Premises	Asphaltech Road Pavement Recycling Operation 69 Mather Drive, Neerabup, WA, 6031 Legal description – Lot 2004 on Deposited Plan 70103 Certificate of Title Volume 2765 Folio 588 As depicted on the Premises map in Schedule 1
Date of Report	12 November 2025
Decision	Revised licence granted

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1. Decision summary

Licence L9004/2016/1 is held by Asphaltech Pty Ltd (Licence Holder) for the Asphaltech Road Pavement Recycling Operation (the Premises), located at 69 Mather Drive Neerabup.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L9004/2016/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department 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

On 22 May 2025, the applicant submitted an application for a licence amendment to the department under section 57 of the *Environmental Protection Act 1986* (EP Act). The application is to seek a licence amendment relating to the establishment and operation of a mobile asphalt plant at the premises located approximately 0.85 km north from the suburb of Carramar.

The premise is currently licenced to operate as a category 61A (solid waste facility), with assessed production capacities under Schedule 1 of the Environmental Protection Regulations 1987 (EP Regulations) defined in licence L9004/2016/1.

The amendment will be performed without a prior works approval in accordance with published department guidelines relating to Asphalt manufacturing due to the limited construction works required to establish the mobile asphalt plant and the premise already being licenced under the EP Act (DWER 2018).

The amendment scope is for the addition of a mobile asphalt plant under Category 35, no changes relating to the existing Category 61A approval will be considered. The outlined changes to design and throughput capacity of premise are outlined below within Table 1.

Table 1: Proposed design capacity changes

Category	Current design capacity	Proposed design and throughput capacity	Description of proposed amendment
35	N/A	Design capacity: 1,135,680 tonnes per annum (using 130t/hr maximum capacity with continuous operation) Estimated throughput: 35,000 tonnes per annum	The licence holder plans to establish a mobile asphalt plant on the premise to begin asphalt production.

2.3 Overview of premises

The premise currently operates as a Category 61A solid waste facility comprising of the

infrastructure outlined within Table 2.

Table 2: Asphaltech Neerabup Category 61A infrastructure

Infrastructure	
Prescribed Activity Category 61A	
The Premises accepts solid waste (Reclaimed Asphalt Pavement (RAP) and other recycled and blended granulated materials) and mixes these with bitumen emulsion in a mobile wet mixer to produce Emulsion Stabilised Bitumen (ESB). The ESB is used at locations other than the Premises.	
1	Internal access roads made from asphalt
2	Concrete hardstand for future bitumen emulsion plant and transportable office
3	Mobile wet mixer
4	Reclaimed materials stockpile area with hardstand made from ESB
5	Landscaped area of for infiltration of stormwater falling on the site
6	380 m ² earth-lined compensating basin at least 1.3 m deep
7	Mobile crusher and screener moved onto the site on an as needs basis.
8	Mobile bitumen emulsion tanker brought onto the site on an as needs basis
9	Not more than two front end loaders operating on site.

Emission risks relating to dust, noise and contaminated stormwater from the operation of the Category 61A facility are currently managed under conditions within Licence L9004/2016/1. These emissions risks relating to activities already occurring at the premise are considered outside of the scope of this assessment.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 3 below. Table 3 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 3: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Waste gases	Mobile Asphalt plant	Air/windborne pathway	The mobile asphalt plant integrates primary and second dust management. The primary dust collecting unit comprises a cyclone dust extractor and screw conveyer which collects and then reintegrate larger particulate matter. The secondary dust management is a baghouse filter which all output gases flow through prior to atmospheric release through a stack. The baghouse possesses the following specifications: (i) Type: Reverse Air Flow type (ii) Bags: 288 (330 mm x 2000 mm) (iii) Filter area: 380 m² (approx.) (iv) Material: "Meta Aramid" felt 550 gms/m² (v) Normal temperature limit: 180°C (vi) Dust emission: 0.2 mg/m³
Noise	Crushing and screening of material	Air/windborne pathway	No controls proposed.
Odour	Use of bitumen within production process	Air/windborne pathway	No controls proposed.
Sediment laden stormwater	Storage of RAP and other input materials	Overland runoff	No controls proposed.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder'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 4 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 4: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential premises	850m south southeast from nearest edge of premise boundary
Industrial premises	25m from nearest edge of premise boundary

Environmental receptors	Distance from prescribed activity
Bush Forever Area #295, Flynn Drive Bushland, Neerabup	365m southeast from nearest edge of premise boundary
Critically Endangered Threatened Ecological Community (TEC)	400m east from nearest edge of premise boundary

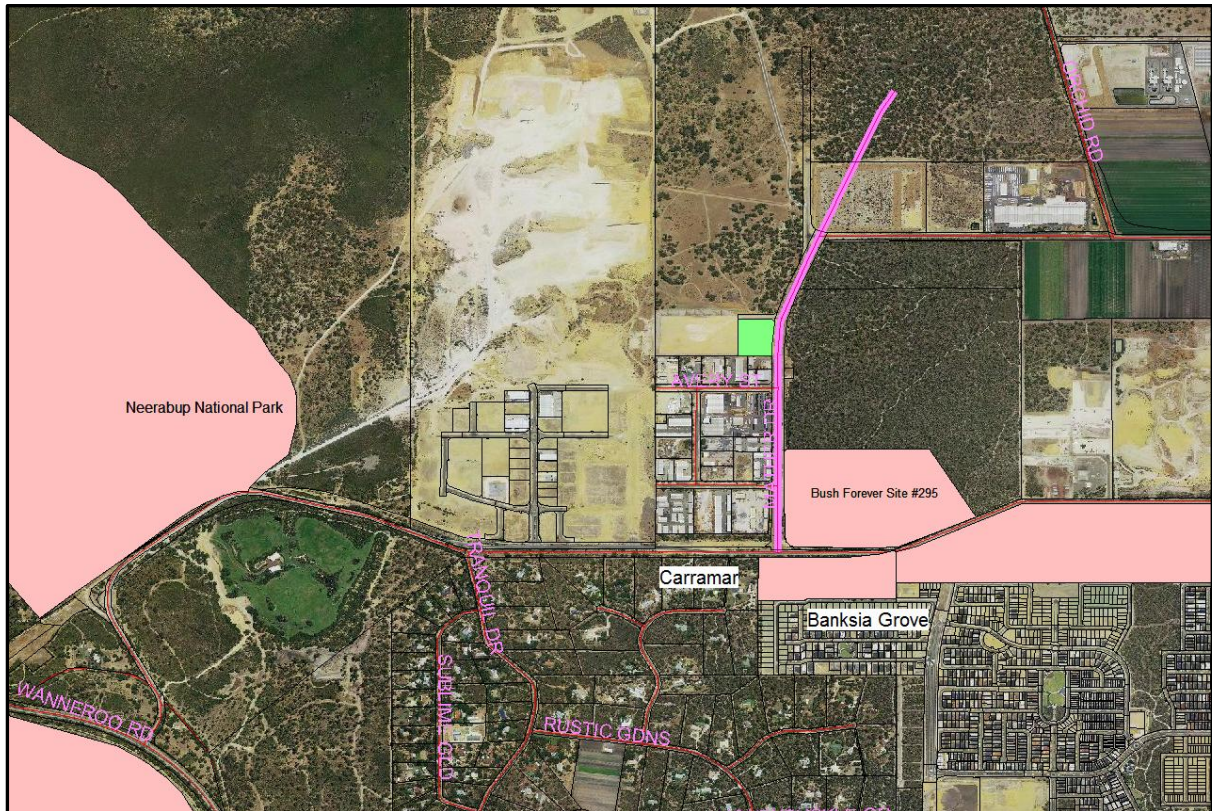


Figure 1: Map of receptors surrounding premise

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change 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 Licence Holder 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 Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 5.

The Revised Licence L9004/2016/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Asphalt production.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 5. Risk assessment of potential emissions and discharges from the premises operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Operation of mobile asphalt plant	Waste gases (fumes and particulates)	Air/windborne pathway causing impacts to health and amenity	Residential premise 850m southeast Critically endangered TEC 400m east	Refer to Section 3.1.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1, 2, 4, 5, 12, 13 & 14.	The delegated officer has determined to integrate emission monitoring and limits in tandem with applicant proposed controls. These controls have been informed by emissions testing performed by the applicant for an equivalent facility in Malaga alongside similar approvals issued by the department. The controls ensure that applicant baghouse and filters are operating to expected standards. Given exhaust gas emissions remain within the limits established by licence condition 4 no significant risk to public or environmental health is posed.
	Noise	Air/windborne pathway causing impacts to health and amenity	Residential premise 850m southeast	Refer to Section 3.1.1	C = Insignificant L = Unlikely Low Risk	Y	Condition 1 & 2.	The delegated officer considers existing conditions alongside separation distance to nearest receptor as sufficient to manage risks posed.
Transport and use of Bitumen within mobile asphalt plant	Odour	Air/windborne pathway causing impacts to health and amenity	Residential premise 850m southeast	Refer to Section 3.1.1	C = Insignificant L = Unlikely Low Risk	Y	Condition 1 & 2.	The delegated officer considers existing conditions alongside separation distance to nearest receptor as sufficient to manage potential risk.
Storage of input materials	Sediment laden stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Critically endangered TEC 400m east	Refer to Section 3.1.1	C = Minor L = Unlikely Medium Risk	Y	Condition 2 & 11.	The delegated officer considers the existing licence conditions relating to hardstands and stormwater management to be sufficient to manage risks incurred.

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

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

4. Consultation

Table 6 provides a summary of the consultation undertaken by the department.

Table 6: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of proposal 8 October 2025.	On 29 October the City notified the department that the proposal is consistent with existing use and approval of the site.	N/A
Licence holder provided with draft amended licence and amendment report on 21 October 2025.	On 28 October 2025 the applicant waived the comment period	N/A

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 7 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 7: Summary of licence amendments

Condition no.	Proposed amendments
Cover Page	Prescribed premise category description updated to include new licence category 35 Asphalt manufacturing.
	Date of last amendment updated.
Explanatory notes	Section removed in accordance with current licensing format.
Definitions	Section moved in accordance with current licensing format.
Licence History	Section inserted in accordance with current licensing format.
Interpretation	Section revised to current licensing format.
Condition 2	Updated to include reference to mobile asphalt plant and related operation details.
Condition 4,5,6,7 & 8	Additional conditions added to managed air emissions related to mobile asphalt plant.
Condition 19	Updated layout to match current department norms alongside adding reporting requirements for new conditions.

Condition 20, 21 & 22	Removal of redundant conditions relating to the production of a noise assessment for the initial establishment of the licence.
Schedule 2	Updated to include reference to Category 35 and mobile asphalt plant.

References

1. Asphaltech, 2025a, *Amendment application – Application form*, Perth, Western Australia
2. Asphaltech, 2025b, *Licence application – Additional information submitted*, Perth, Western Australia
3. Asphaltech, 2025c, *Licence application – Malaga Emission Testing Report*, Perth, Western Australia
4. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
5. Department of Water and Environmental Regulation (DWER) 2018, *Industry Regulation fact sheet: Asphalt manufacturing*, Perth, Western Australia
6. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
7. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.