

Application for Licence

Part V Division 3 of the Environmental Protection Act 1986

Licence Number	L9394/2023/1					
Applicant	Sims Group Australia Holdings Ltd					
ACN	37 008 634 526					
File number	DER2023/000362					
Premises	Sims Metal					
	Karratha Industrial Estate					
	Karratha 6714					
	Legal description -					
	Lot 4640 on Deposited Plan 194777					
	Certificate of Title Volume 2182 Folio 385					
Date of report	20 June 2024					
Decision	Licence granted					

Abbie Crawford MANAGER, WASTE INDUSTRIES an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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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 operation of the premises. As a result of this assessment, licence L9394/2023/1 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 26 May 2023, the applicant (Sims Group Australia Holdings Ltd) submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application is to seek a licence relating to scrap metal recycling at the premises. The premises is located approximately 4 km south of town of Karratha.

Sims Metal has been operating a scrap metal recycling facility at Lot 4640 Coolawanyah Road, Karratha since 1988. The applicant's intention is to remain at the current location for next three years. Processing operations at the premises include:

- Size reduction, predominantly using hydraulic shears mounted on excavator booms with limited use of flame cutting;
- Sorting to separate unsuitable materials, waste materials, ferrous and non-ferrous metals;
- Compacting of sheet metals and pre-processed motor vehicles;
- Stockpiling of correctly sized ferrous and non-ferrous metals; and
- End of life vehicles processing, including the removal of tyres, oils, fuels and coolants prior to being crushed and compacted.

With this licence application, the applicant is proposing to undertake construction works associated with the following:

- Installation of End-of-Life Facility (ELF);
- Installation of wash bay and diesel tank; and
- Construction of stormwater infrastructure.

The premises relates to the category and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L9394/2023/1. 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 licence L9394/2023/1.

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.

Emission	Sources	Potential pathways	Proposed controls					
Construction								
Dust	Install of end-of-life facility Construction of stormwater infrastructure Vehicle movements and machinery operations	Air / windborne pathway	 Visual inspections of work areas will be undertaken daily, and any adverse dust observations are to be recorded in weekly inspection as part of normal operation Where excessive dust emissions are observed, the incident will be entered with the Sims incident management database and investigated accordingly. The treated water from wash bay is used for dust suppression through the water cart. 					
Noise		Air / windborne pathway	Noise will be managed according with the Environmental Protection (Noise) Regulations 1997.					
Hydrocarbons	Spills / leaks of hydrocarbons storage and refueling infrastructure	Overland runoff Seepage in to underlying soils and infiltration into groundwater	 Emergency response procedures for the facility will be updated to include response procedures to be implemented in the event of a chemical, fuel or oil spill. Oil, fuel and chemicals will be stored in bunded areas whilst on site and during transfers from bulk stores. Suitable spill clean-up and containment kits are available on site. 					
Operation								

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Noise	Operation of mobile shear, rail breaker and mobile baler Traffic movements and deliveries Sorting and load preparation	Air / windborne pathway	Noise will be managed according with the Environmental Protection (Noise) Regulations 1997.
Dust	Operation of mobile shear, rail breaker and mobile baler Traffic movements Sorting and load preparation	Air / windborne pathway	 Visual inspections of work areas will be undertaken daily, and any adverse dust observations are to be recorded in weekly inspections as part of normal operation Where excessive dust emissions are observed, the incident will be entered with the Sims incident management database and investigated accordingly. All work areas and driveways are to be sealed or be treated with surface stabilizers such as Dustex. Areas of the site that are not being actively utilised will be delineated with traffic controls to limit pedestrian and vehicular movement. These surface areas will also be treated with surface stabilising agents such Dustex in accordance with manufacturer's recommendations. Sealed pavement work areas will be swept on a daily basis and the treated water from wash bay is used for dust suppression through the water cart.
Spills of chemicals and hydrocarbon and spills of dangerous or hazardous waste	Operation of mobile shear, rail breaker and mobile baler Residual liquid residues from waste received at the premises	Overland runoff Seepage in to underlying soils and infiltration into groundwater	 Emergency response procedures for the facility will be updated to include response procedures to be implemented in the event that chemical, fuel or oil spill results. Oil, fuel and chemicals will be stored in bunded areas whilst on site and during transfers from bulk stores. Suitable spill clean-up and containment kits are available on site
Smoke/Fire	Oxy cutting operation	Air / windborne pathway	 Burning will not be used to recover metals that are coated in paint, varnish or plastic insulation. Flame cutting of scrap metal will only be used where rubber or other synthetic surface and sub-surface coatings have been removed so as to prevent the generation of airborne pollutants (e.g. smoke or acrid odours).

Emission	Sources	Potential pathways	Proposed controls				
			• The site will be fenced with a 3.6m high solid perimeter fence to aid in minimising dust and smoke emissions beyond the site boundaries.				
			 Oxy cutting activities shall be conducted in accordance with the oxy cutting procedure. Including being in a well- ventilated, designated hot works area to assist in dispersion of smoke from oxy torch processing. 				
			 Dust suppression equipment shall be utilized during metal processing activities, to minimise the discharge of dust and particulate matter (e.g. PM₁₀ and PM_{2.5} particulates) as a result of high-pressure torch cutting. 				
			• Weather conditions will be assessed prior to commencing oxy cutting to ensure that dispersive wind conditions are present to encourage dispersion of smoke. The Netatmo weather monitoring system will be used to assess current and forecast weather conditions, in particular, wind speed, direction, temperature and humidity.				
			 Visual inspections of work areas will be undertaken daily, any adverse conditions or un-controlled emissions are to be recorded. If excessive emissions are observed, oxy cutting will cease, and operating procedures will be reviewed. 				
			• Whenever excessive / uncontrolled smoke emissions are identified the incident shall be entered with the Sims incident management database and investigated to determine the contributing factors and allow procedures to be reviewed to prevent a recurrence				
Odour	Oxy cutting operation	Air / windborne pathway	• Metals coated with or containing materials that emit toxic fumes will not be heated or cut unless coating is removed from the work surface.				
Contaminated stormwater	Onsite stockpiling of scrap metal	Infiltration of overland runoff and drainage into groundwater	 Implementation of the stormwater management plan strategies: The surface water from the low risk storage areas will either infiltrate into the unsealed ground or drain to the Council open channel via overland flows Major general scrap metal stockpile 				

Emission	Sources	Potential pathways	Proposed controls					
			areas are to remain unsealed to allow stormwater to infiltrate into the soil to the greatest extent possible					
			 Light vegetation and scour protection is to be established along the front fence to manage erosion and minimise sediment transfer 					
			 An EN 858-1 Class 1 full retention water treatment system will be installed to treat contaminated stormwater within the medium-risk area. 					

3.1.3 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.

Tabel 2 and Figure 1 below provide 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 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Temporary accommodation	Approximately 700 m west of the Premises boundary
Residential Premises	Approximately 3.5 km north of the premises boundary
Industrial Premises	Premises located within the Karratha industrial estate.
Environmental receptors	Distance from prescribed activity
Priority Ecological Communities	Roebourne Plains gilgai grasslands – priority 1 – approximately 1.4 km south of the premises boundary
	Horseflat Land System of the Roebourne Plains – Priority 3- approximately 2 km south-west of the premises
Department of Biodiversity Conservation and Attraction legislated tenure	Pin no – 705634-Approximately 800m north of the premises
	Pin no - 705332 - Approximately 1 km south-west of the premises
Pilbara Surface Water Area - proclaimed under the <i>Rights in Water and Irrigation Act 1914</i>	Premises is within the designated area
Pilbara Groundwater Area - proclaimed under the Rights in Water and Irrigation Act 1914	Premises is within the designated area
Gwen Creek	Approximately 250 m south-west of the premises boundary.
Minor surface water lines	Approximately 75 m and 210 m south-west of the premises boundary.
Groundwater	Approximately 5-10 m below ground level



Figure 1: Distance to sensitive receptors

3.2 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 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 licence 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.

Licence L9394/2023/1 that accompanies this decision report authorises emissions associated with the operation of the premises.

The conditions in the issued licence, 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 ¹					
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls	
Construction									
Install of end-of-life facility and construction of stormwater infrastructure Vehicle movements and machinery operations	Dust	Air / windborne pathway causing	Temporary accommodation 700m west Residences 3.5 km north Adjacent industrial offices and workplaces	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 12 and 22	The Delegated Officer considers that the Applicant's proposed infrastructure and management controls are likely to be sufficient at mitigating dust emissions during construction	
	Noise	amenity		Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 22	The Delegated Officer considers noise emissions associated with the construction can be sufficiently managed through the <i>Environmental</i> <i>Protection (Noise)</i> <i>Regulations 1997</i>	
Spills / leaks of hydrocarbons storage and refueling infrastructure	Hydrocarbons	Seepage into underlying soils causing localised contamination Overland flow to stormwater infrastructure and infiltration to groundwater causing ecosystem	Minor surface water lines approximately 75 m and 210 m south-west. Groundwater approx. 5 – 10 m Below Ground Level	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 10, 11 and 22	The Delegated Officer considers that the Applicant's proposed infrastructure and management controls are likely to be sufficient at mitigating emissions from spills of	

Risk events				Risk rating ¹				
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
		disturbance or impacting groundwater quality						hydrocarbon during construction
Operation								
	Dust	Air / windborne pathway causing impacts to health and amenity	Temporary accommodation 700m west Residences 3.5 km north Adjacent industrial offices and workplaces	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 4, 5, 12 and 22	The Delegated Officer considers that the Applicant's proposed infrastructure and management controls are likely to be sufficient at mitigating dust emissions
Acceptance, sorting, storing and load preparation Operation of mobile shear, rail breaker, mobile baler and end of life facility Traffic movements and deliveries	Noise	Air / windborne pathway causing impacts to health and amenity	Temporary accommodation 700m west Residences 3.5 km north Adjacent industrial offices and workplaces	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 4, 5 and 22	The Delegated Officer considers noise emissions associated with the operation can be sufficiently managed through the <i>Environmental</i> <i>Protection (Noise)</i> <i>Regulations 1997</i>
	Spills of chemicals, hydrocarbon and dangerous or hazardous waste	Seepage into underlying soils causing localised contamination Overland flow to stormwater infrastructure and infiltration to groundwater causing	Adjacent industrial offices and workplaces Minor surface water lines approximately 75 m and 210 m south-west.	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	Condition 1, 4, 5, 8, 9, 10, 11,14, 21 and 22	Taking into account the licence holder's proposed infrastructure and management controls, Conditions 14, 20 and 21 are added to the licence. Those conditions are

Risk events				Risk rating ¹				
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
		ecosystem disturbance or impacting groundwater quality	Groundwater approx. 5 – 10 m Below Ground Level					to minimise the risk of spills and contaminated stormwater.
	Contaminated stormwater	Seepage into underlying soils causing localised contamination Overland flow to stormwater infrastructure and infiltration to groundwater causing ecosystem disturbance or impacting groundwater quality	Temporary accommodation 700m west Residences 3.5 km north Adjacent industrial offices and workplaces Minor surface water lines approximately 75 m and 210 m south-west Groundwater approx. 5 – 10 m Below Ground Level	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1, 4, 5, 7, 8, 9, 10, 11, 13, 14, 21 and 22	Conditions 14, 20 and 21 have been added to the licence to minimise the risk of spills and contaminated stormwater from the storage of scrap metals on the premises
Oxy cutting operation	Smoke/fire	Air / windborne pathway causing impacts to health and amenity	Temporary accommodation 700m west Residences 3.5 km north Adjacent industrial offices and workplaces.	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 4, 5, 6, 8 9, 15, 16, 17 and 22	The Delegated Officer has reviewed the information regarding the impact of air emissions generated during a fire and has noted that; a fire prevention and management plan can help reduce the risks of impacts

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IR-T13 Decision report template (short) v3.0 (May 2021)

Risk events					Risk rating ¹			
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
			DBCA managed land 800 m north					to fire and can be regulated through conditions in the license. The licence holder will be required to implement a Fire and Emergency Management plan that is consistent with AS3745
	Fire debris and washwater	Seepage into underlying soils causing localised contamination Overland flow to stormwater infrastructure and infiltration to groundwater causing ecosystem disturbance or impacting groundwater quality	Minor surface water lines approximately 75 m and 210 m south-west. Groundwater approx. 5 – 10 m Below Ground Level	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Ζ	Condition 1, 4, 5, 7, 8, 9, 10, 11, 13, 14, 21 and 22	The Delegated Officer has notes that no controls have been proposed to prevent firefighting wash water from contaminating the soil and groundwater or how the firefighting water will be contained and safely disposed. Conditions have been added to the licence to require the implementation of a Fire and Emergency Management Plan to prevent discharges of contaminated firewater into stormwater systems, documentation for which is to be lodged

Licence: L9394/2023/1

IR-T13 Decision report template (short) v3.0 (May 2021)

Risk events	Risk rating ¹							
Sources / activities	Potential emission	Potential pathways and impact	Receptors	C = consequence controls L = likelihood		Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
								with the Licence application for assessment of effectiveness of the controls.
	Odour	Air/windborne pathway causing impacts to health and amenity.	Temporary accommodation 700m west Residences 3.5 km north Adjacent industrial offices and workplaces.	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 5, and 22	The Delegated Officer considers that the Applicant's proposed infrastructure and management controls are likely to be sufficient at mitigating odour emissions

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.

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 28/07/2023	None received	N/A		
Local Government Authority advised of proposal on 28/11/2023	The City of Karratha responded to the request for comment on 28 November 2023. The City forwarded the Development Approval for the premises as granted on 22 November 2023.	DWER assesses applications in-line with statutory processes noting that land use planning is a separate statutory process. It is important to note that an instrument granted by the Department only provides a defence for the occupier for offences under Part V, Division 3 of the EP Act, provided the conditions contained within the licence have been complied with, and not for any offences under planning legislation.		
Applicant was provided with draft documents on 22/05/2024	Refer to Appendix 1	Refer to Appendix 1		

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence will be granted, 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. 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: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
Condition 1, Table 1	The applicant requested that the reference to the size of the end- of-life vehicle facility to be removed.	The delegated officer agreed with the request and updated the condition 1, Table 1 and site plan.
	The applicant requested that the requirements to establish a bund and drain around all boundaries be removed.	The delegated officer agreed with the request and updated the condition 1, Table 1.
Condition 5, Table 2	The applicant requested that the concrete hardstand be replaced with compacted soil and that the tank design and construction be updated to comply with the AS 1692 standard.	The delegated officer agreed with the request and updated the condition 1, Table 1 and condition 5, Table 2.
	The applicant requested that the requirement to have foam stations at each hydrant to be removed	The delegated officer agreed with the request and updated the condition 5, Table 2.
Schedule 1 Figure 2	The applicant requested that the discharge point testing of the stormwater be modified to a location where the water arrives from the light gauge area after the treatment system.	The delegated officer agreed and requested an updated site plan.

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY							
Application type							
Works approval							
		Relevant works approval number:		Non e			
		Has the works approva with?	Yes 🗆 No 🗆				
Licence	\boxtimes	Has time limited operations under the works approval demonstrated acceptable operations?] No 🗆		
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?] No 🗆		
		Date Report received:					
Renewal		Current licence number:					
Amendment to works approval		Current works approval number:					
Amondment to licence		Current licence number:					
Amendment to licence		Relevant works approval number:		N/A			
Registration		Current works approval number:		Non e			
Date application received	26/05/	/2023					
Applicant and Premises d							
Applicant name/s (full Sim legal name/s)		Sims Group Australia Holdings Ltd					
Premises name	Sims	Metal					
Premises location	Lot 4640 on deposited plan 194777 Volume 2182 Folio 385						
Local Government Authority	City of Karratha						
Application documents							
HPCM file reference number:	DER2018/001042-9~35						
Key application documents (additional to application form):	Attachment 1A Certificate of Title 2182-385 Lot 4640 On deposited plan 194777 Attachment 1C Authorisation to act as representative of the occupier Attachment 2 Site plan Attachment 3A ELV						

Scope of application/asso	Attach Attach Attach Attach Karrath Attach Attach Attach May 23	ment ment ment ha ment ment 3 Fin	3A Wasdown bay (1) 3A Wasdown bay (2) 6A WA-SWMS-044KA O 8A WA014 Environmenta 8B WA055 Pilbara Cyclo 8C WA071 HSE Manage 8D Karratha SIMS Storm al	exy al N ene eme	Cutting (Karratha) Management Plan – Management Procedure ent Plan ater Management Plan		
Scope of application/asse					af a successful as successing a		
Summary of proposed	New licence application for operation of scrap metal recycling						
activities or changes to existing operations.	Construction of end-of-life facility (20 feet container) and wash down bay as required for the operations.						
Category number/s (activi	ties tha	t cau	use the premises to beco	om	e prescribed premises)		
Table 1: Prescribed premi	ses cati	eaor	ies				
Proposition promises enterery production or design Proposed changes to the							
and description cap			acity		production or design capacity (amendments c		
Category 47: Scrap metal 80, recovery: premises (other than premises within category 45) on which metal scrap is fragmented or melted, including premises on which lead acid batteries are reprocessed.		80,0	000 tonnes per annual.		N/A		
Legislative context and ot	her app	orova	lls				
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 □ No ⊠	N	/A			
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?		Yes □ No ⊠	N/A				
Has the proposal been refe and/or assessed under the Act?	proposal been referred sessed under the EPBC		Yes □ No ⊠	R	eference No: N/A		
Has the applicant demonstrated occupancy (proof of occupier status)?		Yes ⊠ No □	С	ertificate of title ⊠			

Has the applicant obtained all relevant planning approvals?	Yes ⊠ No □ N/A □	Approval: Development approval from city of Karratha (didn't provided along with the application). Expiry date:
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes 🗆 No 🖂	CPS No: N/A
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes 🗆 No 🛛	Application reference No: N/A Licence/permit No: N/A
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes □ No ⊠	Application reference No: N/A Licence/permit No: N/A
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes ⊠ No □	Name:RIWI surface water Areas andirrigation districtsRIWI Act – Groundwater AreasType:Pilbara Surface water areaPilbara Groundwater AreaHas Regulatory Services (Water)been consulted?Yes □ No ⊠ N/A □Regional office: N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes □ No ⊠	Name: N/A Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)? Yes \Box No \Box N/A \boxtimes
Is the Premises subject to any other Acts or subsidiary regulations (e.g. Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx)	Yes □ No ⊠	N/A
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes □ No ⊠	N/A

Is the Premises subject to any EPP requirements?	Yes □ No ⊠	N/A	
Is the Premises a known or suspected contaminated site under the Contaminated Sites Act 2003?	Yes □ No ⊠	Classification: N/A / Date of classification: N/A	