



## Application for Works Approval

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

---

**Works Approval Number** W3060/2025/1

**Applicant** Hope Valley Wood Waste Pty Ltd

**ACN** 627 823 876

**File number** APP-0027314

**Premises** Hope Valley Crushing  
766 King Road  
OLBURY WA 6121  
  
Legal description  
Lot 102 on Deposited Plan 82617  
Certificate of Title Volume 1931 Folio 434  
As defined by the premises maps attached to the issued works approval

**Date of report** 21/05/2026

**Decision** Works approval granted

## Table of Contents

<b>1.</b>	<b>Decision summary</b>	<b>1</b>
<b>2.</b>	<b>Scope of assessment</b>	<b>1</b>
2.1	Regulatory framework	1
2.2	Application summary and overview of premises	1
2.3	Asbestos Management Plan	2
2.4	Department of Health advice	3
2.5	Other Stakeholder advice	5
2.5.1	Local Government Authority	5
2.5.2	Department of Local Government, Industry Regulation and Safety	6
2.5.3	King Road Brewery Company	7
2.6	Contaminated Sites advice	7
<b>3.</b>	<b>Risk assessment</b>	<b>11</b>
3.1	Source-pathways and receptors	11
3.1.1	Emissions and controls	11
3.1.2	Receptors	13
3.2	Meteorology	14
3.2.1	3.2.1 Wind direction and strength	14
3.3	Risk ratings	16
3.4	Detailed risk assessment for Asbestos fibres	19
3.4.1	Identification and general characterisation of emission	19
3.4.2	Description of potential adverse impact from the emission	19
3.4.3	Criteria for assessment	19
3.4.4	Applicant controls	19
3.4.5	Consequence	20
3.4.6	Consequence	20
3.4.7	Overall Risk Rating	20
3.4.8	Key findings	21
<b>4.</b>	<b>Consultation</b>	<b>21</b>
<b>5.</b>	<b>Conclusion</b>	<b>22</b>
	<b>References</b>	<b>22</b>

## 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 of the premises. As a result of this assessment, works approval W3060/2025/1 (W3060) 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 24 January 2025, Hope Valley Wood Waste 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 remediation of existing construction and demolition waste (C&D waste) at 766 King Road, Oldbury (the premises) through crushing and screening to make fill material. The fill is intended to be used as a hardstand to raise low lying land to the west of the existing transport depot, making the depot larger. The previous landowner had stockpiled approximately 25,000 m<sup>3</sup> of various C&D waste on the property without appropriate regulatory approval.

The crushing and screening activity will be for a short period of time, being approximately 12 to 16 weeks. Activities will be facilitated by bringing a mobile crushing and screening plant to the premises and removing the plant once crushing and screening activities are completed.

Other mobile equipment includes:

- Excavator to recover and sort C&D materials
- Excavator with concrete pulveriser / rock-breaker
- Reclaimer to size separate materials
- Jaw crusher to reduce size of bricks and concrete to <150mm
- Mobile stacker to stack crushed brick and concrete
- Front-end loader / bulldozer for loading trucks and moving materials
- Standby diesel electric power generation (~30KVA)
- Rollers for compacting materials

The application seeks authorisation to crush and screen asbestos contaminated material (ACM) present in C&D waste on site in open air.

Given the variable types of C&D waste at the premises, remediation works are based on recovering resources from the stockpile of C&D waste and using this resource on or off-site as described in Table 1 below.

**Table 1 Resources Recovery**

Material	Recovered resource	Planned usage
C&D Stockpile	Steel	Sold as scrap metal
	Timber	Ground to make mulch

Material	Recovered resource	Planned usage
	Sand	To be used as fill either onsite or off-site
	Concrete and bricks	Crushed and screened and then to be used as fill either onsite or off site

The premises is approximately 2.4 km southeast of Wellard residential area. Figure 1 provides the premises map while Figure 2 provides the C&D Waste stockpile location at the premises.

The premises relates to the category / categories and assessed production / design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W3060. 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 W3060.

Noting the proposed duration of the crushing and screening program the Applicant is requesting a Works Approval and Time-limited operations for 150 days to allow operation of the crusher and screen. No Licence will be required post crushing and screening of the C&D waste stockpile.

### 2.3 Asbestos Management Plan

The applicant has submitted several revisions of an Asbestos Management Plan (AMP) to support the crushing and screening of the C&D stockpile through the assessment of the application.

The initial application submission was supported by an AMP, prepared by Aurora Environmental and Coterra Environmental, and submitted on 21 July 2025 behalf of the applicant. On 24 July 2025, DWER completed its review of the AMP and determined that proposed asbestos management was unsuitable, as adequate characterization of the C&D waste stockpile had not been demonstrated. DWER requested the applicant provide a revised AMP outlining how sufficient stockpile characterization would be undertaken, and addressing data gaps identified in Revision 1 of the AMP. AMP Revision 2 was subsequently submitted on the 4 August 2025, including a Stockpile Asbestos Assessment (Asbestos Assessment) for asbestos for the C&D Stockpile.

DWER reviewed the Revision 2 AMP and Asbestos Assessment and requested further information in correspondence dated 13 August 2025. The request for further information acted to identify data gaps still remaining in the applicants' crushing and screening proposal, and address DWER's concerns relating to the proposed operations; including;

- How the AMP would align with the AMP requirements specified in Section 3.1 of the *Guideline: Managing asbestos at construction and demolition waste recycling facilities* (Guideline, including the provision of a sampling and analysis program (SAP).
- How sampling requirements will be revised to ensure the stockpiles are adequately characterized prior to crushing and screening occurring, noting that DWER does not accept the proposed approach of relying on visual inspection prior to crushing and screening, with analytical sampling only undertaken afterward, as it is insufficient to confirm the absence of asbestos and does not adequately mitigate the risk of airborne asbestos fibre release during processing.
- How adequate characterization of the stockpile would be undertaken, as this had not been addressed to date.

The Department received correspondence from the applicant on 14 August 2025 advising they would provide the department with a summary of specialist advice within two weeks regarding the matters outlined by the Department on 13 August 2025.

DWER referred the AMP Revision 2 to the Department of Health (DOH) for technical advice on 21 August 2025, who responded on 2 September 2025 advising they were unresponsive of the application. DOH also included a list of recommendations for incorporating into a revised AMP, which would assist in addressing risks raised by both DOH and DWER in relation to the crushing and screening of ACM. An overview of DOH's technical advice in relation to the application is included in Section 2.4 below.

DWER sent additional correspondence to the applicant on 8 September 2025, providing DOH's advice in relation to the provision of a revised AMO and requesting an update on submission timeframes for outstanding information required to inform the assessment of the application. No response was received and the subsequently remained on hold (stop the clock) pending the provision of the requested information.

A new AMP was provided to DWER on 27 January 2026 by ABEC Environmental Consulting on behalf of the applicant. DWER forwarded the AMP to DOH on 30 January 2026. DOH responded on 12 February 2026 requesting additional amendments to the AMP, which are outlined in Section 2.4 below.

In with DOH's recommendation, a revised AMP was submitted to DWER on 22 February 2026 for review. Revision 2 of the AMP was re-referred to DOH by DWER on 23 February 2026. DOH responded requesting additional amendments be incorporated, which DWER again forwarded to the applicant for consideration.

The Applicant submitted a final AMP on 10 April 2026, which was again referred to DOH by DWER on 14 April 2026 for review. DOH confirmed on 15 May 2026 that the AMP contained adequate provision to address the risk presented by the crushing and screening of ACM.

## 2.4 Department of Health advice

DWER referred all revisions of AMP's received to support the application to DOH for technical advice, as DOH are the overarching regulatory authority for the risk of asbestos exposure to human health.

A summary of DOH's advice on the various AMP revisions is as follows:

### **Aurora Environmental / Coterra Environmental AMP – Revision 2**

- DOH advised that they did not support the works approval due to insufficient information to assess public health risks
- Significant data gaps in asbestos characterisation were identified, including:
  - Sampling density far below DoH guideline (1/476 m<sup>3</sup> vs required ~1/25 m<sup>3</sup>).
  - No details on sampling methodology.
  - No assessment of asbestos fibres (AF/FA).
  - No identification of asbestos type or friability.
- Significant data gaps in validation sampling were identified, including:
  - The Proposed rate sampling (1 per 125 m<sup>3</sup>) is below guideline requirements.
  - No methodology was provided.
  - Fibre assessment was missing.
- Batching and rework limitations were identified, including:
  - Large 1000–2000 m<sup>3</sup> batches are difficult to manage if non-compliant.
  - DoH recommended smaller ~75 m<sup>3</sup> batches to enable practical re-testing.
- Dust and fibre management concerns were identified, including:

- Dust monitoring (PM10/PM2.5) is proposed, but no asbestos fibre monitoring is proposed.
- Heavy reliance on visual inspection, which is inadequate without proper characterisation.
- Compliance with the *Health (Asbestos) Regulations 1992* and WorkSafe requirements would need to be demonstrated.

### **ABEC Environmental Consulting AMP – Revision 1**

- DOH advised that this AMP is a substantial improvement on the previous submission, however concerns remained around the assumption of low contamination potential.
- DOH provided a provisional acceptance pathway, with the following inclusions recommended:
  - Stronger pre-processing inspection, aligning with DWER's high risk load procedure in the *Guideline: Managing asbestos at construction and demolition waste recycling facilities* (DWER Asbestos Guidelines).
  - Only proceed to crushing once the material is deemed free of asbestos
  - Maintenance of dust monitoring controls
  - Final product meeting DWER testing requirements as outlined in the DWER Asbestos Guidelines, being the following asbestos thresholds:
    - 0.001% w/w for fibres/fines (strict)
    - 0.05% w/w for bonded ACM (restricted to on-site commercial use only)
- DOH also recommended the following changes to the AMP:
  - Licensed removalist required for  $\geq 10$  m<sup>2</sup> bonded ACM sheeting.
  - Lower PM2.5 trigger to 25  $\mu\text{g}/\text{m}^3$  (from 50  $\mu\text{g}/\text{m}^3$ ).
  - No averaging of asbestos results should be undertaken.

### **ABEC Environmental Consulting AMP – Revision 2**

- DOH advised the plan is now largely acceptable and supported, subject to the below refinements:
  - Oversize material: treat all cement sheeting as potentially asbestos unless proven otherwise
  - Screening: Ensure dust management measures are explicitly integrated alongside fibre controls
  - Interred fill <600mm:
    - Apply full asbestos and dust controls during handling.
    - Install durable geotextile marker layer above buried material.
    - Implement ongoing site management plan, including maintenance of a cap and controls for future disturbance
    - Treat all stockpile footprint areas as potentially contaminated, unless proven otherwise.
  - Sampling approach: Remove requirement for 10 L field sampling for coarse material - visual inspection preferred and more practical for large material.
  - Non-compliant stockpiles must be disposed of as asbestos waste, unless an approved remediation/testing plan is agreed.

### **ABEC Environmental Consulting AMP – Revision 3**

- DOH advised that the AMP has been amended to address previous recommendations (from letter 6 March 2026)
- Based on the information presented in the AMP, DOH considers the additional recommendations have been addressed.
- The revised management plan is therefore supported by DOH for it to be implemented for the processing of the main stockpile.
- Following the completion of the works outlined in the AMP, it may be necessary to consider further management as part of an Ongoing Site Management Plan such as maintenance of geotextile cover and an unidentified finds procedure for any future intrusive site works.

## **2.5 Other Stakeholder advice**

Noting the application seeks authorisation to crush and screen asbestos contaminated C&D waste on site in open air, DWER requested comments other stakeholders with a direct interest in the application to inform DWER's risk assessment in relation to the crushing and screening of ACM. In addition to DOH, DWER consulted with:

1. The Local Government Authority - Shire of Serpentine-Jarrahdale (Shire);
2. Department of Local Government, Industry Regulation and Safety (LGIRS); and
3. King Road Brewery Company (KRB) located adjacent to the premises.

DWER sent formal correspondence to Stakeholders on 21 and 27 August 2025 which included the AMP and Asbestos Assessment prepared by Aurora Environment. Advice received from consulted stakeholders is summarised below.

### **2.5.1 Local Government Authority**

The Shire responded initially on 4 September 2025 providing the following advice:

- On 29 November 2018, the site was formally reported to the Department of Water and Environmental Regulation (DWER) as a known or suspected contaminated site under the Contaminated Sites Act.
- This followed the unauthorised stockpiling of approximately 30,000 m<sup>3</sup> of C&D waste, which triggered a formal investigation by the Shire.
- At its 15 July 2019 Ordinary Council Meeting, Council resolved to issue a Direction Notice under the Planning and Development Act 2005.
- The Direction Notice required the landowner to remove all stockpiled material, reinstate the land to its original condition, and submit an Environmental Assessment Report (EAR).
- The EAR, received on 25 October 2019, confirmed that the stockpiles contained asbestos-containing materials (ACM) and recommended safe removal of all waste to an approved offsite facility and the removal of 100 mm of surface soil to ensure asbestos clearance.
- Council accepted the EAR on 18 November 2019 and required a development application to be submitted by 1 March 2020, which was achieved; however, no further action occurred and the property was subsequently sold.
- In March 2025 Council approved a proposal for a Resource Recovery Centre and Transport Depot. The proposal included reusing existing stockpiled material to construct

hardstand areas, while also undertaking remediation of the site. Any ACM was to be identified and removed during this process.

- The application was referred to DWER, which raised no objections and confirmed that the remediation methodology is acceptable.
- The Shire supports the proposal on the basis that remediation is necessary to enable the site's development.
- A detailed Asbestos and Hazardous Materials Management Plan must be submitted and approved (in consultation with DWER and DOH) prior to any onsite works. The plan must:
  - address all aspects of asbestos and hazardous material handling, including registers, induction and training, PPE, site controls, signage, vehicle management, decontamination, air quality monitoring, waste disposal, and emergency response.
  - outline further investigative works, including:
    - Additional targeted sampling of stockpiled materials to better characterise contamination and determine suitability for reuse.
    - Assessment of surface and subsurface soils beneath stockpiles following their removal.
    - Groundwater investigations to confirm there has been no contamination impact.
    - specify appropriate controls for the safe relocation and reuse of stockpiled materials.
    - the preparation and submission of a site investigation report to the Shire and DWER prior to construction within affected areas.
- The enlargement of the existing transport depot will require Planning Approval from the Shire. An application to amend the existing Development Approval was lodged with the Shire on 1 May 2024.

**For noting:** DWER notes that the Asbestos and Hazardous Materials Management Plan required by the Shire broadly aligns with the final AMP provided by the applicant and endorsed by DOH.

It is also noted that a Planning Approval application has been submitted to the Shire. It is ultimately the responsibility of the applicant to ensure all relevant regulatory approvals are in place prior to undertaking activities authorised through a granted works approval.

## 2.5.2 Department of Local Government, Industry Regulation and Safety

LGIRS responded on 1 September 2025 providing the following advice.

- The proposed methodology for deconstructing the stockpile to inspect and segregate hazardous materials prior to crushing and screening is considered suitable, provided it is implemented as outlined.
- Dust management measures must prioritise eliminating or minimising dust at the source, not just protecting off-site receptors, with continuous wet processing and water cart use expected.
- Workers and contractors should receive asbestos awareness training, including identification, safe handling, and correct use of PPE.

- A licensed asbestos removalist is required where >10 m<sup>2</sup> of non-friable asbestos or any friable asbestos is identified, including:
  - Minimum 5 days notification to WorkSafe
  - Clearance inspection and certificate upon completion
- Plant and equipment should use enclosed cabins with high-efficiency air filtration to manage asbestos and silica exposure risks.
- Risks associated with crystalline silica (WHS Regulations 2022, Part 8A) must be assessed:
- The risk assessment must also define when respiratory protective equipment (AS1716 compliant) is required.

**For noting:** Whilst DWER does not have regulatory authority to enforce work health and safety requirements, the applicant is still required to note and comply with the above. DWER advises the applicant to liaise directly with LGIRS to further discuss work health and safety obligations relating to the crushing, screening and handling of ACM.

### 2.5.3 King Road Brewery Company

KRB formally objected to the application in correspondence dated 23 September 2025, and requested that DWER refuse the proposal to crush and screen ACM / C&D waste on site. As a neighbouring property, KRB raised concerns about potential impacts to its business operations, staff, and customers, particularly from noise, dust and airborne contaminants generated by open-air processing. KRB considered that these emissions would pose risks to public and occupational health, and would adversely affect the amenity, trade, and reputation of its hospitality venue, which relies on maintaining a clean, safe and pleasant environment. KRB further stated that, if processing is necessary, it should be undertaken offsite at a suitably equipped facility capable of safely managing ACM-contaminated material without exposing nearby receptors to risk.

In response to comments from KRB, the applicant corresponded directly with KRB to address their concerns. DWER were subsequently advised that KRB withdrew their formal objection.

## 2.6 Contaminated Sites advice

The premises was classified under the Contaminated Sites Act 2003 (CS Act) as *possibly contaminated – investigation required* on 29 January 2019 on the basis that ACM was present in stockpiles that contained crushed C&D waste and demolition waste of unknown origin that had been brought to site without relevant regulatory approvals.

DWER's Contaminated Sites Branch (CS) provided the following advice in relation to the current status of the premises:

- DWER have not received any reports for the purpose of addressing the 'actions required' by the classification (i.e. the reports have been submitted for the purposes of supporting development applications and works approvals). Initial, limited assessments were carried out on the low / western stockpile and the main stockpile. An additional assessment of the main stockpile carried out in June 2025 has assisted with characterising the material in greater detail and provided some limited assessment of the underlying sub-surface.
- Nonetheless, DWER does not hold any reports that have been developed in accordance with guidance on the assessment and management of contaminated sites within the legislative framework of the Act or in accordance with the department's contaminated sites guidelines and the 'National Environment Protection (Assessment of Site

Contamination) Measure 1999' (the NEPM).

- As such, it is advised that before the site can be reclassified from possibly contaminated – investigation required to an end-point classification, further works are required to develop a robust risk assessment in accordance with the relevant contaminated sites guidelines.
- The nature and timing of these deliverables will likely depend on how the stockpiled material is used (i.e. whether it is retained on-site or disposed offsite). Nonetheless, it is anticipated that a conceptual site model is developed and that health and environmental risk assessments are carried out as a minimum. This should include consideration of potential contamination impacts in both soil and groundwater.
- In addition, the department is aware of community concerns relating to dust/ fibre emissions and consideration should be given to whether a community engagement plan is necessary to assist with the community consultation process.

**For noting:** Works undertaken in accordance with works approval conditions do not mitigate the applicants' obligations under the CS Act.



Figure 1 premises map

Works approval: W3060/2025/1

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

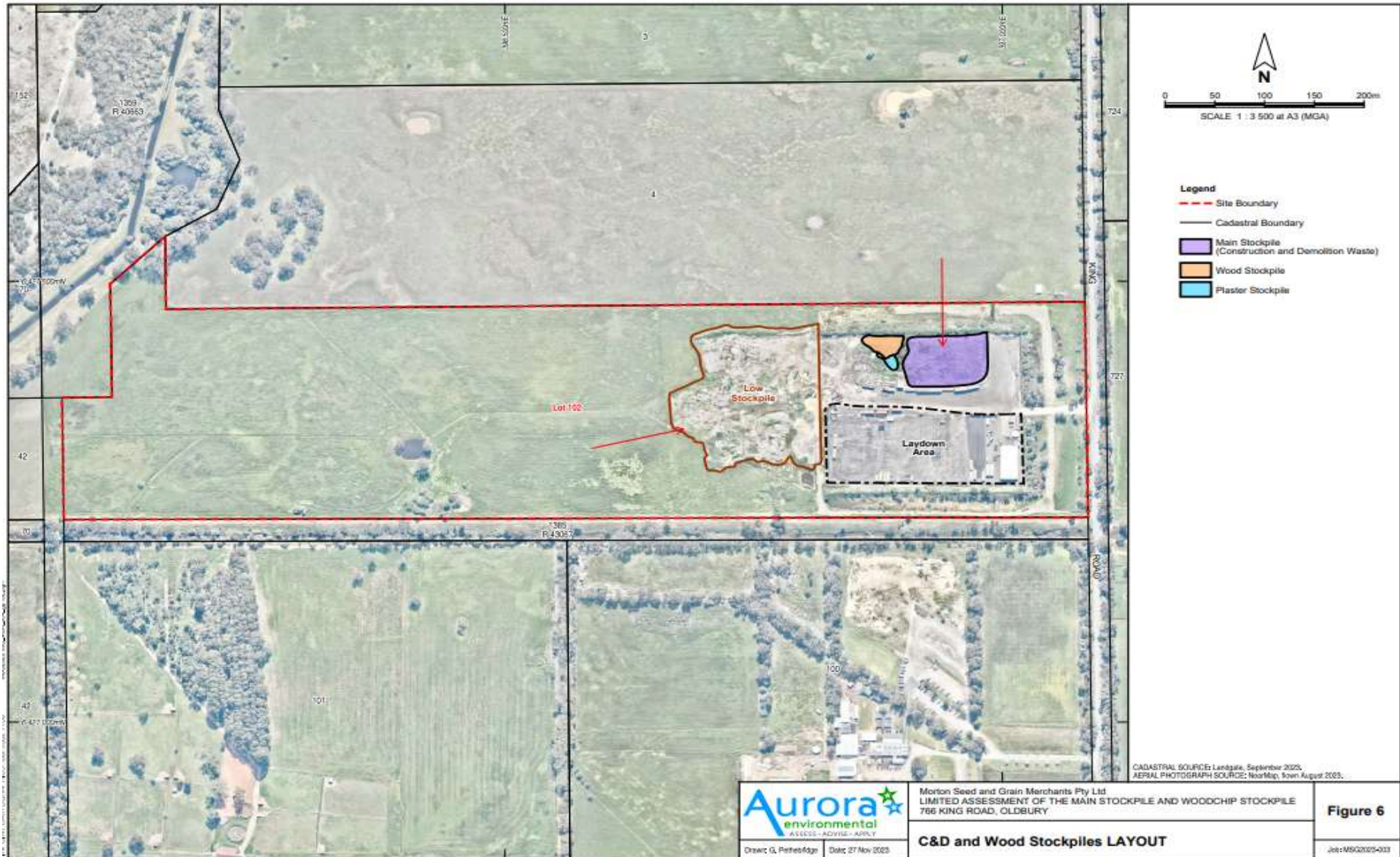


Figure 2 C&D Stockpile location

Works approval: W3060/2025/1

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

### 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 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.

**Table 2: Proposed applicant controls**

Emission	Sources	Potential pathways	Proposed controls
<b>Construction</b>			
Dust	Placement of crusher and screen and associated equipment including vehicle movements (reversing beepers).	Air / windborne pathway	Water Cart for dust suppression activities on the premises.
Noise		Air / windborne pathway	All onsite machinery fitted with mufflers. Complaints logbook.
<b>Time-limited Operations</b>			
Dust	Crushing and screening of C&D waste, vehicle movements, lift-off from stockpiles and/or stored products, earthworks etc.	Air / windborne pathway	D&C Waste will be wet using water sprays or water carts. Water Cart for dust suppression activities on the premises. Crusher inlet will wet material destined for crushing. Works will halt in adverse winds >29 km/hr. Three real time PM <sub>2.5</sub> and PM <sub>10</sub> dust monitors will be established around the works area. The monitors will have 15-minute rolling averages of PM <sub>10</sub> and PM <sub>2.5</sub> at 50 ug/m <sup>3</sup> and 50 ug/m <sup>3</sup> respectively. Crushing activities will be monitored and supervised. Damping of loads for tipping. Minimising waste handling. Use wind netting on fences and site perimeter where necessary.

Emission	Sources	Potential pathways	Proposed controls
Noise	Crushing and screening of C&D waste, vehicle movements, lift-off from stockpiles and/or stored product, earthworks etc.	Air / windborne pathway	<p>Compliance with the <i>Environmental Protection Noise Regulations 1997</i></p> <p>Crushing and screening equipment will be shielded by a 3 x container high noise wall to the south and east. The location is also within the 4 m bunded compound of the transport depot.</p> <p>Short duration program.</p> <p>Works will only be undertaken during the hours 0700 – 1800 Monday to Friday.</p> <p>All onsite machinery fitted with mufflers.</p> <p>Complaints logbook.</p>
Asbestos fibres	Crushing and screening of C&D waste	Air / windborne pathway	<p>Compliance with the AMP approved and supported by the DOH.</p> <p>Testing and monitoring of the C&amp;D Waste for asbestos prior to crushing and screening activities.</p> <p>Compliance with the Guideline: Managing asbestos at construction and demolition waste recycling facilities (Asbestos Guidelines).</p> <p>Experienced environmental scientists onsite to monitor / manage asbestos.</p> <p>Suitable enclosed bins onsite to store asbestos prior to removal off-site.</p> <p>Compliance with <i>Environmental Protection (Controlled Waste) Regulations 2004</i> for asbestos packaging and disposal requirements.</p> <p>Compliance with CS Act.</p> <p>Compliance with <i>Health (Asbestos) Regulations 1992</i>.</p>
Asbestos	Crushed C&D waste to be used as fill for an on-site Hardstand pad.	Air / windborne pathway	<p>Crushed and screened C&amp;D waste will be tested in accordance with the Asbestos Guidelines prior to reuse.</p> <p>Product that does not meet specifications will be disposed of as ACM waste.</p>
Contaminated Stormwater	Crushing and screening of construction and demolition waste	Overland run-off and seepage to groundwater	<p>An updated stormwater design for the site has been prepared as part of the Development Approval and this design is based on providing onsite detention for stormwater in accordance with relevant design codes.</p> <p>Maintenance of stormwater infrastructure to divert stormwater way from C&amp;D Stockpile.</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.

Table 3 and Figure 5 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

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

Human receptors	Distance from prescribed activity
Residential Premises 771 King Road, Oldbury	~130m south-east of the prescribed premises laydown area
Residential Premises 693 Mundijong Road, Mardella	~640m south-west of the prescribed premises laydown area
Residential Premises 825 Mundijong Road, Mardella	~650m south-west of the prescribed premises laydown area
Residential Premises 668 King Road, Oldbury	~850m north of the prescribed premises excavation area
Residential Premises 654 King Road, Oldbury	~970m north of the prescribed premises excavation area
King Road Brewing Co	~190m south of the prescribed premises excavation area
Environmental receptors	Distance from prescribed activity
Oaklands Main Drain (minor seasonal watercourse running off the Folly River)	Runs parallel with the prescribed premises boundary on the southern border
Underlying groundwater	Perth Groundwater Map reports a depth to groundwater of 2.72 mbgl.  Aurora stockpile reports indicate groundwater being encountered between 0.6m and 1.2 meters below top of stockpile.  The applicant has reported that four shallow groundwater wells were installed during November 2024 on the premises to assess groundwater quality and flow directions.
Threatened Ecological Communities	Four communities located within 2 km of the prescribed premises area
Threatened and priority fauna	Four species located within 2 km of the prescribed premises area

Threatened and priority flora	One species located within 2 km of the prescribed premises area
Acid Sulphate Soils	Located within a moderate to low-risk area (3m of natural soil surface) High to moderate risk beyond 3m of natural soil surface

### 3.2 Meteorology

#### 3.2.1 Wind direction and strength

Predominant summer wind conditions include the morning easterly wind and afternoon south-westerly winds. Predominant winter wind directions are from the northerly direction in the mornings and westerly direction in the afternoons. Figure 3 and 4 provide the respective Windrose for 9am and 3pm.

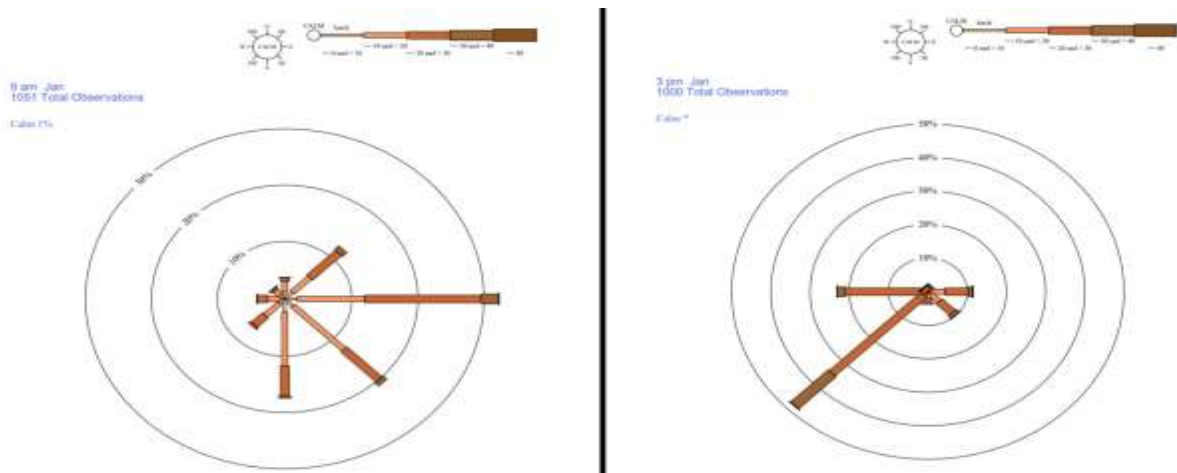


Figure 3: January 9am and 3pm Windrose

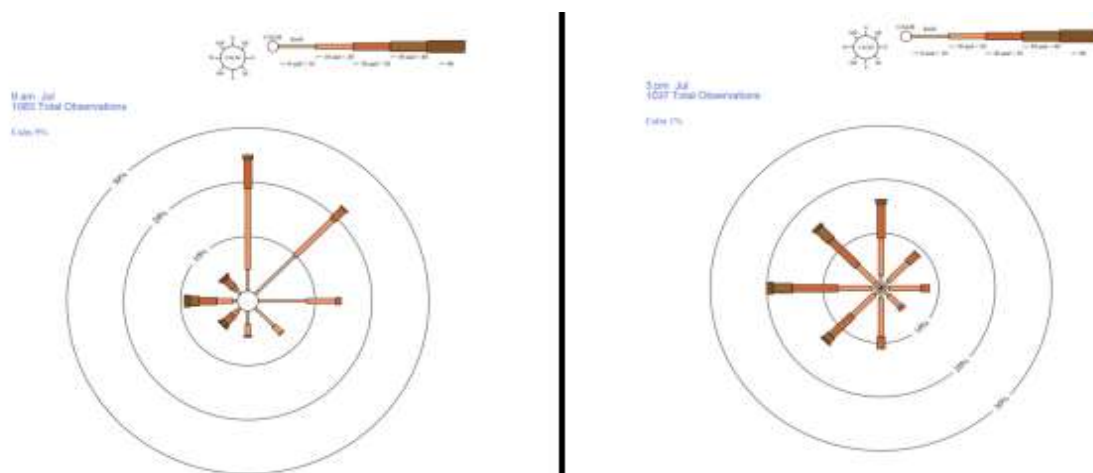


Figure 4: July 9am and 3pm Windrose

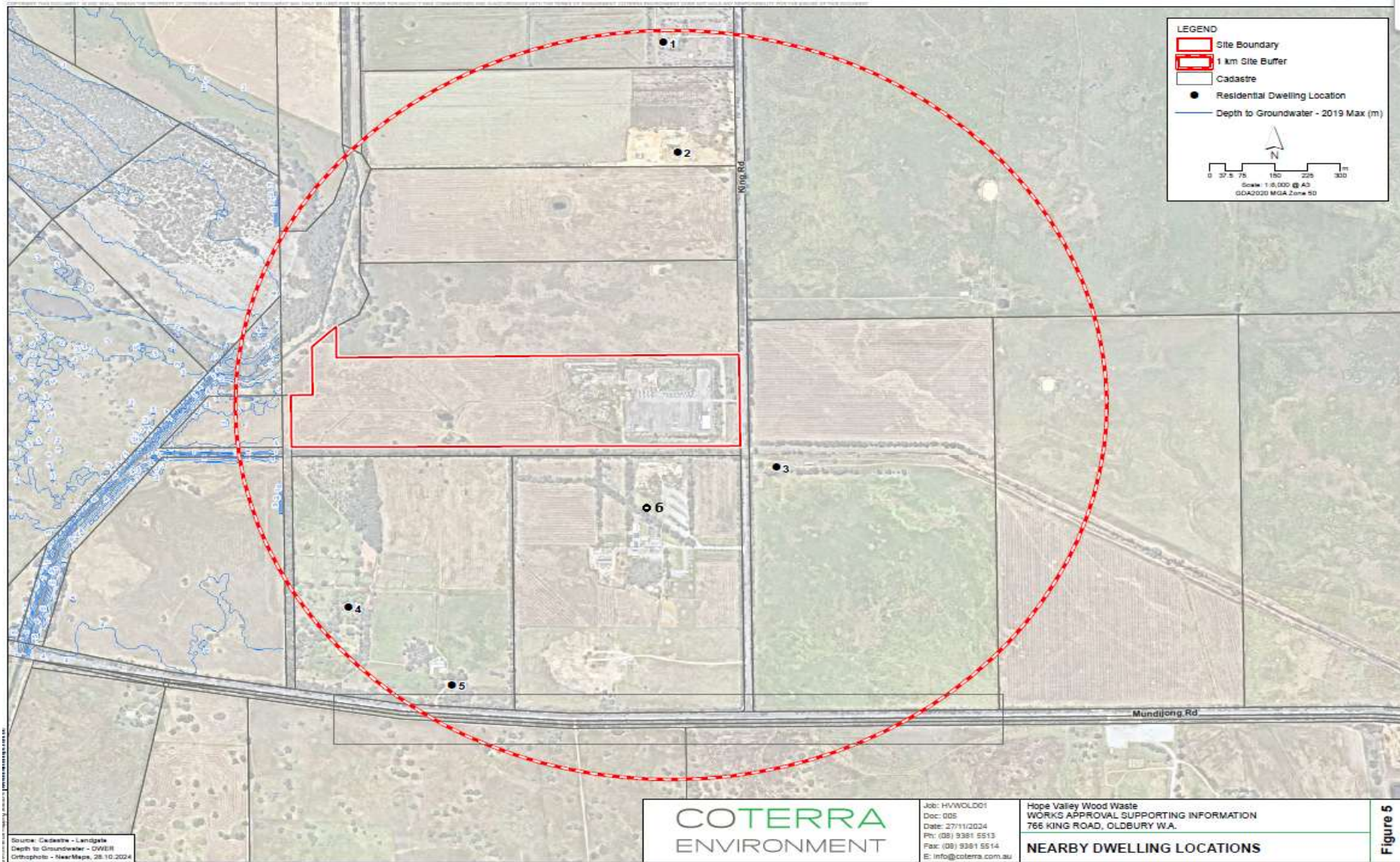


Figure 5: Distance to sensitive receptors

Works approval: W3060/2025/1

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

### 3.3 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 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 W3060 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

No licence is required following the time-limited operational phase authorised under the works approval as the crushing and screening of waste will be completed through the time limited operations period within the works approval. A risk assessment for the time limited operational phase has been included in this decision report.

**Table 4: Risk assessment of potential emissions and discharges from the premises during construction and Time-limited operations**

Risk events					Risk rating <sup>1</sup>	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	C = consequence L = likelihood			
<b>Construction</b>								
Placement of crusher and screen and associated equipment including vehicle movements (reversing beepers).	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 130 m southeast, 190 m south, 640 m southwest, 650 m southwest, 850 m north and 970 m north of the laydown area	Refer to Section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	N/A	The Delegated Officer has considered the scale of the works and the separation distance between the source and receptors and considers that dust emission impacts are not foreseeable.  Dust can be adequately regulated by section 49 of the EP Act.
	Noise			Refer to Section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	N/A	The Delegated Officer has considered the separation distance between the source and receptors and considers that impacts from noise emissions are not foreseeable.  Noise emissions are adequately regulated under the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations).
<b>Operation - Time-limited-operations</b>								
Screening, crushing, unloading, loading and storage of material  Vehicle movements	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 130 m southeast, 190 m south, 640 m southwest, 650 m southwest, 850 m north and 970 m north of the laydown area	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	Conditions 1, 6, 7, 9, 10, 12, 19, 20, 21 22, 23, 24.	The Delegated Officer considers controls proposed by the applicant for the mitigation of dust emissions during handling, crushing and screening activities are sufficient to mitigate dust emissions.
	Noise	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	N/A	The Delegated Officer has considered the separation distance between the source and receptors and considers that impacts from noise emissions are not foreseeable.  Noise emissions are adequately regulated under the Noise Regulations.

Works approval: W3060/2025/1

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				
	Asbestos fibres	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Severe L = Unlikely <b>High Risk</b>	Y	Conditions 1, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24.	Refer to Section 3.4 below.
	Sediment laden stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Seasonal watercourse Drain – southern premises boundary	Refer to Section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	Condition 1 and 7	N/A
Reuse of crushed and screened C&D waste	Asbestos fibres	Air / windborne pathway causing impacts to health and amenity	Residences 130 m southeast, 190 m south, 640 m southwest, 650 m southwest, 850 m north and 970 m north of the laydown area	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	Conditions 11, 12, 13, 14, 15, 16, 17, 22, 23.	The applicant has advised that the product testing specifications outlined in the DWER Asbestos Guidelines will be adhered to and achieved prior to any material being reused.  The Delegated Officer has reflected this commitment in works approval conditions.

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.

## 3.4 Detailed risk assessment for Asbestos fibres

### 3.4.1 Identification and general characterisation of emission

Asbestos is a hazardous material that can cause mesothelioma, asbestosis or lung cancer. Asbestos was used extensively in Australian buildings and structures from the 1950's through to 1990. Asbestos becomes a risk to human receptors when disturbed or broken into smaller pieces, where fine particle Asbestos fibres can be released and transported long distances by air or wind dispersal. In the context of the premises, predominant summer wind conditions include the morning easterly wind and afternoon south-westerly winds. Predominant winter wind directions are from the northerly direction in the mornings and westerly direction in the afternoons.

The Applicant intends to crush and screen a C&D Waste stockpile contaminated with Asbestos and ACM in open air, then use the crushed and screened material as fill for hardstand construction on the premises. Whilst the handling of ACM contains an innate risk of Asbestos fibre release, the risk significantly increases when ACM is crushed or screened.

### 3.4.2 Description of potential adverse impact from the emission

Potential impacts from asbestos fibre emissions include health impacts such as asbestosis, mesothelioma and/or lung cancer at nearby residential premises. The frequency and time of exposure of receptors to asbestos fibres would vary depending on the degree of contamination of the waste materials crushed and screened at the Premises, and the potential for asbestos fibres to be transported on prevailing winds.

As the waste stockpile is not homogenous and there is potential for Asbestos to be present in unknown quantities, concentrations and forms, the risk of inadvertent crushing and screening of ACM increases.

If ACM is crushed and screened in significant quantities and this material is reused on site as hardstand, there will be ongoing risk of asbestos fibre lift off as the hardstand is trafficked or disturbed.

### 3.4.3 Criteria for assessment

DWER considers that the following guidelines will apply to the regulation of crushing and screening ACM in open air under Part V of the EP Act, noting that legislation from other regulatory authorities will also need to be taken into consideration by the applicant:

- *Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia (Department of Health WA, May 2009)*
- *Guideline: Managing asbestos at construction and demolition waste recycling facilities (Department of Water and Environmental Regulation, April 2021)*

### 3.4.4 Applicant controls

The Applicant has provided several revisions of an AMP, with all revisions referred by DWER to DOH for technical advice. The final revision of the AMP prepared by ABEC Environmental Consulting has been approved and supported by DOH, demonstrating that the crushing and screening of the C&D Waste stockpile, and the reuse of the material as fill, can be undertaken in a manner that minimizes the risk of asbestos fibre release and subsequent human health impacts.

A broad overview of the applicants proposed controls outlined within the AMP is included below.

**Table 5: Applicant’s proposed controls for Asbestos**

Controls for Asbestos Fibre (Time-limited operation)	
Control	Description
Adherence to the specifications of the AMP (ABEC Environmental Consulting)	<ul style="list-style-type: none"> <li>• Keep materials wet (damping, water sprays) to prevent airborne fibres</li> <li>• Use wet crushing and screening processes</li> <li>• Apply dust suppression (water carts, sprays, binders, covers) to stockpiles and roads</li> <li>• Avoid work during high winds and adjust work to weather conditions</li> <li>• Stop work if visible dust leaves site</li> <li>• Conduct routine visual inspections of stockpiles and processed material</li> <li>• Segregate and remove ACM before crushing/screening</li> <li>• Treat suspected materials as asbestos until proven otherwise</li> <li>• Stop work and isolate area if significant ACM is found</li> <li>• Undertake airborne fibre monitoring (AFM) at work boundaries</li> <li>• Maintain fibre levels below 0.01 fibres/mL (action levels trigger review/cessation)</li> <li>• Conduct dust monitoring (PM10 / PM2.5) with real-time alarms</li> <li>• Sample and test processed materials to confirm asbestos levels below limits (<math>\leq 0.001\%</math> w/w)</li> <li>• Pre-sort stockpiles to remove hazardous materials before crushing</li> <li>• Limit batch sizes (<math>\leq 2000 \text{ m}^3</math>) and keep stockpiles separate and labelled</li> <li>• Continue inspection during processing</li> <li>• Prevent mixing of tested and untested materials</li> <li>• Keep ACM wet, contained and secured during handling</li> <li>• Bag, label and store asbestos waste in dedicated containers</li> <li>• Dispose of asbestos at licensed facilities with full tracking records</li> <li>• Use approved procedures and trained personnel (or licensed removalists where required)</li> </ul>

### 3.4.5 Consequence

If Asbestos fibre emissions occur, then the Delegated Officer has determined that the impact of Asbestos fibre emissions will result in adverse health effects requiring a high level or ongoing medical treatment. Therefore, the Delegated Officer considers the consequence to be **Severe**.

### 3.4.6 Consequence

The Delegated Officer has determined that impacts from Asbestos fibre emissions will probably not occur in most circumstances if the applicants proposed controls are adhered to. Therefore, the Delegated Officer considers the likelihood of Asbestos fibre emissions to be **Unlikely**.

### 3.4.7 Overall Risk Rating

The Delegated Officer has compared the consequence and likelihood ratings described above with DWER’s risk rating matrix and determined that the overall rating for the risk of Asbestos fibre emissions is **High**.

### 3.4.8 Key findings

The Delegated Officer considers that the crushing and screening of the C&D waste stockpile will be acceptable subject to conditions within the time limited operations phase of the works approval.

Adequate characterisation of the waste prior to crushing and screening occurring is critical to ensure no crushing and screening of visible asbestos will be undertaken. The maintenance of waste in a damp state through handling, crushing and screening, will also be required to ensure that no release of asbestos fibres will occur during these activities if particulate asbestos is present within the stockpile and inadvertently processed.

Monitoring for asbestos fibre release and dust emissions at the work boundary will ensure that works cease if asbestos fibres are detected.

The testing of crushed and screened material prior to reuse on site, and the reuse of material only meeting a concentration of  $\leq 0.001\%$  w/w asbestos or ACM, will ensure that no residual risk of asbestos fibre release will be present for the operational life of the premises.

## 4. Consultation

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

**Table 6: Consultation**

Consultation method	Comments received	Department response
Application advertised on the department's website on 9 September 2025	None received	Noted.
Local Government Authority advised of proposal on 21 August 2025	The Shire of Serpentine Jarrahdale replied on 1 September 2025.	Refer to Section 2.5.1 of the Decision Report.
Department of Local Government, Industry Regulation and Safety (LGIRS) advised of proposal 21 August 2025.	LGIRS replied on 1 September 2025. Refer to section 2.4.3 of the Decision Report	Refer to Section 2.5.2 of the Decision Report.
Department of Health (DoH) initially advised of proposal on 21 August 2025.	DoH initially replied on 2 September 2025.	Refer to Section 2.4. of the Decision Report.
King Road Brewery Company (KRB) advised of proposal on 27 August 2025	KRB responded on 26 September 2025.	Refer to Section 2.5.3 of the Decision Report.
Applicant was provided with draft documents on 15 May 2026	Applicant responded on 21 May 2026. Provided: <ul style="list-style-type: none"> <li>Registered Address details;</li> </ul>	The Department of Health has approved the Asbestos Management Plan for the premises, which specifies that dust monitoring will be undertaken using 15-minute

	<ul style="list-style-type: none"> <li>• Requested Table 1 only monitoring PM 10 or 2.5;</li> <li>• Confirmed type of Asbestos Fibres monitors; and</li> <li>• Updated Premises Maps</li> </ul>	<p>rolling averages of PM10 and PM2.5.</p> <p>The Delegated Officer therefore considers that this change is not appropriate, and monitoring for PM10 and PM2.5 will be retained in the works approval.</p> <p>All other information provided by the applicant has been incorporated into the final works approval.</p>
--	---	--

## 5. Conclusion

Based on the assessment in this decision report, the Delegated Officer has determined that a works approval 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.
4. Department of Health, 2009, *Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia*, Perth, Western Australia
5. DWER 2021, *Guideline: Managing asbestos at construction and demolition waste recycling facilities*, Perth, Western Australia
6. ABEC Environmental Consulting Pty Ltd, 2026, *Asbestos Contaminated Stockpile Management Plan, 766 King Road, Oldbury, 6121, Dunsborough*, Western Australia