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**EPA Advice on Modification Report – Modification 11 Karuah (East) Pit Consolidation
Project – MP09_0175-Mod-11**

Dear Mr McDonough

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Modification Report for the proposed Karuah (East) Pit Consolidation Project (Application MP09_0175-Mod-11) located 5km northeast of Karuah township adjacent to the Pacific Highway.

The EPA has reviewed the following documents:

- *S4.55(2) Modification Report, Karuah Pit Consolidation Project Modification 11 – (version D) – ADW Johnson – 30 April 2026 and associated appendices*

The EPA understand the proposal is for:

- Concurrently modify both the Karuah East Quarry (KEQ) and Karuah Hard Rock Quarry (KHRQ) consents to extract the known resource contained within already disturbed areas of Lot 11, Lot 12 and Lot 13 and including the dividing highwall, within the currently approved extraction depths of RL45 at KEQ and RL65 at KHRQ.
- Material sourced from the overlapping area of the Consolidated Extraction Area (CEA) will be transported by internal haul road to either the KEQ or KHRQ for processing and stockpiling.
- A minor extension of 4,690 m² to the KEQ disturbance area, located at the north-eastern boundary previously cleared for a redundant powerline corridor.
- Minor extension and overlap of extraction boundary of both KEQ (into Lot 11) and KHRQ (into Lot 12) extraction areas to holistically encompass the highwall structure, inclusive of appropriate safety offsets.
- Extension of the KEQ extraction area to the west (highwall removal) and to the south and east.
- Reduction in blasting frequency to limit the number of blasts to a maximum of two (2) blasts per week in total between KEQ and KHRQ.

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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- Approved blasting hours at KEQ are proposed to be extended by one (1) hour to occur between the hours of 9am and 5pm (Monday to Friday).

Based on our review, the proposal will require an environment protection licence (EPL) under section 43 of the *Protection of the Environment Operations Act 1997* (POEO Act) for extractive activities and for crushing, grinding or separating, as prescribed under clauses 16 and 19 of Schedule 1 of the POEO Act.

The EPA considers that the Modification Report does provide the information required to allow us to fully complete our assessment. The EPA has the following advice:

Matters to be addressed with conditions

1. Change to Blasting Frequency and Hours

The EPA notes the change to the blasting frequency reducing the number of blasts per week from three to two. The EPA also notes the extension of permitted blasting hours to 5pm (Monday to Friday). The blast impact assessment provides that blasting is typically undertaken during the middle of the day and only when fine weather conditions prevail. Blasting outside these hours will only be undertaken in unforeseen circumstances (e.g. safety issue with explosives) or the event of a misfire or other emergency.

2. Noise

The EPA notes the proposed increase in the Day and Evening Limits for dwelling H, plus the addition of dwelling I to the operational noise criteria. Following a review of the Noise Impact Assessment, the EPA understands that dwelling H was approved and built after KEQ commenced operations. The EPA further notes the Mid Coast Council approval for the construction of the dwelling H included a condition for acoustic treatment to reduce any noise impacts from KEQ.

The EPA has attached recommended conditions for amendments to the blasting hours and noise limits, please refer to attachment A.

Matters for consideration

1. Surface Water Management

The EPA has reviewed the Surface Water Assessment (SWA) and notes that, following the highwall removal between KEQ and KHRQ, surface water will naturally flow towards KEQ. The extraction pit catchment is expected to increase from 14.4 hectares to 20.62 hectares.

The SWA identifies several site modifications, including the relocation and resizing of Dam 2, resizing of Dam 3, and an expansion of the stockpile area. These changes were approved in Modification 10. Any cumulative water quality impacts from the approved Modification 10 should be clearly assessed in conjunction with the current proposal.

Mitigation measures are proposed to include the construction of a bund wall along the Lot 11/12 boundary to separate flows, and an increase in the capacity of the in-pit sump. However, the EPA notes that the increase in the catchment area may result in a corresponding increase in discharges from the premises.

Accordingly, the EPA recommends that the proponent update their water management plan and consider adding the following additional information:

- Update the area (hectares) of exposed land used in the modelling of surface water quality impacts and ensure it is representative of the proposed future operations on the consolidated site. For example, the intended clearing of vegetation for the “Approved Stockpile Area”.
- Detail the frequency, duration and volumes of water proposed to be discharged from the stormwater detention basins under a range of operating scenarios, including worse case conditions.
- Undertake an assessment of the potential impacts of removal of the highwall, increased pit catchment, expanded stockpile area with redesigned dams, and future consolidation of the two quarries on the Port Stephens – Great Lakes Marine Park and any downstream industries and activities.
- Detail any additional management measures that have been put in place to mitigate discharges, such as onsite water management measures between KEQ and KHRQ.

2. Air Quality

The EPA notes the Air Quality Impact Assessment (AQIA) concluded the proposed modification is not expected to cause adverse impacts to sensitive receivers. The EPA recommends that clarification should be provided as to whether the air quality modelling has accounted for the cumulative impacts associated with the additional exposed areas approved under Modification 10.

The assessment also proposes the inclusion of assessment criteria for PM_{2.5} and 24-hour average criteria for PM₁₀ and PM_{2.5}. To support these changes, an updated monitoring program will be required, including the installation of an additional High Volume Air Sampler (HVAS), and two real-time air monitors. Accordingly, the EPA recommends that the proponent update their Air Quality Management Plan to reflect these revised requirements.

If you have any further questions about this request, please contact Daniel Stokes at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely



SIMON JONES
Unit Head – Industry Assessments
NSW Environment Protection Authority

Attachment A – EPA Recommended Conditions

Please note, the condition numbering reflects condition numbers within an Environment Protection Licence are for representative purposes only.

Noise Limits

L4.1 Noise generated at the premises must not exceed the noise limits in the table below.

Noise Assessment Location	Morning Shoulder LAeq (15 min)	Morning shoulder LA max	Day LAeq (15 min)	Evening LAeq (15 min)
A (74 Mill Hill Close, Karuah, Lot 100 DP 1028885)	35	52	42	40
B (64 Mill Hill Close, Karuah, Lot 3 DP785172)	35	52	40	40
G (2 Halloran Road, North Arm Cove, Lot 1 DP1032636)	35	52	43	39
H (21 Halloran Road, North Arm Cove, Lot 10 DP1032636)	35	52	45	47
I (51 Halloran Road, North Arm Cove, Lot 11 DP 1032636)	35	52	40	37
All other residences	35	52	40	35

Blasting

L5.1 Blasting in or on the premises must only be carried out between the hours of 9:00 am and 5:00 pm Monday to Friday. No blasting is permitted on Saturdays, Sundays or public holidays. Blasting outside of the hours specified in this condition can only take place with the written approval of the EPA.