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07 June 2022

Greg Newman
Unit Head
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NSW Environment Protection Authority
PO Box 513
Wollongong NSW 2520

Dear Greg

Port Kembla Cement Grinding Mill MP10_01020-Mod 2: Request for additional information

Further to our discussions and your request for further information regarding the Port Kembla Cement Grinding Mill (the Site) DA modification, please find below out response.

Potential increase in drag-out from slag unloading

- The Site is authorised under the existing Development Approval (MP10_0102) for 280 raw material and 464 dispatch trucks. Raw material truck movements (including granulated blast furnace slag) are significantly less than the existing DA limit.
- The modification application is for an increase in GP cement production, not ground granulated blast furnace slag (GGBFS), and this is expected to contribute to an increase in dispatch truck movements predominantly, with only a marginal increase in raw materials truck movements (Section 5.1.5 of the Modification report).
- The increase for both types of truck movement will be well within approved limits.
- Specifically for raw materials, we expect that daily truck movements will remain the same, and that we will run extra days which are currently idle time.
- Current controls were developed in response to the expected impact of maximum allowable truck movements being the 280 for raw materials and 464 for dispatch trucks. As has been demonstrated the current operations operate well within the limits set within the original approval, and current controls are both suitable and functional for the minor increase in raw material trucks.

Controls

- Existing controls at the site include fortnightly truck sweeping of roads.
- The site team conducts daily checks of the exit driveways and undertakes road sweeping on an as needs basis.

Potential changes in pH level of stormwater discharges

- The current site is located on land reclaimed by Port Kembla Port, with fill material used being a combination of slag (uncrushed blast furnace slag), fill material and quarry overburden. Geotechnical testing conducted at the site has confirmed that the substrate is slag material.
- Slag has an inherent high moisture content and reacts on mixing with water, forming an alkaline solution (pH >10).
- The increase in production is not expected to create an increase in water run-off required to be treated by the existing stormwater drainage and treatment systems (bio-retention basin).
- To reiterate, there are no physical changes on the site proposed that would disturb any soil, nor any new roofed or hardstand areas that would add additional run-off to the stormwater system.

Controls

- There are no uncovered external stockpiles of raw materials (including slag) allowed on site.
- The site operates and maintains a network stormwater drains and pipes across site, as well as a bio-retention basin located in the north-eastern area of the site. Drain wardens are installed within certain stormwater pits to remove sediment from stormwater run-off.
- Routine maintenance inspections are conducted on the stormwater drainage system, drain wardens and the bio-retention basin. The integrity of the bio-retention basin is sound, and the basin shows no sign of raw material or finished product flowing into it.
- Regular site clean ups and routine housekeeping inspections are conducted to identify potential sources of product or raw material spills and these are actioned accordingly.
- A vacuum truck (normally used for unblocking equipment) is on hand for rapid clean up if required.

Potential increase in wind-blown dust from additional clinker unloading of ships

- The increase in production will result in an estimated additional seven clinker ships per year.
- As part of the Modification report, an air quality assessment was conducted which identified that although the increase in throughput potentially means an increase in air and dust impacts from the facility, any exceedances that may occur will be likely attributed to elevated background concentrations rather than a significant incremental contribution from the proposed development. The process is not being changed and therefore the rate of emissions is expected to be the same and within capacity of existing controls.
- The increase in clinker shipments (which are relatively minor, as it will be an additional 7 ships per year) will not increase load on the clinker unloading system, and the clinker discharge rate will remain the same.

Controls

- Port Kembla Milling operates a state of art clinker unloading system. Operational controls for this system include - sensor which shows the crane operator when the grab is positioned inside hopper, radio-controlled interlock to assist in preventing spills, dust collectors.
- Dust collectors are maintained as part of a routine maintenance program.
- Unloading operations are stopped during high wind periods or in the event of visible dust excursions.
- Current practice for unloading also limits the dust generation by stopping operation while cleaning is being conducted.

Notwithstanding the above controls, Cement Australia acknowledges that there has been a complaint from an external adjacent party. Investigation into the complaint, showed this occurred during a period of very low wind and where there was no visible dust from the operations. It is likely this occurred when discharge was at near completion and the hold was being cleaned. The complaint was managed proactively with the adjacent external party and no further complaints have been received since. While Cement Australia conducts operations utilising the best available controls, there are limitations to the level of controls in certain circumstances, such as for example it is not possible to have dust extraction in the ships hold while clean up is occurring.

Should you have any further queries regarding the Port Kembla Development Approval Modification application, we would welcome the opportunity to discuss these more directly. Please don't hesitate to contact me on 0438 006 349 or Diana.Bozzetto@cemaust.com.au

Regards

DL Bozzetto

Diana Bozzetto

Group Manager - Sustainability