



## Application for Works Approval

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

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**Works Approval Number** W6954/2024/1

**Applicant** Rebus (WA) PTY LTD

**ACN** 631 176 219

**File number** DER2024/000297

**Premises** 5495 Borden Bremer Bay Road

Legal description

Lot 1566 Bremer Bay Road

**Date of report** 10 May 2025

**Decision** Works approval granted

**Caron Goodbourn**

**MANAGER, PROCESS INDUSTRIES**

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

# 1. Scope of assessment

## 1.1 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>.

## 1.2 Application summary

Rebus (WA) Pty Ltd submitted an application on 21 June 2024 for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act). The application submitted seeks approval to construct and operate a mobile concrete batching plant, which is a prescribed premise under category 77: Concrete batching and cement manufacturing. The design capacity of the plant is 135,200 tonnes per year, with an expected output of 4,800 tonnes.

The premises is located on a rural property at 5495 Borden Bremer Bay Road, which is located approximately 13km West of the Bremer bay townsite. The applicant proposes to operate the premises between 5am to 5pm Monday to Friday and 5am to 12pm Saturday.

Key infrastructure and equipment to be constructed and operated on the premises for the purpose of concrete batching are as follows:

- Aggregate Bunker
- 2 x 23kL water supply tanks
- Generator
- Aggregate weigh hopper
- Gob Hopper
- Bunded admixture storage
- Semi 42 CBM cement silo
- Washout Bay
- Catchment dam
- Service shelter

## 1.3 Other relevant approvals

The applicant gained planning approval from the Shire of Jerramungup on 27 May 2025.

## 1.4 Compliance with the Concrete Batching Regulations.

The applicant advised that the premises will be established in accordance with the requirements of the *Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998* (the Regulations). A summary of the applicant's proposed design and operational controls relating to these requirements is included in Table 1. The delegated officer reviewed the proposed controls and determined the concrete batching operation is capable of complying with the Regulations.

**Table 1: Applicant controls compared to the Regulations.**

Concrete Batching Regulations	Applicant Proposed controls (from application)
Regulation 3: Minimisation of dust	Spray Bars mounted on gob hopper Sprinklers on aggregate stockpiles Sprinklers in general yard Mobile plant (loader) available to assist in any spill Any spillage to be recycled if possible or disposed of to a designated storage facility. Daily housekeeping of work area to occur Workplace inspections to be conducted
Regulation 4: Control of dust from trafficable areas	Regular spray control from sprinklers to be utilised Designated washdown area is to be constructed. All concrete truck drivers to be inducted to ensure knowledge and compliance with washdown procedures.
Regulation 5: Storage of aggregate and sand	Aggregate bunkers are to be used to store all aggregates and sand. Sprinklers installed on bunkers and around the yard Operators inducted to company's dust control procedures Workplace inspections to be conducted to ensure height is acceptable.
Regulation 6: Storage of cement	Cement Silo on site for storage. Operators inducted in dust control measures when filling silo. Silo supplied by Sami EuroSilo De, with air cleaning system and relief valve inbuilt. All openings on silo are sealed.
Regulation 7: Air cleaning system for cement storage silo	Silo features a reverse pulse air cleaning system and any discharges from silo are discharged into a waste pod. Workplace/plant tests, checks and inspections to be conducted. Spare filters are to be stored on site.
Regulation 8: Level indicator system or relief valve for cement storage silo	Relief valves inbuilt into silo system. Cement storage silo has load cells and displays the 'live weight' of cement during loading. Operator is trained and inducted in unloading procedures, which includes visually monitoring the load cell to ensure system is not overloaded. The capacity of the cement storage silo is 56 tonnes. Delivery sizes of cement are capped at 40 tonnes, and are scheduled after silo stock level drops below 16 tonnes to ensure overloading cannot occur.
Regulation 9: Movement of materials on premises and loading of agitators	Variety of dust minimisation techniques on equipment including spray bars on gob Hopper, conveyors fitted with windshields, chute and bucket elevator fitted with windshields, hungry boards around aggregate bin, sprinklers on aggregate stock piles and sprinklers around the yard to minimize dust movement.
Regulation 10: Cement product manufacturing premises to be cleaned	Daily housekeeping. Regular workplace inspections to maintain equipment. All electrical installations are waterproof.
Regulation 11: Control of waste water	Concrete silt trap will be designed and constructed to capture overflow from the truck wash down bay and contaminated stormwater and sediment from batching area. An existing catchment dam has been repurposed to capture stormwater and sediment from across entire premises. Contours have been arranged to ensure that the entirety of the premises drains to the catchment dam. Regular workplace inspections to be conducted. Hydrocarbon release risk is low given the anticipated volume of use the site will receive.
Regulation 12: Slurry pits, settling ponds, silt traps and oil interceptors	Regular workplace inspections to be conducted to ensure compliance.
Regulation 13: Disposal of waste	Waste material is to be cleaned up and re-used if possible or disposed of at an approved licenced facility.

## 2. 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.

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 2 below provides a summary of the closest human and environmental receptors from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)). The delegated officer concludes that the premises is remote, and apart from neighboring surface water dams, the distance between the premise and sensitive receptors would have little impacts on the receptors.

**Table 2: Sensitive human and environmental receptors and distance from prescribed activity**

Human receptors	Distance from concrete batching plant
2 Residential premises	3.1 km North 3.5km South
Bush camp	4.5km North-West
Environmental receptors	Distance from concrete batching plant
Surface Water dams on neighboring properties	630m East, 1.95km North, 2.1km West
Lake Torrup	3.2km West of proposed construction site
Bremer River	6km North-East

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and considers potential source-pathway and receptor linkages.

Where the applicant has proposed mitigation measures/controls, 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.

**Table 3: Risk assessment of potential emissions and discharges from the premises during construction and operation**

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Delegated Officer Comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls			
Operation of batching plant, mobile equipment, and vehicles	Dust	Air / windborne pathway causing impacts to amenity	Closest residences are 3.1km North of the premises.	Refer to Table 1 (Regulations 3,4,5,6)	C =Slight, low level impact to amenity L = Unlikely, will probably not occur in most circumstances <b>Low Risk</b>	Y	The delegated officer considers that the separation distance to the closest residential receptor is sufficiently large that dust emissions associated with construction of the premises are unlikely to impact the amenity of those receptors.  The delegated officer considered the applicant's proposed controls are likely to comply with the relevant requirements of the Concrete Batching Regulations.
	Noise			Large distance to any nearby sensitive receptors.  Plant operation hours between 5am and 5pm.		Y	
Chemical (admixture) storage	Chemicals or contaminated water	Direct discharge to ground and infiltration to groundwater or overland flow potential resulting in contamination	Groundwater	Refer to Table 1 (Regulations 11, 12,13)	C = Minor, low level onsite impact and minimal offsite impact L = Rare, will probably not occur in most circumstances <b>Low Risk</b>	Y	The delegated officer considers the applicant proposed suitable containment for chemicals. To ensure the risk remains low condition 1 of the works approval requires construction of containment infrastructure as proposed by the applicant.

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

### 3. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

**Table 4: Consultation**

Consultation method	Comments received
Application advertised on the department's website on 4/9/2024	None received
Shire of Jerramungup was advised via email of the proposal on 16/9/2024	None received
Applicant was provided with draft works approval and decision report on 28/1/2025	Requested the Works Approval as per draft be issued.

### 4. Decision

The proposed batching plant construction was assessed for compliance against the *Environmental Protection (Concrete Batching and Cement Products Manufacturing) Regulations 1998* which apply to the construction and operational aspects of the premises.

As a result of this assessment, works approval W6954/2024/1 is **to be granted** for a period of 3 years from the date of approval.

In granting this works approval, the delegated officer has determined the proposal does not pose and unacceptable risk of impact to public health or the environment. This determination is based on:

- the location of the concrete batching being on a rural property, with sufficient separation distance to public receptors;
- the applicant's operation of the premises being during daytime hours, and
- the applicant's proposed design and operation controls being expected to comply with the Regulations;
- the applicant being required to operate the premises in a manner which complies with the Regulations, the *Environmental Protection (Noise) Regulations 1997* and the *Environmental Protection (Unauthorised Discharges) Regulations 2004*.

Works approval W6954/2024/1 that accompanies this decision report only authorises the construction of the premises. When construction works are complete, the applicant is required to demonstrate compliance with the specified design and construction requirements through the submission of a compliance audit report. Upon submission of this report the applicant may apply for Registration of the premises under Regulation 5A of the *Environmental Protection Regulations 1987*. A Registration is required following construction to authorise emissions associated with the ongoing operation of the premises.

### References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. *Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline:*

*Environmental Siting*, Perth, Western Australia.

4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
5. Environmental Protection Authority, 2005, *Guidance for the Assessment of Environmental Factors Western Australia* (in accordance with the Environmental Protection Act 1986) - Separation Distances between Industrial and Sensitive Land Uses, Western Australia.
6. *Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations*, Western Australia
7. *Environmental Protection (Noise) Regulations 1997*, Western Australia
8. Rebus (WA) Pty Ltd, 2024, *Application for a works approval and supporting documents*, Perth, Western Australia