



Manager Process Industries
 Industry Regulation
 Department of Water and Environmental Protection
 Locked Bag 10
 Joondalup DC WA 6919

RE: DWER WORKS APPROVAL – 5495 BORDEN BREMER BAY ROAD BREMER BAY

To whom it may concern

Please find response to letter, dated 17th July 2024, in response to works approval application for the construction of a concrete batching plant at 5495 Borden Bremer Bay Road, Bremer Bay.

Please find supporting information set out in schedule 1 of DWER works approval letter.

Table 1: Supporting information

| Relevant part of application form | Information requirement (DWER) | Cast-tech response |
|---|--|---|
| 3.4 | Updated site map showing all infrastructure involved in producing and storing concrete i.e. cement silo's, concrete storage bunker, silt traps | Refer updated site map (Attachment 2 - Site map v2) |
| 4.1 | All infrastructure that is involved in producing or storing concrete on the site. | Refer updated site map (Attachment 2 - Site map v2) |
| Part 4.2 Construction and operational activities | Provide a consolidated summary (e.g. table) to demonstrate how the proposed design, control and management will comply with all relevant requirements of the Environmental Protection (Concrete Batching and Cement Product Manufacturing) Regulations 1998 (Concrete Batching Regulations). | Refer Table 2 below for further information. |
| 4.8 | Confirmation of maximum production capacity per year in tonnage (based on operating 24 hours a day, 7 days a week). Confirmation of estimated actual production per year in tonnage. Provide figures on how the estimated production per year was reached. | Estimated output: 4,800t per year (2000m3 per year) Capacity of plant: 135,200t per year |
| 7.5 | Provide evidence of planning approvals from the Shire of Jerramungup. If you believe you do not require planning approval, please provide the reasons why. | Approach has been made to the Jerramungup Shire council to initiate the process of gaining planning approval. We have engaged the services of a planner consultant to assist with gaining planning approval. As above- this is in progress, and will likely extend well into the second half of 2025. |

Table 2: Compliance to Environmental Protection (Concrete batching and cement product manufacturing) Regulations 1998

| Section | Specific requirement | Cast-tech response |
|--|--|---|
| 3. Minimisation of dust | (1) No visible dust to escape premises | <p>Cast-tech have a variety of dust minimisation techniques including:</p> <ul style="list-style-type: none"> • Spray bars mounted to gob hopper. • Dust control sprinklers on aggregate stockpiles. • Regular spray control i.e. dust control sprinklers in the yard. <p>Regular workplace inspections shall be conducted to ensure compliance to regulatory requirements including general dust in work areas.</p> |
| | (2) Clean up any material spilt during concrete batching | <p>Cast-tech have access to a variety of mobile plant (loader) to assist with clean-up activities. Any spilt material will be cleaned up and re-used where possible and if not disposed of to a designated storage facility.</p> <p>Daily housekeeping of work area.</p> <p>Regular workplace inspections shall be conducted to ensure compliance to regulatory requirements including spilt materials.</p> |
| 4. Control of dust from trafficable areas | (1) Premises to be paved/ sealed or treated with water/ surfactants and kept clear of loose aggregate, sand, cement, concrete, or other material to prevent loose material adhering to vehicles and to minimise dust | <p>Regular spray control i.e. dust control sprinklers in the yard.</p> <p>Daily housekeeping of work area.</p> <p>Regular workplace inspections shall be conducted to ensure compliance to regulatory requirements including general dust in work areas.</p> |
| | (2) Vehicles carrying cement shall not leave premises until washed free of cement slurry and dust | <p>A designated wash-down area shall be constructed and all concrete truck drivers shall be inducted to ensure knowledge and compliance with Cast-tech wash-down procedures.</p> |
| 5. Storage of aggregate and sand | (1) Aggregate and sand to be kept in storage bins/ bays to minimise airborne dust | <p>Aggregate bunkers shall be used to store aggregates and sand.</p> |

| | | |
|-----------------------------|---|--|
| | | <p>Dust control sprinklers to be installed on aggregate stockpiles.</p> <p>Regular workplace inspections shall be conducted to ensure compliance to regulatory requirements including general dust in work areas.</p> |
| | (2) Height of aggregate shall not exceed height of the bin/ bay | <p>Aggregate bunkers shall be used to store aggregates and sand.</p> <p>Regular workplace inspections to be carried out to ensure compliance to regulatory requirements including height of materials being stored in bunkers.</p> |
| | (3) Aggregate storage in stockpile | N/A (Cast-tech shall use aggregate bunkers not stockpile) |
| | (4) Minimise dust during unloading activities | <p>Spray control i.e. dust control sprinklers in the aggregate stockpiles and yards shall be employed as required.</p> <p>Operators shall be inducted to ensure knowledge and compliance with Cast-tech dust control procedures.</p> <p>Regular workplace inspections to be carried out to ensure compliance to regulatory requirements including height of materials being stored in bunkers.</p> |
| 5. Storage of cement | (1) Cement shall be kept in bags or cement storage silo | Cement is pumped directly from a tanker to the cement storage silo. |
| | (2) Cement storage silo to be fitted with an air-cleaning system (compliant to regulation 7) with a level indicator or relief valve | Cement storage silo is a manufacturer supplied SAMI EUROSILLO DE. This model has an air cleaning system with an inbuilt relief valve. |
| | (3) All inspection ports, hatches, and other openings in cement storage silo to be sealed | Cement storage silo is a manufacturer supplied SAMI EUROSILLO DE with all openings sealed as per manufacturer specifications. |
| | (4) Minimise dust during filling of cement storage silo | <p>Operators shall be inducted to ensure knowledge and compliance with Cast-tech dust control procedures.</p> <p>Regular workplace inspections to be carried out to ensure compliance to regulatory</p> |

| | | |
|--|---|--|
| | | requirements including dust minimisation. |
| 7. Air cleaning system for cement storage silo | (1) The air cleaning system must be either a mechanical wrapping air cleaning system or reverse pulse air cleaning system and discharge air from the system into a weigh hopper | Cement storage silo is a manufacturer supplied SAMI EUROSILLO DE. This model features a reverse pulse air cleaning system and any discharges are discharged into a waste pod. |
| | (2) Operator must inspect the filters or if the system is fitted with pressure gauges, must check gauges at least weekly and clean, repair or replace filter. | Regular workplace and plant inspections shall be conducted to ensure compliance to regulatory requirements. |
| | (3) Test the air cleaning system for a cement storage silo at least weekly and not unload any cement until repaired. | Regular workplace and plant inspections shall be conducted to ensure compliance to regulatory requirements. |
| | (4) Must keep readily available spare filters | Spare filters are kept in stock on the premises. |
| 8. Level indicator system or relief valve for cement storage silo | (1) A level indicator system to be installed on cement storage silo and include an audible alarm and a test circuit. | The cement storage silo has load cells and therefore the 'live weight' of cement is displayed during loading. Operator is trained/ inducted in unloading procedures which includes visually monitoring the load cells to ensure system is not overloaded. The capacity of the cement storage silo is 56T. Delivery sizes are capped at 40t, and are scheduled after silo stock level drops below 16t to ensure overloading does not occur. |
| | (2) Where level indicator is used a test circuit shall be activated before a load of cement is unloaded. | N/A |
| | (3) Where relief valve is used it must be designed to automatically prevent the level of cement rising above level and any excess cement is piped into a weigh hopper | Cement storage silo is a manufacturer supplied SAMI EUROSILLO DE. This model is fitted with a relief valve and any discharges are discharged into a waste pod. |
| 9. Movement of materials on premises and loading of agitators | (1) All hoppers, chute, bucket elevator or transfer point to load agitators to be enclosed or fitted with wind shields to prevent escape of any visible dust. | Cast-tech have a variety of dust minimisation techniques on equipment including: windshields mounted to gob hopper. |

| | | |
|--|--|---|
| | (2) All wind shields, water sprays, dust extraction systems to maintained in good working order. | Regular workplace inspections shall be conducted to ensure compliance to regulatory requirements including equipment integrity and general dust in work areas. |
| 10. Cement product manufacturing premises to be cleaned | (1) Regularly clean all inside areas on the premises to prevent accumulation of dust. | Daily housekeeping of work area. Regular workplace and plant inspections shall be conducted to ensure compliance to regulatory requirements including general dust in work areas. |
| | (2) Must not use water to carry out any cleaning activities unless all fittings and electrical installations are waterproof or designed to withstand water. | All electrical installations are waterproof. |
| | (3) Subregulation above does not apply to buildings where cement product manufacturing carried out before regulations came into effect | N/A |
| 11. Control of waste water | (1) All water draining off area where agitators, mixers or moulds are loaded or where concrete is batched, all water used to wash out agitators, mixers or moulds or to clean up spilt material drains, all other water draining off sealed or paved areas on the premises into a slurry pit or any water removed from or which might overflow from a slurry into a settling pond. | A 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 shall be conducted to ensure compliance to regulatory requirements including waste water management. |
| | (2) All water used in concrete batching or cement product manufacturing is to be discharged into the silt trap or settling pond and if likely to contain hydrocarbons it has been through an oil separator. | A silt trap will be designed and built to capture overflow from the truck wash down bay and contaminated stormwater and sediment from batching area. catchment dam captures stormwater and sediment from across entire premises. |

| | | |
|---|---|---|
| | | The risk of water containing hydrocarbons has been assessed as low, given the anticipated volume of use the site will receive. |
| 12. Slurry pits, settling ponds, silt traps and oil interceptors | (1) The slurry pit shall not dry out or be higher than 30cm below the top of the slurry pit wall, and be large enough to contain all water and allow particulate matter to settle out and be maintained, emptied, or cleaned as often as necessary to ensure efficient operation. | Regular workplace inspections shall be conducted to ensure compliance to regulatory requirements including waste water management. |
| 13. Disposal of waste | All waste created during concrete batching or cement product manufacturing from slurry pits, settling ponds, silt traps is recycled or disposed of at an appropriate landfill site. | Cast-tech have access to a variety of mobile plant (loader) to assist with clean-up activities. Any spilt material will be cleaned up and re-used where possible and if not disposed of to a designated storage facility. |

I hope you find this letter provides sufficient details to satisfy compliance with DWER requirements. If you require any further information, please call or email.

Thankyou



Director

Cast-Tech Group