Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Works Approval Amendment

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

Works Approval Number	W6427/2020/1
Works Approval Holder	Fremantle Port Authority
File Number	DER2020/000324~3
Premises	Kwinana Bult Terminal 1 Riseley Road NAVAL BASE WA 6165 Legal description – Lot 452 on Deposited Plan 220690, Part of Lot 11 on Deposited Plan 39572 and Lot A within Lot 251 and Lot C within Lot 250 on Deposited Plan 415974
Date of Report	12 September 2024
Decision	Revised works approval granted

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1. Decision summary

Works Approval W6427/2020/1 is held by Fremantle Port Authority (Works Approval Holder) for the Kwinana Bulk Terminal (the Premises).

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 Works Approval W6427/2020/1 has been granted.

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 and overview of premises

On 10 June 2024, the Works Approval Holder submitted an application to the department to amend Works Approval W6427/2020/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- To include commissioning of the Cement Clinker Import Circuit infrastructure; and
- To include time-limited operation (TLO) conditions to the Works Approval.

The cement clinker import circuit is being constructed to replace aging infrastructure and provide a modern facility to import bulk granular material including cement clinker and granulated slag at the premises. The import circuit will be used to unload approximately 50% of the imported cement clinker and granulated slag directly to the adjacent Cockburn Cement (CCL) facility by conveyor, with the remainder being loaded into trucks for transport off-site to a BGC facility.

2.2.1 Overview of operations

Cement clinker will be unloaded via an existing ship unloader and transported along existing conveyors from the JC01 conveyor via transfer tower T1 to IC01 conveyor (to be renamed IC01A). The product will be transported from IC01A to the infrastructure listed on W6427/2020/1 in the following sequence: Transfer tower T12 (IC01A/CC01), CC01 conveyor, transfer tower T14 (CC01/CC02/CC04) and transported by CC02 conveyor to the import storage dome or alternatively transported by CC04 conveyor to the CCL transfer tower (located within the CCL lease area). Cement clinker will be transported from CCL transfer tower to CCL's conveyor into CCL's adjacent prescribed premises.

The cement clinker stored in the import storage dome (40,000 tonnes capacity) will be reclaimed using the CC03 conveyor and transported to the truck load-out facility. The import storage dome has a series of reclaim chutes along the centerline for gravity reclaim that feed CC03 conveyor. Front end loaders will be used in the import storage dome to recover the remaining product into the chutes after gravity drawdown, when required (i.e. changing from grey to white cement clinker). At the truck loadout facility, cement clinker will be temporarily stored in a hopper (200 tonnes capacity) and be loaded into trucks using three telescopic discharge chutes with loading controlled by a weighbridge.

CCL's granulated slag imports will follow the same process flow as described for cement clinker, except that it will bypass the import storage dome and be transported along CC04 to

the CCL transfer station in CCL's leased area. Granulated slag imported for BCG will follow the existing import circuit route and be stored in the existing granulated slag stockpile.

2.2.2 Proposed environmental commissioning

The proposed commissioning works will take place in three stages:

- Pre-commissioning, where the works will be systematically assessed for completeness and readiness to be dry commissioned during the construction phase. Pre-commissioning is conducted in parallel to construction (where possible) to reduce the duration required to complete the final wet commissioning stage. All infrastructure noted in the Works Approval must be pre-commissioned.
- Dry commissioning, where electrical power is connected, and preliminary functional checks of individual items of equipment are completed during the construction phase with no bulk material flow. The objective is to conduct this stage in parallel to construction (where possible) to reduce the duration required to complete the final wet commissioning stage. Actions will relate to functional checks of all dust collection units for operation and airflow. All infrastructure noted in the Works Approval must be dry commissioned.
- The wet commissioning stage involves testing the full operation of all equipment and control systems under various conditions and modes of operation. The control systems are run through all their sequence of operation and the response of the components recorded and verified. Wet commissioning extends from components to sub systems to systems and finally to interlocks and connections between systems.

Wet commissioning will see the introduction of cement clinker and granulated slag to the works and is proposed to include the complete unloading of at least two full ships of product for each of the two customers; CCL and BGC (four ships). Typically, this will be a minimum of 60,000 tonnes for each customer from two ships. All infrastructure noted in the Works Approval is to be wet commissioned.

Following a review of the proposed commissioning works, the Delegated Officer has determined that the proposed wet commissioning works do not meet the department's definition of 'environmental commissioning' given there will be no optimising (and validating) of any process or emission source to demonstrate that it meets predicted emissions. Rather, the proposed wet commissioning is intended to test all systems and components of the plant and equipment have been built and installed correctly and are operational according to the specifications of the plant or equipment. This is considered to be standard engineering commissioning.

Further, given the wet commissioning requires the handling, transport and loading of cement clinker and granulated slag, the process is considered to be standard operation and therefore will be regulated under time-limited operations.

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 2020a).

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 operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Works Approval Holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Works Approval Holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Product movement through transfer and conveyors (cement clinker, granulated slag) Product handling at truck load out station and import storage shed (cement clinker, granulated slag)	Air/windborne pathway	Sweeper truck to remove dust, spilt and accumulated material from all trafficable areas within the prescribed premises. Water cart onsite and operational to wet all trafficable areas within the prescribed premises. Long distance of operations from the nearest sensitive receptors. Inspected by on-site personnel. Total suspended particles (TSP) boundary dust monitoring network and reporting in accordance with licence L4476/1984/12. Real-time dust alarms on TSP boundary dust monitors in accordance with licence L4476/1984/12. Reportable event criteria of <260ug/m3 /day on licence L4476/1984/12. Construction Environmental Management Plan to be provided by contractor and approved by Fremantle Ports prior to works commencing. Product will be loaded using a weighbridge reducing spillage due to overloading. Pre-commissioning and Dry commissioning phases complete. Wet commissioning actions to be completed. Adequate moisture content of granulated slag on arrival to berth (4-6%) reducing potential for dust lift off from product.
Noise	Product loading and transfer	Air/windborne pathway	Long distance of operations from sensitive receptor Incident, hazards and complaints management program. OHS noise limits and personnel noise monitoring program.
Surface water	Contaminated	Direct	Site stormwater drainage network (no

Emission	Sources	Potential pathways	Proposed controls
runoff	stormwater	discharge	discharge to Cockburn Sound). Stormwater drainage network inspected by site personnel. Incident, hazards and complaints system.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020a), the Delegated Officer has excluded employees, visitors and contractors of the Works Approval 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 2 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 2020b)).

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

Human receptors	Distance from prescribed activity
Closest residential receptor	3,130 m to the south-east
Closest industrial receptor	600 m to the north-east
Environmental receptors	**Distance from prescribed activity**
Cockburn Sound (marine waters)	Within and directly adjacent to the premises
Groundwater area proclaimed under *Rights in Water Irrigation Act 1914*	Lies within and surrounded by Cockburn Groundwater Area. Groundwater monitoring (2007) resulted in *Contaminated site – restrictive us classification.*

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020a) 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 Works Approval 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 Works Approval Holder'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 Works Approval Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Works Approval W6427/2020/1 that accompanies this Amendment Report authorises construction and time-limited operations. The conditions in the Revised Works Approval have been determined in accordance with *Guidance Statement: Setting Conditions*

(DER 2015).

A licence amendment is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the Premises i.e. bulk materials loading and unloading activities. A risk assessment for the operational phase has been included in this Amendment Report, however licence conditions will not be finalised until the department assesses the licence amendment application.

Table 3. Risk assessment of potential emissions and discharges from the premises during operations

Risk Event					Risk rating[1] C = consequence L = likelihood	Works Approval Holder's controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Works Approval Holder's controls**				
Time-limited-operations (including proposed wet commissioning operations)								
Product movement through transfer and conveyors (cement clinker and granulated slag) Product handling at truck load-out station, storage shed (cement clinked, granulated slag) Truck movements	Dust	Air/windborne pathway causing impacts to health and amenity	Residences about 3 km from premises	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Condition 6 - Time limited operations requirements Condition 7, 8 - Time limited operations compliance reporting	N/A The Delegated Officer is satisfied the proposed controls, in addition to existing controls on licence L4476/1984/12, are sufficient to mitigate the risk to an acceptable level during time limited operations. As such, no additional controls have been specified on the amended works approval.
	Noise			Refer to Section 3.1	C = Minor L = Rare **Low Risk**	Y	N/A	N/A The Delegated Officer considers the risk to be low due to the separation distance to sensitive receptors and notes that the *Environmental Protection (Noise) Regulations 1997* are sufficient to mitigate potential impacts to the industrial office about 600 m from the proposed activity. No noise controls have been specified in the amended works approval.

Risk Event					Risk rating[1] C = consequence L = likelihood	Works Approval Holder's controls sufficient?	Conditions[2] of works approval	Justification for additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Works Approval Holder's controls**				
	Contaminated stormwater runoff	Direct discharge to Cockburn Sound resulting in adverse impacts on water quality and marine ecology	Cockburn Sound waters and marine environment	Refer to Section 3.1	C = Minor L = Unlikely **Low Risk**	Y	Condition 6 - Time limited operations requirements Condition 7, 8 - Time limited operations compliance reporting	N/A The Delegated Officer is satisfied the proposed controls, in addition to existing controls on licence L4476/1984/12, are sufficient to mitigate the risk to an acceptable level during time limited operations. As such, no additional controls have been specified on the amended works approval.

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

Note 2: Proposed Works Approval Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

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

Table 4: Consultation

Consultation method	Comments received	Department response
Works Approval Holder was provided with draft amendment on 5 August 2024	Refer to Appendix 1	Refer to Appendix 1

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Works Approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Works Approval as part of the amendment process.

Table 5: Summary of works approval amendments

Condition no.	Proposed amendments
4 - 8	Time limited operations conditions have been added to allow time limited operations for up to 180 calendar days.
Definitions	Definitions have been added for ‘time limited operations’

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020a, *Guideline: Risk Assessments*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020b, *Guideline: Environmental Siting*, Perth, Western Australia.
4. Fremantle Ports (2024), *Application for Works Approval Amendment – Cement Clinker Import Circuit W6427/2020/1*, Fremantle Western Australia

Appendix 1: Summary of Works Approval Holder's comments on risk assessment and draft conditions

Condition	Summary of Works Approval Holder's comment	Department's response
Works Approval History Summary of Changes	The summary of changes notes 'Amendment to include commissioning and time limited operations conditions' however as noted in the Draft Amendment Report the proposed wet commissioning works do not meet the department's definition of 'environmental commissioning' and will be regulated under time-limited operations. Fremantle Ports, therefore, requests that the summary of changes be updated to remove reference to commissioning in the summary.	Change accepted.
Condition 4	Fremantle Ports requests that Condition 4 is updated to refer to 'condition 1' (replacing Condition 6) and 'Environmental Compliance Report' (replacing Environmental Construction Report) as follows: *'The works approval holder may only commence time limited operations for an item of infrastructure identified in condition 1, where the Environmental Compliance Report for that item of infrastructure as required by conditions 2 and 3 has been submitted by the works approval holder'.*	Reference to incorrect condition number has now been corrected.
Condition 6, Table 2, Row 1, Operational requirement a)	Fremantle Ports notes the following operational requirement 'a) *Ensure transfer station is always enclosed*' is already a design and construction / installation requirement for this infrastructure item in Table 1, specifically 'Transfer station to be enclosed'. To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: *'a) Transfer station enclosed to contain dust on the conveyor belt transfer points'*	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition.
Condition 6, Table 2, Row 1, Operational requirement b)	Fremantle Ports notes the following operational requirement '*b) maintain the CC01 insertable dust extraction unit'* is already required of Condition 6, specifically '…infrastructure and equipment listed in Table 2 and located at	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no

Condition	Summary of Works Approval Holder's comment	Department's response
	the corresponding infrastructure location is maintained and operated…' To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: *'b) all dust collectors must be on, operating and not full or blocked.'*	change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition
Condition 6, Table 2, Row 1, Operational requirement d)	Fremantle Ports notes the following operational requirement 'd) *Keep an operational water cart on-site to wet all trafficable areas'*; is a design and construction / installation requirement for this infrastructure item, refer Table 1. Fremantle Ports requests that this operational requirement is removed from Table 2 as it is not required at Transfer Station T12 on completion of construction as areas will be sealed and not disturbed, and any site traffic will utilise existing road networks managed under the site environmental licence L4476/1984/12 (noting a water truck is equipment specified in Schedule 3 of the licence).	The Delegated Officer accepts the reasoning from Fremantle Ports that Transfer Station T12 does not require a water cart and as such, this requirement has been removed.
Condition 6, Table 2, Row 2, Operational requirement f)	Fremantle Ports notes the following operational requirement 'f) *Maintain installed all-weather top wind shields'* is already required of Condition 6, specifically '…infrastructure location is maintained and operated…' To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: '*f) Wind shields contain dust on the conveyor.'*	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition.
Condition 6, Table 2, Row 2, Operational requirement g)	Fremantle Ports notes the following operational requirement 'g) *Check installation for indications of carry back'* is already required of Condition 6, specifically *'…infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location is maintained…'* Fremantle Ports considers this operational requirement is too prescriptive and requests that this operational requirement is removed from Table 2.	This requirement has come from the Fremantle Port supporting document, specifically *Table 9: Specific Actions during Wet Commissioning.* The Delegated Officer has considered whether the requirement is necessary in TLO and has concluded that Fremantle Port controls, particularly the use of sweeper trucks for spillage, are sufficient and as such, has removed the condition from Table 2.
Condition 6, Table 2, Row 3, Operational requirement h)	Fremantle Ports notes the following operational requirement 'h) *Ensure transfer station is enclosed*' is already a design and construction / installation requirement for this infrastructure item in Table 1, specifically *'Transfer station to be enclosed'.*	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer

Condition	Summary of Works Approval Holder's comment	Department's response
	To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: *'h) Transfer station enclosed to contain the dust on the conveyor belt transfer points'*	accepts the wording change and has updated the condition.
Condition 6, Table 2, Row 3, Operational requirement i)	Fremantle Ports notes the following operational requirement 'i) *Maintain and operate dust collector (fitted with bag filter) that extracts dust from Transfer station, Import storage dome and Truck load out facility'* is already required of Condition 6, specifically '…infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location is maintained and operated…' To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: *'i) All dust collectors must be on, operating and not full or blocked.'*	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition.
Condition 6, Table 2, Row 3, Operational requirement j)	Fremantle Ports notes the following operational requirement '*j) Return collected dust to the system'* is a design and construction / installation requirement for this infrastructure item, refer Table 1. Fremantle Ports will provide evidence that this infrastructure requirement has been met in the Environmental Compliance Report, therefore requests that this operational requirement is removed from Table 2.	The Delegated Officer understands the return of collected dust to the system is a design feature, that should be specified as a construction/installation requirement. As it is integrated into the design of the system, the Delegated Officer will accept the change and remove the requirement from Table 2, with the understanding that Fremantle Ports will return any dust that is captured during TLO.
Condition 6, Table 2, Row 4, Operational requirement k)	Fremantle Ports notes the following operational requirement 'k*) Maintain installed all-weather top wind shields'* is already required of Condition 6, specifically '…infrastructure and equipment listed in Table 2 and located a the corresponding infrastructure location is maintained and operated…' To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: '*k) Wind shields contain dust on the conveyor.'*	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition
Condition 6, Table 2, Row 4, Operational requirement l)	Fremantle Ports notes the following operational requirement 'l) *Check for installation for indications of carry back'* is already required of Condition 6, specifically '…infrastructure and equipment listed in Table 3 and located at	This requirement has come from the Fremantle Port supporting document, specifically *Table 9: Specific Actions during Wet Commissioning.* The Delegated Officer has

Condition	Summary of Works Approval Holder's comment	Department's response
	the corresponding infrastructure location is maintained…;. Fremantle Ports considers this operational requirement too prescriptive and requests that this operational requirement is removed from Table 2.	considered whether the requirement is necessary in TLO and has concluded that Fremantle Port controls, particularly the use of sweeper trucks for spillage, are sufficient and as such, will remove the condition from Table 2.
Condition 6, Table 2, Row 5, Operational requirement m)	Fremantle Ports notes the following operational requirement '*m) Ensure storage dome fully enclosed'* is already a design and construction / installation requirement for this infrastructure item in Table 1, specifically *'Import storage dome fully enclosed with dust collector installed'*. To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: '*m) Import storage dome enclosed to contain dust.*'	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition.
Condition 6, Table 2, Row 5, Operational requirement n)	Fremantle Ports notes the following operational requirement '*n) Maintain dust collector system*' is already a requirement of condition 6, specifically '*…infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location is maintained and operated…*' To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: 'n) *All dust collectors must be on, operating and not full or blocked'*	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition.
Condition 6, Table 2, Row 5, Operational requirement o)	Fremantle Ports notes the following operational requirement 'o) *Return collected dust to the system'* is a design and construction / installation requirements for this infrastructure, refer Table 1. Fremantle Ports will provide evidence that this infrastructure requirement has been met in the Environmental Compliance Report, therefore requests that this operational requirement is removed from Table 2.	The Delegated Officer understands the return of collected dust to the system is a design feature, that should be specified as a construction/installation requirement. As it is integrated into the design of the system, the Delegated Officer will accept the change and remove the requirement from Table 2, with the understanding that Fremantle Ports will return any dust that is captured during TLO.
Condition 6, Table 2, Row 6, Operational requirement p)	Fremantle Ports notes the following operational requirement '*p) Reclaim conveyor located in enclosed import storage dome'* is a design and construction / installation requirement for this infrastructure item, refer Table 1. Fremantle Ports will provide evidence that this infrastructure requirement has been met in the Environmental Compliance Report, therefore requests	The Delegated Officer accepts the reasoning from Fremantle Ports that this is already a design and construction / installation requirement and as such, is happy to remove this from Table 2.

Condition	Summary of Works Approval Holder's comment	Department's response
	that this operational requirement is removed from Table 2.	
Condition 6, Table 2, Row 6, Operational requirement q)	Fremantle Ports notes the following operational requirement '*q) Check for installation for indications of carry back'* is already required of Condition 6, specifically '*…infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location in maintained*…' Fremantle Ports considers this operational requirement too prescriptive and requests that this operational requirement is removed from Table 2.	This requirement has come from the Fremantle Port supporting document, specifically *Table 9: Specific Actions during Wet* Commissioning. The Delegated Officer has considered whether the requirement is necessary in TLO and has concluded that Fremantle Port controls, particularly the use of sweeper trucks for spillage, are sufficient and as such, will remove the condition from Table 2.
Condition 6, Table 2, Row 6, Operational requirement r)	Fremantle Ports notes the following operational requirement 'r*) Ensure truck load out station is enclosed'* is already a design and construction / installation requirement for this infrastructure item in Table 1, specifically 'Truck load out station enclosed.' Fremantle Ports requests that the operational requirement is updated as follows: *'r) Ensure truck load out station doors are closed when trucks are being loaded.'*	The Delegated Officer accepts the updated wording of the condition.
Condition 6, Table 2, Row 7, Operational requirement s)	Fremantle Ports notes the following operational requirement 's*) Maintain installed dust collector with ducted extraction system for the general loading area'* is already required of Condition 6, specifically *'…infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location is maintained and operated…'* To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: '*s) All dust collectors must be on, operating and not full or blocked*.'	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition.
Condition 6, Table 2, Row 8, Operational requirement u)	Fremantle Ports notes the following operational requirement 'u*) Maintain installed all-weather top wind shields'* is already required of Condition 6, specifically *'…infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location is maintained and operated…'* To align with Schedule 3 of the site environmental licence L4476/1984/12 Fremantle Ports requests that the operational requirement is updated as follows: '*u) Wind shields contain dust on the conveyor'.*	The Delegated Officer notes that the change of wording has the same intent as the original wording and aligns with operating conditions in L4476/1984/12, therefore there is no change to risk assessment required. The Delegated Officer accepts the wording change and has updated the condition.

Condition	Summary of Works Approval Holder's comment	Department's response
Condition 6, Table 2, Row 8, Operational requirement v)	Fremantle Ports notes the following operational requirement 'v*) Check for installation for indications of carry back'* is already required of Condition 6, specifically '*…infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location in maintained*…' Fremantle Ports considers this operational requirement too prescriptive and requests that this operational requirement is removed from Table 2.	This requirement has come from the Fremantle Port supporting document, specifically *Table 9: Specific Actions during Wet Commissioning.* The Delegated Officer has considered whether the requirement is necessary in TLO and has concluded that Fremantle Port controls, particularly the use of sweeper trucks for spillage, are sufficient and as such, will remove the condition from Table 2.
Condition 8(c)	Fremantle Ports considers the requirements of Condition 8(c) will be addressed by Condition 8(b), therefore requests that this condition is removed.	Condition 8 is a DWER standard condition regarding compliance reporting of TLO. Condition 8(c) specifically requests the works approval holder to review their performance and compliance against conditions of the works approval, whereas condition 8(b) only requires a summary of environmental performance. The Delegated Officer has determined the condition will therefore remain as is.
Condition 10(b)	Fremantle Ports requests that Condition 10(b) is updated to refer to 'condition 6' (replacing Condition 1) as follows: 'any maintenance of infrastructure that is performed in the course of complying with condition 6'.	The reference to condition 1 has been corrected to reference condition 6.
Amendment Report – Premises Name and address	Fremantle Ports requests that the Premises name and address and updated as follows: 'Kwinana Bulk Terminal, 1 Riseley Road, NAVAL BASE 6165'	Premises name and address updated.
Amendment Report – Section 2.2.2	A spelling error identified in first sentence of the third paragraph. Fremantle Ports requests that the following sentence is updated as follows: *'Following a review of the proposed commissioning works, the Delegated Officer has determined that the proposed wet commissioning works **do** not meet the department's definition of 'environmental commissioning' given there will be no optimising (and validating) of any process or emission source to demonstrate that it meets predicted emissions'*	Spelling corrected.