

14 August 2023

Mr Stephen O'Donoghue
Director, Resource Assessments
Department of Planning & Environment
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Mr O'Donoghue

RE: Atlas-Campaspe Mineral Sands Mine - Air Quality Monitoring Program Review

Tronox Mining Australia (Tronox) has operated an air quality-monitoring program (AQMP) for the Atlas Campaspe Mineral Sands Project (Project) for over 5 years. Air quality monitoring is a requirement of the conditions of NSW Development Consent (SSD_5012). Air quality criteria are provided in Condition 19, Schedule 3 of NSW Approval Development Consent SSD_5012. Tronox also holds Environment Protection Licence (EPL) 21007 issued under the NSW *Protection of the Environment (Operations) Act 1997* (POEO Act) for the Project. Under Development Consent SSD_5012 & EPL 21007, Tronox is required to undertake air quality monitoring for dust at several set locations around the Atlas Campaspe Mineral Sands Mine including along the Mineral Concentrate Transport Route. NSW Approval SSD_5012 & EPL Points 1 – 6 require monthly monitoring of dust deposition gauges (DDG) in compliance with *AS/NZS 0580.9.3:2015 Methods for sampling and analysis of ambient air*. EPA Identification Point 25 requires a high volume sampler for PM₁₀ on a 1 in 6 day cycle in compliance with *AS/NZS 0580.9.3:2015*.

Particulate Matter

Condition 19, Schedule 3 of Development Consent (SSD_5012) notes:

*The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed to ensure particulate matter emissions generated by the development do not exceed the criteria in Table 5, 6 and 7 **at any residence on privately-owned land** (emphasis added).*

The long-term and short-term impact assessment criteria for particulate matter are shown in Table and Table 2, respectively.

Table 1. Long term impact assessment criteria for particulate matter

Pollutant	Averaging Period	Criterion
Total suspended particulate (TSP) matter	Annual	90 µg/m ³
Particulate matter < 10 µm (PM ₁₀)	Annual	25 µg/m ³

Table 2. Short term impact assessment criteria for particulate matter

Pollutant	Averaging Period	Criterion
Particulate matter < 10 µm (PM ₁₀)	24-hour	50 µg/m ³

Particulate matter (PM₁₀ and TSP) is monitored using a High-Volume Air Sampler (HVAS) at air quality monitoring site PM01, located at Boree Plains residence. The HVAS was commissioned in August 2018 at this sensitive receptor. Samples are retrieved from PM01 on a six-day cycle in accordance with the *AS/NZS 0580.9.3:2015*. HVAS results are used to determine compliance with the 24-hour PM₁₀ concentration criteria. The results are also averaged over each calendar year for compliance with annual PM₁₀ criteria. TSP concentrations are determined based on the correlation between TSP and PM₁₀. A conversion factor of 50% (i.e., PM₁₀ accounts for 50% of the TSP concentration) is applied, as specified in Atlas-Campaspe AQMP.

Sampling at PM01 has occurred for over 5 years and data gathered to date shows little, if any, effect from their operations as measured by exceedances in PM₁₀. There have been no air quality-related complaints received regarding dust since monitoring commenced at Atlas-Campaspe. Dust mitigation measures continue to be implemented on site and along the Mineral Concentrate Transport Route. From the time monitoring commenced, there has been regular compliance with the long-term goal of the National Environment Protection (Ambient Air Quality) Measure as reported in past Annual Review Reports. Tronox will continue monthly monitoring of dust deposition at receptors to the Mineral Concentrate Transport Route in accordance with the AQMP.

Tronox is requesting a review of the PM₁₀ monitoring requirement at Boree Plains residence. Tronox considers there is a need remove the PM₁₀ monitoring requirement from the Atlas Campaspe EPL and Development Consent because this sensitive receiver is now permanently vacated since 2020. Tronox built an Accommodation Village for the Atlas-Campaspe Project. Tronox requires the consent from the NSW Department of Planning and Environment (DPE) on this matter.

Should you wish to discuss the matter further, please contact me at chaka.chirozva@tronox.com or 0437 146 508.

Yours sincerely,



Chaka Chirozva

Environmental Lead

Tronox Mining Australia Limited