



## Application for Licence Amendment

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

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<b>Licence Number</b>	L7291/1995/9
<b>Licence Holder</b>	Cockburn Cement Limited
<b>ACN</b>	008 673 470
<b>File Number</b>	2013/000895-1~1
<b>Premises</b>	Dongara Lime Plant Kailis Drive DONGARA WA 6525  Legal description – Mining Tenement M70/311 Victoria Location 11702 Kailis Drive DONGARA WA 6525  As defined by the premises maps attached to the Revised Licence
<b>Date of Report</b>	04/05/2023
<b>Decision</b>	Revised licence granted

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## 1. Decision summary

Licence L7291/1995/9 is held by Cockburn Cement Limited (licence holder, CCL) for the Dongara Lime Plant (the premises), located at Mining Tenement 70/311, Kailis Drive, Dongara within the Shire of Irwin.

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 L7291/1995/9 has been granted.

The revised licence issued because of this amendment consolidates and supersedes the existing licence previously granted in relation to the premises. The revised licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

## 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 14 October 2022, the licence holder submitted an application to the department to amend licence L7291/1995/9 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendment is being sought:

- to include category 12 screening to operate mobile screening plants.

The existing licence operates under category 43 – cement or lime manufacturing and has an assessed production of 100,000 tonnes per year.

Currently the licence holder utilises a mobile screening plant that removes organic matter from the lime sand within the cleared sand dunes as part of the lime manufacturing process with an existing annual throughput of 20,000 tonnes. The licence holder proposes to operate a second mobile screening plant to increase their screening of bulk lime sand extracted from the dunes in sandpits 3 and 4, and future sandpit 2. The screened lime sand will be blended with recovered lime kiln dust to produce Aglime for agricultural use or will be used within the existing lime manufacturing plant.

The licence holder has sought a licence amendment as a combined screening activity for lime sand is estimated to be 380,000 tonnes per year, which will meet the prescribed premises threshold for licencing.

No changes to the aspects of the existing licence relating to Category 43 lime manufacturing have been requested by the licence holder.

#### 2.2.1 Operation

The active sand dunes from which the lime sand will be extracted to produce Aglime and support the lime manufacturing plant have previously been cleared under a clearing permit (CPS 8883/1) and mined. The project does not involve construction works or commissioning. An existing and additional mobile vibrating screen with 10 mm woven wire and associated hoppers and supporting loaders will be brought onto the premises to operate. No solid wastes are to be created from the screening activities.

A McClosky S190 screen will be operated to dry screen the surface layer of dunes for raw sand feed into the lime plant. The screen is located at the base of the active mining faces (sandpits) sand production. The screened vegetation is used for the rehabilitation of mined areas. Screening occurs when required between 6 am to 4 pm. Minimal movement of the screen is expected.

A Striker SC125 screen will be used for seasonal use in the agricultural sand blends. Raw lime sand from the sand pits is dry screened, blended with reject material (lime kiln dust) and mixed with molasses to bind the material. Aglime is stacked onto a 50-tonne stockpile within the sandpits. All vegetation resulting from the screening is used for rehabilitation. Screening activities when required will be operated between 7 am and 2 pm. Minimal movement of the screen is expected.

## 2.3 Consolidation of Licence

As part of this amendment package the department has consolidated the licence by incorporating changes made under the Amendment Notices as summarised in Table 1.

**Table 1: Licences consolidated in this amendment**

Instrument	Issued	Summary of approval
L7291/1995/9	29/4/2016	Notice of Amendment of licence expiry dates. Licence expiry changed from 28 April 2019 to the 28 April 2025
L7291/1995/9	16/05/2022	Notice of Amendment reporting requirements for AER and AACR. AER due on 31/4/2024 and biennially thereafter. AACR due on the 31/3/2023 and annually thereafter.

The obligations of the licence holder have not changed in consolidating the licence. The department has not undertaken any additional risk assessment of the premises related to previous Amendment Notices.

In consolidating the licence, the CEO has:

- updated the format and appearance of the Licence;
- deleted the redundant AACR form set out in schedule 1 of the previous licence and advise the licensee to obtain the form from the department’s website;
- revised licence condition’s numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The full consolidation of licence conditions as they relate to this revised licence are detailed in Section 6.1.

## 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 premise operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

**Table 2: Licence holder controls**

Emission	Sources	Potential pathways	Proposed controls (from application)
Dust	<p>Screening, unloading, loading and storage of screening feedstocks and products</p> <p>Onsite vehicle movements (loaders and haulage trucks)</p>	Air/windborne pathway	<p>No dust emission expected due to the coarse nature of the sand and moisture content.</p> <p>Water sprayers, located at sandpit 4 for screening activities.</p> <p>20,000 L water cart available onsite at sandpit 2 and 3 for screening activities.</p> <p>Chemical suppression is available on site if required for dust suppression within all sand pits, stockpiles, and haul roads.</p> <p>Haul roads have water truck to reduce dust.</p> <p>Screened lime sand is transported internally on site at a moisture 2% to ensure no dust is generated. Testing of moisture content occurs every 24 hours within onsite laboratory for operational controls.</p> <p>Tarpaulins fitted on haulage trucks when moving offsite.</p> <p>Molasses added to Aglime to bind particles and forms a crust on the surface of the stockpile.</p> <p>Stockpile heights in sandpit 3 is maintained below the sandpit wall height.</p> <p>Stockpile heights in sandpit 4 for lime sand and Aglime is maintained below the sandpit height.</p> <p>Aglime is stored only in sandpit 4.</p> <p>Stockpiles heights are well below the sandpit wall heights.</p> <p>Repurposed material transported to sandpit 4 to produce Aglime passes through 3m auger containing automated water outlet to a ratio of 1:5 water to repurposed material.</p>
Noise		Air/windborne pathway	<p>Screeners only to be operated between "day-time" hours (6am to 4pm and 7 am to 2 pm).</p> <p>Screeners only to operate within pits 2, 3 and 4</p>

Emission	Sources	Potential pathways	Proposed controls (from application)
			Location of screens 1.7 km NE from nearest residential premises.
Contaminated stormwater	Spills and leaks of diesel stored on site.	Overland flow and infiltration to soil	Diesel oil stored in impervious concrete bunds with 110% capacity of storage volume.

### 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 3 below provides a summary of potential human and environmental receptors that may be impacted because 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 - Dongara	3 km north northwest of the nearest proposed screen location (sandpit 3)
Rural residential – Springfield subdivision	1.7 m northeast of the nearest proposed screen location (sandpit 3)
Rural residential - subdivision	1.7 km east of the nearest proposed screen location (sandpit 4)
Environmental receptors	Distance from prescribed activity
Beekeepers Nature Reserve	Adjacent to the boundary of the premises on the east and southern sides.
Arrowsmith Groundwater Area Dongara, Perth – Superficial Swan Aquifer	Groundwater ranges from 0-5, 5-10 10-20 mbgl elevation linked.

## 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 considers 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 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 4.

The revised licence L7291/1995/9 that accompanies this Amendment Report authorises emissions associated with the operation of the premises i.e. screening activities for lime sand.

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

**Table 4. Risk assessment of potential emissions and discharges from the premises during operation**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder's controls				
<b>Operation</b>								
Screening, unloading, loading and storage of material Vehicle movements	Dust	Air/windborne pathway causing impacts to amenity	Residences 1.7 km east and northeast of screen locations	Water sprayers, chemical suppression, and water carts available. Tarpaulins on offsite trucks. Molasses added to stockpiled Aglime. Transferred material kept at 2% moisture level. Moisture level tested in laboratory every 24 hours when operating. Stockpile heights below pit levels. Refer to Section 3.1	Low level impact to amenity at local scale C = Minor The risk event will probably not occur in most circumstances L = Unlikely <b>Medium Risk</b>	N	Condition 1	The delegated officer considered the location of the screening activities to the nearest sensitive receptors, the coarse nature of the sand, the licence holders management operations including stockpile heights for sand pits 2, 3 and 4, testing of lime sand every 24 hours for moisture content when operating, that molasses is blended into the Aglime before stockpiling in sandpit 4, and the licence holders controls consisting of water sprays, chemical suppressants, truck tarpaulins for offsite movements and determined that the risk of dust impacting the amenity of the closest receptors to be medium.  The delegated officer considered the licence holder's controls to be insufficient and determined that additional controls for sandpits 2, 3 and 4 were required for stockpile heights to be maintained 2 metres below the lowest pit wall for each pit. The delegated officer determined that the stockpile heights for sandpit 3 could be consistently used for sandpit 2, knowing that the two sandpits are likely to merge into each other in the future.  The delegated officer considered that the licence holder's controls were essential to managing dust emissions and were conditioned within the licence.
	Noise	Air/windborne pathway causing impacts to amenity	Residences 1.7 km east and northeast of screen locations	Screening locations. Refer to Section 3.1	Low level impact to amenity at local scale C = Minor The risk event will probably not occur in most circumstances L = Unlikely <b>Medium Risk</b>	Y	Condition 1	The delegated officer considered the location of the screening to the nearest sensitive receptors and determined that the risk of noise impacting the amenity of the closest neighbours was medium. The delegated officer considered the licence holder's controls consisting of the location of screens within two sand pit mining areas and determined that the licence holder's controls were sufficient to manage noise and were conditioned within the licence.  Furthermore, the operation of the screen will need to be compliant with the EP Noise Regulations at the closest residences located 1.7 km to the east and northeast of the screen operation areas.
	Spills, leaks of hydrocarbons and contaminated stormwater	Overland runoff potentially contaminates soil and groundwater	Beekeepers Nature Reserve is adjacent to the boundary of the premises on the east and southern sides. Dongara, Perth – Superficial Swan Aquifer Groundwater 0-5 m from the surface.,	Diesel fuel is kept within a concrete bunded area with a 110% storage capacity Refer to Section 3.1	Onsite impact low level to the environment C = Minor The risk event may only happen in exceptional circumstances L = Rare <b>Low Risk</b>	Y	Condition 1	The delegated officer considered the depth of groundwater, the nature reserve adjacent to the premises, and the licence holder's controls and considered that the risk to the environment was low. The delegated officer considered the licence holder's controls for containment structures of diesel oil to be sufficient. Noting that conditions within the existing licence for hydrocarbon storage were sufficient and the delegated officer determined that further operational conditions to manage the risk to the environment were not required.

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 the department.



## 4. Consultation

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

**Table 5: Consultation**

Consultation method	Comments received	Department response
The Shire of Irwin advised of proposal on the 9 January 2023.	The Shire of Irwin replied on 31/01/2023 confirming that they had no comment.	The delegated officer notes this information
Licence Holder was provided with draft amendment on 14 February 2023 and was provided with a second draft on 30 March 2023.	The licence holder provided comments on the 10 March 2023 and 10 April 2023. Refer to Appendix 1	Refer to Appendix 1

## 5. Decision

The delegated officer has completed an assessment of the application and determined to grant the licence amendment. The revised licence will be subject to conditions consistent with the risk assessment outcomes and generally reflect the licence holder's proposed controls that were considered reasonable and adequate to manage the risk of unacceptable impacts.

The delegated officer's decision considered the following:

- the two mobile screens and hoppers are not expected to change the profile of noise and dust emissions from the premises, considering the screens are only to be operated within sandpits 2, 3 and 4;
- the licence holder's dust and noise controls were considered appropriate and will be conditioned in the licence to minimise dust and noise emissions to the nearest sensitive receptor which is 1.7 km away from the source;
- regulatory controls for stockpile heights (noise and dust controls) in sandpit 2, 3 and 4;
- spills, leaks, and stormwater controls for fuel storage are presently managed through the existing licence conditions, and
- the proposed operation is with an existing mining area.

## 6. 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.

### 6.1 Summary of amendments

The licence has been updated to the newest licensing format with the following conditions being added to the revised licence, they are:

- standard reporting conditions for book and complaint management, and
- authorised air emission points and stack infrastructure operational details based on information supplied by the licence holder.

Table 6 provides a summary of the proposed amendments and the conversion of the existing licence to the updated format 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 6: Summary of new and consolidation of licence conditions in this amendment**

Existing condition or new condition	Condition summary	Revised licence condition or new condition	Conversion notes
N/A		Registered business address	In accordance with revised licence format
N/A	Expiry date	Revised expiry 28/04/2025	In accordance with the Notice of Amendment of Licence Expiry Dates (29/04/2016)
N/A	Prescribed premises category description Category 43	No changes	Moved to front cover as per new licence format
N/A	Preamble	Deleted	Redundant condition. Revised to current licensing format.
N/A	Definitions	Definitions Table 6	Moved to back of conditions and definitions update and redundant conditions deleted.
General Conditions G1a, G1b	Person in charge to have access to conditions	Deleted	Redundant condition, unenforceable, deleted from licence.
General Conditions G2a G2b	Reporting requirements	Condition 12	Revised to current licensing format and merged to standard exceedance reporting condition.
General Conditions G3	Annual Audit Compliance Report (AACR)	Condition 8	Revised to current licensing format. 31 March has been changed to 90 days (equivalent period).
General Conditions G4	Annual Environmental Report	Condition 11 and Table 5	Revised to current licensing format. 31 March has been changed to 90 days (equivalent period). In accordance with the Notice of Amendment for reporting requirements, AER has been updated to include biennial reporting from 2024.  Additional reporting items have been added to report on new activity. Existing reporting items have been updated for new format.
Air pollution controls conditions A1a, A1b, A1c	General plant – dust generation prevention	N/A	Redundant condition. Adequately covered by s.49 of the EP Act 1986. Deleted from licence.
Air pollution controls conditions A2a, A2b, A2c, A2d	Dust- Maintenance of collection and control systems	Condition 1 Table 1 Item 1a, 1b, 1c and 1d and Item 2a	Revised to current licensing format.

Existing condition or new condition	Condition summary	Revised licence condition or new condition	Conversion notes
Air pollution controls A3	Stack- particulates emission limit	Condition 3 and Condition 4	Revised to new licensing format with conditions to ensure limit monitoring equipment is maintained and operatable.
Air pollution controls conditions A4	Lime stack kiln – NOx discharge limit and target	Condition 3 and Condition 4	Revised to new licensing format with condition to ensure limit monitoring equipment is maintained.
Air pollution controls conditions A5a	Stack testing	Condition 5, Table 4	Revised to new licensing format and stack testing methods updated.
Air pollution controls conditions A5b	Stack testing and reporting results	Condition 6 Condition 11	Revised to new licensing format, two conditions to record and then report data.
Water pollution control conditions W1a	Liquid chemical storage	Condition 1, Table 1 Item 3a, 3b	Revised to new licensing format
Water pollution control conditions W1b	Liquid chemical storage	Condition 1, Table 1 Items 3c, 3d, 3e, 3f, 3g, 3h	Revised to new licensing format
Water pollution control conditions W1c	Liquid Chemical storage	Condition 1, Table 1 Items 5l	Revised to new licensing format
Water pollution control conditions W2	Vehicle washdown areas	Condition 1, Table 1, Item 4a, 4b	Revised to new licensing format
Water pollution control conditions W3a	Waste management from ancillary premises	Condition 1, Table 1, Item 5a, 5b	Revised to new licensing format
Water pollution control conditions W3b	Waste management from ancillary premises	Condition 1, Table 1, Item 5c	Revised to new licensing format
Water pollution control conditions W3b	Waste management from ancillary premises	Condition 1, Table 1, Item 6a, 6b	Revised to new licensing format
Attachment 2 Sections A, B and C	Annual Audit compliance Report	Deleted	Redundant attachment. Deleted from Licence Forms accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
Attachment 1	Premises Map	Schedule 1 Figure 1	Revised to new licensing format.

Existing condition or new condition	Condition summary	Revised licence condition or new condition	Conversion notes
New	Prescribed premises category description	Category 12 added	Prescribed category added as per amendment
New	Licence History	Licence History	Revised to new licence format.
New	Interpretation	Interpretation section	Revised to new licence format
New	Stacks and sensor	Condition 1 Table 1 Item 2a, 2b, 2c	Condition added as stacks and sensors are critical infrastructure that was not listed. New licensing format requires all critical pollution control equipment to be listed. Applicant supplied details.
New	Mobile screen infrastructure operation	Condition 1 Table 1 Item 7a, 7b, 7c, 7d, 7e, 7f, 7g, 7h, 7i, and Item 8a and 8b.	New conditions. Applicant controls to operate screening activities.
New	Authorise discharge points	Condition 2 table 2	Condition added as all emission points require authorisation to emit or discharge pollutants. Applicant supplied details.
New	Monitoring methods	Condition 5	Methods for annual stack sampling have been updated to standard USEPA methods for CO, NOx and moisture content.
New	Records and reporting - Complaints	Condition 7	Standard condition for complaint reporting for new licensing format.
New	Records and reporting - Audible books	Condition 9	Standard condition for book management and reporting for new licensing format.
New	Records and reporting - Books management	Condition 10	Standard condition for book management and reporting for new licensing format.
New	Site layout map	Schedule 1 Figure 2	Site layout map

## References

1. Cockburn Cement Limited 2014, Dongara Lime Plant Licence L729/1995/9, Perth, Western Australia.
2. Cockburn Cement Limited 2022, *Application and supporting documents*, Perth, Western Australia.
3. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

## Appendix 1: Summary of licence holder's comments on risk assessment and draft conditions

Condition	Summary of licence holder's comment	Department's response
<b>Comments submitted 10 March 2023</b>		
Condition 1 Table 1 Item 1	The licence holder advised that all gases from lime manufacturing pass through two baghouses filters, the cooler baghouse and preheater baghouse.	The department notes this information and has updated the condition to reflect this
Condition 1 Table 1 Item 2	Cooler baghouse gases go to the cooling stack (A2) and preheater baghouse gases are directed to the kiln stack (A1).	The department notes this information and has updated the condition to reflect this
Condition 1 Table 1 Item 8	<p>Licence holder requested the following:</p> <ul style="list-style-type: none"> <li>• All individual sandpits are removed and referred to as a collective and there are more than 2 sandpits that the screens will be used within.</li> <li>• Tarpaulins are no longer used any more, as water is added to material to reduce dust.</li> <li>• That sandpits will have either watercart or fixed sprayers/sprinklers, but not both, as water is not available to fit sprinklers in all sandpits.</li> <li>• Remove reference to molasses for blending for Aglime and remove reference to storage of Aglime in sandpit 4.</li> <li>• Remove all reference to where screened sand lime is stockpiled, the heights of the stockpile as this is managed by DMIRS</li> </ul>	<p>The department notes this information and provides the following information.</p> <ul style="list-style-type: none"> <li>• Sandpits that have been assessed for screening activities will be labelled to define assessed and unassessed areas within the premises.</li> <li>• The use of no tarpaulins on internal roads and moisture content management of lime sand has been updated in the assessment.</li> <li>• The department has updated this information in the assessment.</li> <li>• The department has risk assessed and considers molasses assists in dust suppression and has only assessed stored in sandpit 4.</li> <li>• The department has risk assessed considering the heights of the stockpiles and where a product is stored and these licence holder controls have been deemed essential for dust emissions.</li> </ul>
Condition 1 Table 1 Item 10	Remove screens being limited to sandpit 3 and 4 as the screens are mobile and can operate in other areas of the mining lease M70/311.	The department assessed the risk, based on information supplied within the licence holder's application and supporting documents. Another application will be required to be submitted for screening operations over the entire mining lease.
Condition	Summary of licence holder's comment	Department's response
<b>Comments submitted 10 April 2023</b>		
Amendment report Section 2.1.1	The licence holder requested that all mobile screening plant equipment be referred to generically and not specifically named for the make and model, so as not to create technical breaches within the licence.	The department has described the details that were provided by the licence holder within their application. Listing the specific make and model of the screening equipment within the Amendment Report will not create technical licence breaches.

Condition	Summary of licence holder's comment	Department's response
		The department will update amended licence Condition 1 Table 1 Item 7 as generic mobile screening plants.
Amendment report Section 2.2.2	The licence holder submitted details demonstrating that the AER and AACR for 1 January 2021 to 31 December 2021 were submitted on time and were compliant with the licence.	The department notes this information and has updated the section to reflect this.
Amendment report Table 2 Licence holder controls	The licence holder requested that the stockpile heights for sandpits 3 and 4 are removed as they are reflective of the existing stockpile heights (not the maximum) and requested it to be changed to below the sandpit wall height. The stockpiles are shielded by the sandpit wall height.	The department notes this information and has updated Tables 2 and 4. The department has considered this change in its risk assessment and determined to change Condition 1 Item 7 to "maximum height of lime sand stockpiles in sandpits 2, 3 and 4 must be no greater than 2 metres below the lowest sandpit wall height respectively for each pit.
Amendment report Table 4	The licence holder requested that the dust control measure for sandpit 2 (which is currently not operational) reflect that the stockpile height be maintained below the sandpit wall height.	
Amended licence Page 1	The licence holder requested that the production capacity for category 43 is changed to more than 100,000 tonnes of lime manufactured per annual period. This request is based on that the provision for an increase no greater than 10% of the nominal rated throughput (NRM) present in the current licence has been removed. The NRM is based on kiln reliability, removal of this provision represents a material change and tightening of the licence restrictions that will have significant operational and commercial implications.	The existing and revised amended licence both have an assessed production capacity for category 43 as no more than 100,000 tonnes of lime manufactured per annual period. No changes have been made to the throughput within the licence amendment. If the licence holder requests to manufacture greater than 100,000 tonnes of lime per year a new licence amendment application should be submitted where it can be risk assessed. Furthermore, the existing 10% NRM was not a condition but part of the existing licence preamble. The department has removed preambles from licences to improve the readability for compliance with licences.
Amended licence Condition 1 Table 1- Infrastructure and equipment requirements. Item 3 (a)	The licence holder requests that the storage containers be stored in a fit-for-purpose container, suitable for the class of chemicals to be contained, and have the low permeability removed as it is not an applicable measure for storage containers.	Item 3 (a) was not assessed but updated to the latest format from existing condition W1(a). W1 (a) requires hazardous chemicals and hydrocarbons to be stored with low permeability (10 <sup>-9</sup> ) metres per second. The licence holder can submit a future licence amendment to revise storage container requirements.
Amended licence Condition 1 Table 1- Infrastructure and equipment requirements. Item 7 (i)	The licence holder requests that lime sand stockpiles must be tested for moisture content within a 24-hour period and have a moisture content greater than 2% average, (changed from 5-10 %). This will allow for seasonal variations and testing of stockpiles to occur only when mining operations occur.	The department notes this information and has updated the licence condition.
Amended licence Table 3	Discharge point heights from emission points have been wrongly assigned. A1 stack is 65 mabgl and A2 stack is 22 mabgl	The department notes this information and has updated the licence condition.