

2 April 2024



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Via Major Projects Portal

Review and revision of Air Quality Management Plan

Dear Ms Dragicevic,

Hanson wish to notify the Department that review of the Air Quality Management Plan (AQMP), as approved by the Department, has commenced today **02 April 2024**. This notification has been prepared in accordance with *Schedule 5, Condition 5* of Project Approval MP 08_0143:

5. *Within 3 months of:*

(a) *the submission of an annual review under condition 4 above;*

(b) *the submission of an incident report under condition 7 below;*

(c) *the submission of an audit report under condition 9 below; or*

(d) *any modification to this approval (unless the conditions require otherwise),*

the Applicant must review the strategies, plans, and programs required under this approval, to the satisfaction of the Secretary. The Applicant must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary.

Hanson anticipate that the review will lead to revision of the AQMP. This is because in addition to the triggers listed in *Schedule 5, Condition 5* of MP 08_0143, the review and revision of the AQMP is to fulfil EPL-2193 conditions E1.1 and E1.2, which necessitate update to the ambient (real-time) dust monitoring network:

E1 Review and update of ambient dust monitoring network

E1.1 Background

The premises currently monitors ambient dust using two deposition gauges. Deposition gauges are dated and provide limited monitoring data.

Contemporary dust monitoring is real time and informs a trigger action response plan (TARP) which initiates a prompt operational response. This condition requires the licensee to submit a proposal to revise the existing ambient dust monitoring network incorporating contemporary real time monitoring and a TARP.

Aim:

The aim of this condition is to:

- Review and update the existing ambient monitoring network;*
- Incorporate contemporary monitors for dust / particulate monitoring;*
- Compare data against relevant ambient standards and criteria; and*
- Prompt an operational response to elevated levels of ambient dust / particulates.*

E1.2 Requirements

1. *By 5 April 2024 the licensee must nominate a suitably qualified and experienced air quality professional (Professional) to the EPA to undertake this review.*
2. *By 24 May 2024, the licensee must submit a proposal for a revised Air Quality Monitoring System completed by the approved professional to the EPA for review and approval.*

The proposal must incorporate:

- (a) monitoring locations to account for varying wind directions and ensure the effective coverage and assessment of dust emissions from the premises and potential impacts to surrounding areas and receivers (nearby residents),*
- (b) contemporary real-time dust monitoring devices accounting for dust fractions,*
- (c) a comparison against the ambient air quality standard of 50 $\mu\text{g}/\text{m}^3$,*
- (d) trigger levels based on best management practices standards,*
- (e) a trigger action response plan which detects and prompts a specified immediate management response to elevated dust readings,*
- (f) monitoring data reporting, and*
- (g) implementation timeframes.*

Given the substantial overlap between the EPA's requirements and the content required (and already included) in the AQMP, Hanson have opted for a holistic review of the AQMP. Hanson believe that this approach will yield better environmental outcomes as it promotes a congruous air quality network across site. This approach is also logistically simpler, as Departmental approval would be required before making any changes to the approved air quality monitoring network.

The revised AQMP will be submitted to the Department for review in due course. The revised AQMP will not be implemented unless approved by the Department.

Please do not hesitate to contact me if you have any questions.

Warm regards,

HANSON CONSTRUCTION MATERIALS PTY LTD



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