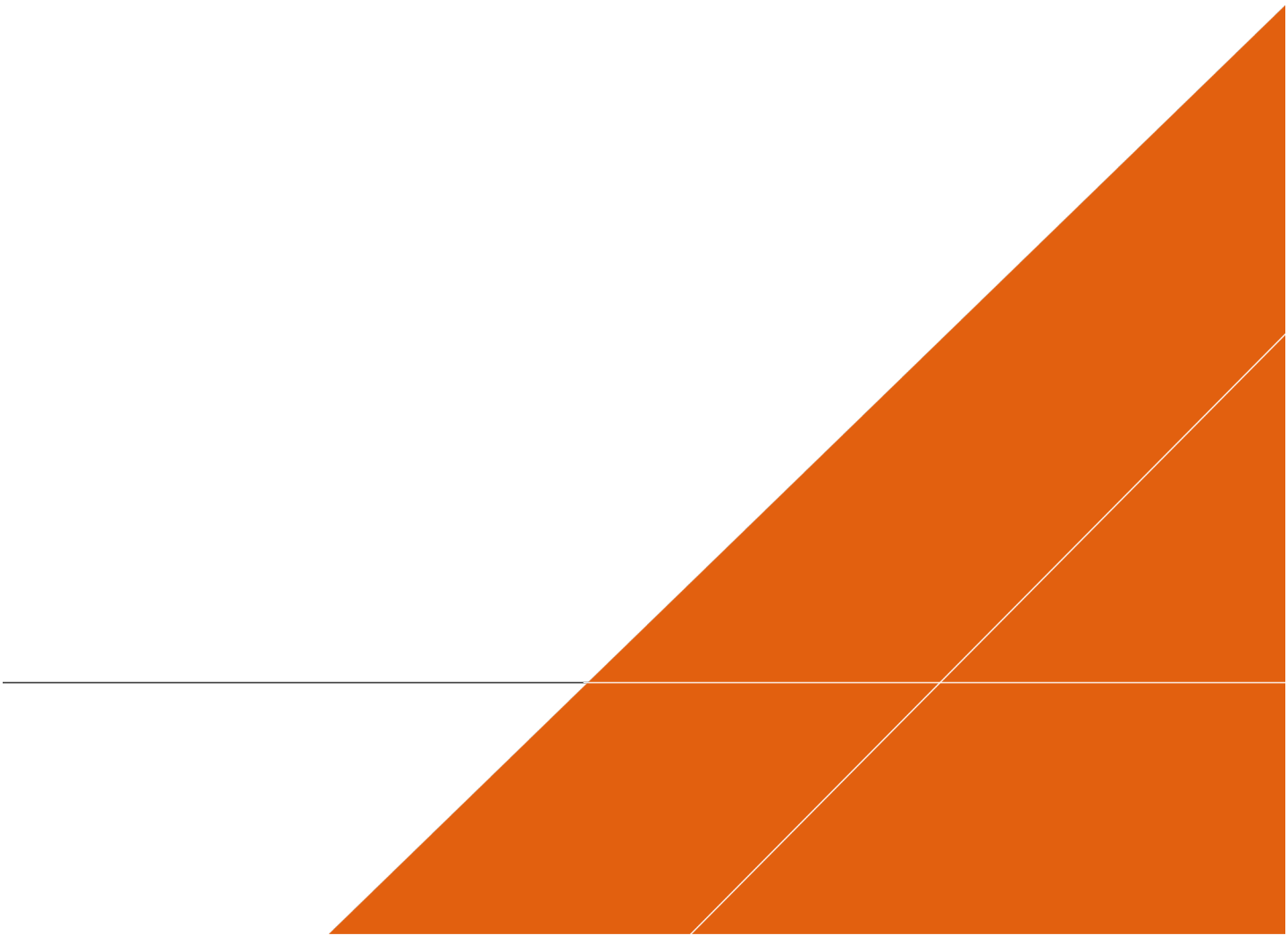
ARCADIS Design & Consultancy for natural and built assets

AIR QUALITY MANAGEMENT PLAN

23-43 & 45 Tattersall Road, Kings Park

11 SEPTEMBER 2019



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SELL AND PARKER KINGS PARK METAL RECOVERY, PROCESSING AND RECYCLING FACILITY

Air Quality Management Plan

Construction and Operation

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REVISIONS

Revision	Date	Description	Prepared by	Approved by
A	February 2017	New document	MH	CM
B	July 2017	Revised Site Layout	MH	CM
C	October 2017	Revised Site Layout – LEC S96	MH	CM
D	March 2018	Revised Site Layout	MH	CM
E	September 2019	Changes associated with Mod 3	FM, SF	HR

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GLOSSARY

Term	Definition
Arcadis	Arcadis Australia Pacific Pty Ltd
AQA	Air Quality Assessment
AQMP	Air Quality Management Plan
BCC	Blacktown City Council
BEMS	Blacktown Environment Management System
BOM	Bureau of Meteorology
CEMP	Construction Environmental Management Plan
CTM	Construction Traffic Management
DA	Development Application
DECC	Department of Environment and Climate Change
DPIE	Department of Planning, Industry and Environment (from 1 July 2019)
DP&E	(Former) Department of Planning and Environment
ECS	Emissions Collection System
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EPA	Environmental Protection Authority
EPL	Environment Protection Licence
EP&A Act	*Environmental Planning and Assessment Act 1979*
ERM	Environmental Resources Management
The Facility	The Kings Park Metal Recovery, Processing and Recycling Facility
GEM	Group Environmental Manager
GHRM	Group Human Resources Manager
GSM	Group Safety Manager
HP	Higgins Planning
KPI	Key Performance Index
LEC	Land and Environment Court

Term	Definition
LMP	Landscape Management Plan
MOD	Modification
MOD 1	The approved modifications to The Original Approval dated 6 July 2017
MOD 2	The approved modifications to The Original Approval and approved MOD 1 dated 26 February 2018
MOD 3	The approved modifications to The Original Approval and approved MOD 3 dated 29 May 2019
NMP	Noise Management Plan
NSW	New South Wales
OEMP	Operational Environmental Management Plan
The Original Approval	The approved Environmental Impact Assessment for SSD 5041 dated 12 November 2015
PIRMP	Pollution Incident Response Management Plan
POEO Act	*Protection of the Environment Operations Act 1997*
The Project	The approved activities under SSD 5041 and MODs 1 - 3
Renzo Tonin	Renzo Tonin & Associates
Sell & Parker	Sell and Parker Pty Ltd
SSD	State Significant Development
The Site	The Sell & Parker Premises at 23-43 and 45 Tattersall Road, Kings Park NSW
WMP	Water Management Plan

1 INTRODUCTION

1.1 Background

This Air Quality Management Plan (AQMP) has been prepared by Higgins Planning (HP) and updated by Arcadis Australia Pacific Pty Ltd (Arcadis) in collaboration with Sell and Parker Pty Ltd (Sell & Parker) for the Kings Park Metal Recovery, Processing and Recycling Facility (the Facility) at 23-43 and 45 Tattersall Road, Kings Park (the Site).

The Facility has been approved by the Department of Environment, Planning and Industry (DPIE) (formerly DP&E) under the State Significant Development (SSD) application No. 5041 dated 12 November 2015 (the Original Approval), including three associated modifications (the Project).

1.2 Purpose of this AQMP

This AQMP has been prepared on behalf of Sell & Parker in response to conditions A2 and B17 of the Project.

In particular, this AQMP:

- Describes the air quality management of the Project including activities to be undertaken and relative timing;
- Provides specific mitigation measures and controls that can be applied on-site to avoid or minimise negative environmental impacts;
- Provides specific mechanisms for compliance with applicable policies, approvals, licences, permits, consultation agreements and legislation;
- Describes the air quality management related roles and responsibilities of personnel;
- States objectives and targets for issues which are important to the environmental performance of the Project; and
- Outlines a monitoring regime to check the adequacy of controls.

The purpose of this AQMP is to provide detail on how Sell & Parker will manage potential emission impacts from construction and operation of the Site.

This AQMP details the air quality management procedures which also form part of the Operational Environment Management Plan (OEMP).

The structure of this AQMP is based on the DPIE's (formerly Department of Infrastructure Planning and Natural Resources) "Guideline for the Preparation of Environmental Management Plans" (2004), as well as the requirements of the Environmental Impact Statement (EIS) and supporting documents. The plan also considers the requirements of DPIE's Environmental Management plan, Post Approval Guidelines (2018).

This AQMP has been prepared based on information which forms part of Condition A2 in Schedule 2, Part A of the Original Approval and MODs 1 – 3, which states:

TERMS OF CONSENT

A2. The Applicant shall carry out the Development in accordance with the:

a) EIS prepared by ERM dated July 2014;

b) Response to Submissions report prepared by ERM dated 7 January 2015;

c) Supplementary Response to Submissions prepared by Mecone dated 30 June 2015;

d) Supplementary Response to Submissions prepared by Sell & Parker Pty Ltd dated 3 September 2015;

e) Site layout plans and drawings (See Appendix A);

f) Management and Mitigation Measures (see Appendix B);

g) Modification Application SSD 5041 MOD 1 and accompanying document titled Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park dated August 2016 prepared by Higgins Planning, additional information from Higgins Planning dated 22 December 2016, further additional information from Allens and Linklaters dated 9 February 2017 and the Town Planning Report prepared by Ethos Consulting on 29 September 2017;

h) Modification SSD 5041 MOD 2 and accompanying document titled Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park dated December 2017 prepared by Higgins Planning; and

i) Modification Application SSD 5041 MOD 3 and accompanying document titled Section 4.55(1A) Application (SSD 5041 – Mod 3), 23-43 and 45 Tattersall Road, Kings Park dated 11 February 2019 and Response to Submissions dated 4 April 2019 prepared by Arcadis Australia Pacific Pty Ltd.

In addition, Sell & Parker have had consultation meetings and discussions with both the Environment Protection Authority (EPA) and DPIE as required to assist with the preparation of this AQMP.

1.3 Site Location and Context

The Site is located in the mid-block of Tattersall Road, Kings Park and approximately 2.5 kilometres from the M7. This location is depicted in Figure 1. Kings Park is located within the Local Government Area (LGA) of Blacktown City Council (BCC), and is located approximately 41.2 kilometres from the Sydney Central Business District (CBD).

Figure 1 Site location

1.4 Site Description

The Site is located on the southern side of Tattersall Road, Kings Park (see Figure 1). The Site has a legal description of Lot 2 in DP 550522 and Lot 5 in DP 7086. The Site is significantly lower than the level of Tattersall Road to the north and is relatively flat/level with a fall towards its rear boundary. The Site is largely cleared, with the exception of some trees scattered and screening plants across the perimeter front and rear boundaries.

The existing Facility is screened by mature trees along the Tattersall Road frontage of the land between the property boundary and the existing acoustic wall along the frontage of the portion of the site at 45 Tattersall Road. An open storm water drainage channel, Waller Creek, runs along the eastern boundary. Adjacent to the Site's southern boundary is Breakfast Creek.

1.5 Existing Environment and Sensitive Receptors

The Facility is primarily surrounded by commercial and industrial land uses within a 500 metre radius. The exception to this is where residential land uses back on to Sunnyholt Road around 350 metres to the east of the site.

The nearest watercourse is located along the rear or southern boundary of the Site, known as Breakfast Creek. This is a modified urban waterway that flows through the industrial estate from east to west (refer to Figure 2 below).

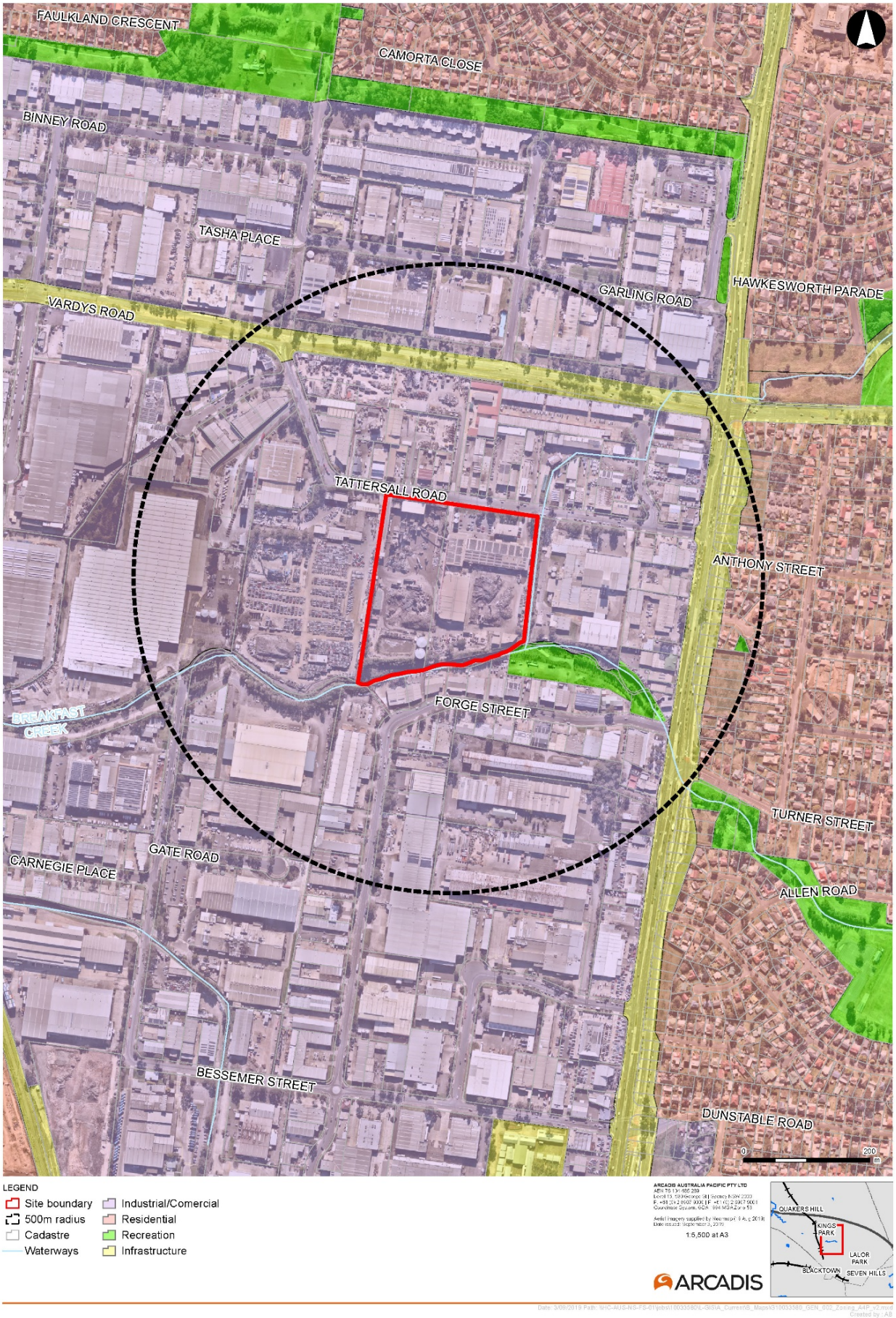

Figure 2 Nearby sensitive receptors

For information on mitigation measures, monitoring, controls and exceedance management measures refer to Sections 6, 7, 8 and 9 of this AQMP.

1.6 Scope

The scope of this AQMP includes, but is not limited to:

- An overview of the potential environmental impacts of the Facility;
- A description of the management measures to protect the environment;
- An overview of the Site operations (refer to the Site Layout Plan in Appendix A);
- Guidance on compliance with the relevant environmental legislation including the Environment Protection Licence (EPL) (copy at Appendix G) and Original Approval (copy at Appendix C);
- Provision of appropriate mitigation measures for the key environmental issues;
- Definitions of the roles and responsibilities of the construction and operational teams; and
- The basis for monitoring, reporting and maintaining compliance with regulatory requirements.

1.7 Environmental Management System Context

Figure 3 below describes the structure of the Environment Management System (EMS) for the Facility and how it relates to this NMP.

Figure 3 Structure of the EMS for the Facility

The EMS establishes management responses and frameworks for each management plan and implementation at Sell & Parker Kings Park. The EMS sets the evaluation triggers which will ensure systems and processes are reviewed in the drive for continuous improvement.

1.8 AQMP Objectives and Outcomes

Table 1 below outlines the key objectives of this AQMP:.

Table 1: AQMP Objectives and Outcomes

Objectives	Outcome
To ensure compliance with all applicable regulatory conditions for the Facility.	Compliance is achieved, maintained and verified through independent auditing.

Objectives	Outcome
To minimise non-compliances.	Improved environmental protection.
To implementation of agreed air quality management mitigation measures.	All agreed air management and mitigation measures are implemented and maintained.
To implement baseline air quality studies.	Create a standard to which variations over time can be measured against.
To use technology when it becomes available to ensure ongoing improvement and environmental protection.	Continuous improvement so compliance is met now and into the future.

1.9 Environmental Policy

Sell & Parker are committed to operating to the principles of continuous improvement and reducing the sites environmental footprint. This is outlined in the Sell & Parker Environment Policy, a copy of which is included at Appendix B and available on the Sell & Parker website, www.sellparker.com.au under 'About Us', 'Links' and 'Environmental Reports'. All employees and contractors undergo an induction which includes familiarisation with the requirements of the Environment Policy.

Sell & Parker is committed to operating to the principles of continuous improvement and reducing the Site's environmental footprint. This is outlined in the Sell & Parker Environment Policy, a copy of which is included at Appendix B and available on the Sell & Parker website, www.sellparker.com.au under 'About Us', 'Links' and 'Environmental Reports'. All employees and contractors undergo an induction which includes familiarisation with the requirements of the Environment Policy.

The key aspects of the Sell & Parker Environment Policy are:

- Ensure all employees, contractors and associates have an understanding of this Policy, the Environment Management System (EMS), Stormwater Management Plan and Safe Working Procedures;
- Ensure all operations are undertaken in an environmentally responsible manner and in accordance with the relevant environmental legislation, regulations, statutory obligations and relevant voluntary codes of practice;
- Measure, monitor and report on environmental initiatives;
- Regularly review business operations to identify and implement opportunities for improvement;
- Record, investigate and implement the appropriate corrective action for all environment incidents; and
- Periodically review and revise this Policy and Safe Working Procedures to maintain their relevance.

Sell & Parker is committed to complying with all of its legal obligations. Compliance to applicable regulatory requirements in regard to the operations at the Facility will be achieved through:

- Identifying and assessing statutory requirements that are directly applicable;
- Consulting with relevant government bodies and agencies;

- Internally communicating relevant statutory requirements;
- Providing relevant training;
- Monitoring and reviewing internally and via third parties the Sell & Parker environmental management system;
- Inspections by the Site, Group Safety and Group Environment Managers; and
- Updating EMP's where required should legislation change.

2 LEGAL AND CONSENT REQUIREMENTS

This section details the legislative requirements that relate to the site in terms of air quality management.

2.1 Legislation

Legislation relevant to construction management:

- National Construction Code (NCC) (Building Code of Australia BCA)
- *Protection of the Environment Operations Act 1997*
- *Protection of the Environment Operations (General Regulation) 2007*.

2.2 Consent Conditions

Table 2 below details the AQMP to comply with Condition B17 and where in this document each component has been addressed:

Table 2: AQMP Condition B17 summary and document reference

Consent Condition	Document Reference
***B17.** Prior to the commencement of construction of the Development, the Applicant shall prepare an Air Quality Management Plan to the satisfaction of the Secretary. The plan must:*	
a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;	Sections 1.1 & 1.6
b) describe all the measure that would be implemented to ensure:	
(i) all reasonable and feasible measures are employed to minimise air emissions;	Sections 6 & 7
(ii) compliance with the relevant conditions of this consent;	Section 2.3
(iii) contingency measures are deployed to minimise impacts should adverse air emissions occur or appear likely to occur;	Section 9
c) include well defined triggers for the deployment of constructional and operational air quality measures;	Section 5
d) include well defined triggers for ceasing or partially ceasing operations on site during adverse air quality conditions;	Section 5
e) include an Air Quality Monitoring System to evaluate the performance of the Development commensurate with the system proposed in the Air Quality Assessment prepared by ERM dated September 2015;	Section 8

Consent Condition	Document Reference
f) include details of the location, frequency and duration of monitoring; and	Section 8.2
g) include a protocol to determine the occurrence of any exceedance of the criteria in the EPL should an exceedance occur.	Section 9

2.3 Consent Conditions Compliance

The Original Approval (refer Appendix C) and MOD 1 (refer to Appendix F), provide details of all DPIE requirements for the Site's development. In Table 3 below are the specific air quality control, mitigation and monitoring requirements. The table has a document reference column indicating where the requirement is specifically addressed in the plan and/or other documentation.

Table 3: Development Consent Air Quality Conditions Compliance Table

Section	SSD 5041 Air Quality Conditions	Document Reference
B15	*Shall ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).*	Section 5.1
B16	*Shall ensure that emissions from the development do not exceed the emission limits specified in the EPL.*	Sections 5.3
B17	*Prior to the commencement of construction of the Development, the Applicant shall prepare an Air Quality Management Plan to the satisfaction of the Secretary. The plan must:*	
B17 (a)	*be prepared by a suitably qualified and experienced person(s) in consultation with the EPA;*	Sections 1.1 & 1.6
B17 (b)	*describe all the measure that would be implemented to ensure:*	
B17 (b)(i)	*all reasonable and feasible measures are employed to minimise air emissions;*	Sections 6 & 7
B17 (b)(ii)	*compliance with the relevant conditions of this consent;*	Section 2.3
B17 (b)(iii)	*contingency measures are deployed to minimise impacts should adverse air emissions occur or appear likely to occur;*	Section 9
B17 (c)	*Include well defined triggers for the deployment of constructional and operational air quality measures;*	Section 5
B17 (d)	*Include well defined triggers for ceasing or partially ceasing operations on site during adverse air quality conditions;*	Section 5
B17 (e)	*Include an Air Quality Monitoring System to evaluate the performance of the Development*	Section 8

Section	SSD 5041 Air Quality Conditions	Document Reference
	commensurate with the system proposed in the Air Quality Assessment prepared by ERM dated September 2015;	
B17 (f)	*Include details of the location, frequency and duration of monitoring; and*	Section 8.2
B17 (g)	*Include a protocol to determine the occurrence of any exceedance of the criteria in the EPL should an exceedance occur.*	Section 9
B18	*Shall carry out the development in accordance with the AQMP approved by the secretary.*	This AQMP
B19 (a)	*Operate the development so that air emissions are minimised during all meteorological conditions; and.*	Section 8.2 & this AQMP
B19 (b)	*Implement best management practice, including all reasonable and feasible air and odour emissions mitigation measures to minimise emissions from the development, including but not limited to:*	Sections 6 & 7
B19 (b) (i)	*Installation of an Emissions Collection System (ECS) servicing the hammermill that is capable of achieving control performance equivalent to the system described in the Air Quality Assessment prepared by ERM dated September 2015;*	Section 7.3.1
B19 (b) (ii)	*Operate one oxy-acetylene torch at a time;*	Section 7.7
B19 (b) (iii)	*Operate the oxy-acetylene torch only between the hours of 9am and 3pm;*	Section 7.1 and 7.7
B19 (b) (iv)	*Cutting any metal beam that is up to 100mm thick with the shear, where possible;*	Section 7.3.3
B19 (b) (v)	*Enclosure of all conveyors and conveyor transfer points;*	Section 7.3.2
B19 (b) (vi)	*Dust suppression though the use of water sprays/misters;*	Sections 6.10, 7.3.4 & 9.1
B19 (b) (vii)	*Sealing of on-site surfaces and regularly maintaining them to prevent dust re-entrainment from vehicle movements and other equipment use; and*	Section 7.3.5
B19 (b) (viii)	*Installation of appropriate dust screens at the property boundaries.*	Sections 6.4
B20	*Shall commission the emissions collection system for the hammermill. EMS commissioning shall;*	Section 7.3.1
B20 (a)	*Be undertaken by a suitably qualified and experienced person(s) in consultation with the EPA;*	Section 7.3.1
B20 (b)	*Test the performance of the system against the performance parameters set out in the Air*	Section 8.4

Section	SSD 5041 Air Quality Conditions	Document Reference
	Quality Assessment prepared by ERM dated September 2015; and	
B20 (c)	*Identify and implement any changes to the system that may be necessary to achieve environmental air quality performance commensurate with that set out in the Air Quality Assessment prepared by ERM dated September 2015.*	Section 9.0
B21	*Shall submit to the Secretary a commissioning report detailing the outcomes of the commissioning of the ECS for the hammermill.*	Section 8.4
B22 (a)	*During construction all vehicles on site do not exceed a speed of 30kmh;*	Section 7.5
B22(b)	*During construction all loaded construction vehicles entering or leaving site have their loads covered; and*	Section 6.2
B22(c)	*During construction all construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking the materials on public roads.*	Section 6.10
B23	*Shall manage stockpiles of scrap metal and processed material to ensure air emissions are minimised.*	Section 6.12
C5	*Ensure that the environmental management plans are prepared in accordance with relevant guidelines.*	Sections 1.6 & 2.5
C5 (a)	*Environment management plans have detailed baseline data.*	Section 8.4
C5 (b) (i)	*Environment management plans have a description of relevant statutory requirements.*	Section 2
C5 (b) (ii)	*Environment management plans (EMP's) include relevant limits or performance measures.*	Section 5
C5 (b) (iii)	*EMP's include specific performance indicators that are proposed to judge the performance of the development.*	Section 5
C5 (b) (iv)	*EMP's include the measures to be implemented to comply with statutory requirements, limits, performance measures or criteria.*	Sections 6 & 7
C5 (c) (i)	*Monitoring program to report on the impacts and performance of the development.*	Section 8
C5 (c) (ii)	*Monitoring program to report on the effectiveness of management measures.*	Section 8

Section	SSD 5041 Air Quality Conditions	Document Reference
C5 (c) (iii)	*Monitoring program for contingency to manage unpredicted impacts and their consequences.*	Section 9
C5 (c) (iv)	*A program to investigate and implement ways to improve environmental performance of the development over time.*	Sections 1.8 & 12.0
C5 (d) (i)	*A protocol for managing and reporting incidents.*	Section 9.2
C5 (d) (ii)	*A protocol for managing and reporting complaints.*	Section 10.0
C5 (d) (iii)	*A protocol for managing and reporting non-compliances with statutory requirements.*	Section 9
C5 (d) (iv)	*A protocol for managing exceedances of the impact assessment criteria and/or performance criteria.*	Section 9.1
C5 (d) (v)	*A protocol for periodic review of the plan.*	Section 12.0
C7	*Incident reporting.*	Section 9.2
C8	*Provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting requirements in any plans or programs approved in the consent.*	Section 9.5
C9	*Audits.*	Section 11
C10	*Within 3 months of commissioning the audit, submit a copy of the report to the secretary, together with responses to any recommendations contained in the audit report.*	Section 11.2
C11	*Annual review*	Section 12.0
C12	*Revision of plans*	Section 12.0

2.4 Licence

The Sell & Parker Facility operates under an Environment Protection Licence (EPL) issued by the Environment Protection Authority (EPA). This EPL 11555 has been modified to reflect the Original Approval and the changed operational conditions as part of the Project.

EPL 11555 is available on the EPA website and the Sell & Parker website, www.sellparker.com.au, under links and Environmental Reports. The licence is attached in Appendix G.

2.5 Standards and Guidelines

The main standards, policies and guidelines relevant for the development and operation of the Site include:

- National Environment Protection Council's (NEPC) – National Environment Protection Measure (NEPM) for Ambient Air Quality
- *AS/NZS 3580.1.1:2016* Methods for sampling and analysis of ambient air – Guide to siting air monitoring equipment OR AS 2922-1987 Ambient Air – Guide for the siting of sampling equipment
- *AS/NZS 3580.10.1:2016* Methods for sampling and analysis of ambient air – Determination of particulate matter – deposited matter – gravimetric method
- Approved methods for the Sampling and Analysis of Air Pollutants in New South Wales (NSW DEC, 2006)
- Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (NSW DEC, 2005)
- Guidance on the assessment of dust from demolition and construction (IAQM 2014)
- Guideline for the Preparation of Environmental Management Plans: Department of Infrastructure Planning and Natural Resources, 2004
- Environmental Management Plans – Post Approval Guidelines, Department of Planning and Environment, 2018.

2.6 Consultation Process

Sell & Parker is committed to meaningful stakeholder engagement and has worked in collaboration with relevant government agencies and local community to work through issues associated with site approvals and operations.

2.6.1 Internal

Discussions with directors, senior managers, key personnel and contractors have been conducted in the development of this AQMP.

2.6.2 External

The following authorities have been consulted with in relation to requirements of this AQMP;

- Department of Planning, Industry and Environment (DPIE) (formerly DP&E);
- Environment Protection Authority (EPA); and
- Blacktown City Council (BCC).

No issues have been raised by other government authorities.

2.6.3 Community

Feedback from the community was sought during the development application process for the Original Approval. This feedback was considered in the development of this AQMP.

The process by which the community was consulted included:

- Community consultation meeting; and
- Mailbox drop.

Community feedback was made available on the DPIE's website.

Prior to the commencement of construction and during the construction process, letter box drops and informal meetings occurred with the closest neighbouring businesses along Tattersall Road.

3 ROLES AND RESPONSIBILITIES

The key positions and their environmental duties around air quality management are outlined in Table 4 below.

Table 4: AQMP Roles and Responsibilities

Company	Role	Responsibility
Sell & Parker	Directors	• Ensure resources and funding is available to perform required tasks • Ensure managers have required skills and training to fulfil required tasks • Ensure managers are fulfilling required monitoring and reporting tasks.
Sell & Parker	Site Manager	• Ensure all site personnel have and maintain recommended training • Ensure any non-conformances are investigated and where required reported • Utilise CCTV to ensure process efficiencies are being maintained.
Sell & Parker	Legal	• Ensure legislative updates are passed though and documents and licences are appropriately updated.
Sell & Parker	Site Supervisors	• Report any known or suspected issues.
Sell & Parker	Group Safety Manger	• Overall Site Safety • Approve any safety matters that impact site operations • Ensure the builder has site specific Safety Plans and Safe Work Method Statements, as required • Ensure compliance with Sell & Parker Contractor Management System.
Sell & Parker	Group Environmental Manager	• Overall site environmental activities • Liaise with relevant authorities as required • Ongoing development of EMP's and revision where required • Review monitoring reports for compliance • Brief contractors of environmental requirements for their activities • Inspect works and when required do sampling • Ensure monitoring is taking place • Ensure reporting is taking place

Company	Role	Responsibility
		• Where applicable, community consultation is fulfilled • Utilise CCTV to ensure process efficiencies are being maintained.
Sell & Parker	Maintenance Manager	• Ensure all plant and mobile plant is operating to specifications.
Sell & Parker	All Personnel	• Report any known or suspected issues • Be aware of and minimise fugitive dust generation in their activities.
Contractor	Site Manager	• Fulfilment of applicable Sell & Parker EMP requirements • Reporting of any known or suspected issues • Be aware of and where applicable, minimise resource usage in their activities • Follow all reasonable directions.

4 TRAINING

All on site employees and contractors will undergo site induction and training which is a combination of Sell and Parkers Learning Management System (LMS), regular toolbox talks/chats, and other on the job training. Training will vary depending on specific duties performed but will include:

- Relevant legislation
- Consent requirements
- Licence requirements
- Monitoring processes
- Mitigation measures
- Complaint process

Training programs are designed by the Group Human Resources Manager (GHRM), Group Safety Manager (GSM), Group Environment Manager (GEM) and Legal. The Site Manager is responsible for ensuring training is undertaken, as outlined in Section 4 of this AQMP.

5 AIR QUALITY CRITERIA

The air quality construction and operational criteria as specified in the Original Approval includes:

5.1 Odour

As specified in condition B15, Sell & Parker shall ensure the development does not cause or permit the emission of any offensive odour as defined in the POEO Act 1997.

5.2 Hours

Sell & Parker facility has the following operational and construction hours as specified in condition B31 of the Original Approval.

Table 5: Construction and Operational Hours

All Activities	
Operational Hours	
Monday to Saturday	6:00 am to 9:00 pm
Sunday	Nil
Public Holidays	Nil
Cleaning and Maintenance	
Monday to Saturday	9:00 pm to 6:00 am
Sunday & Public Holidays	24 hours
Oxy-acetylene Torch Cutting	
Monday to Saturday	9:00 am to 3:00 pm
Sunday & Public Holidays	Nil
Construction Hours	
Monday to Friday	7:00 am to 6:00pm
Saturday	8:00 am to 1:00pm
Sunday	Nil
Public Holidays	Nil

As specified in Condition B32, despite the above approved hours, delivery of material to the site may occur at any time, if that delivery is required by the Police or other authorities; and/or there is an on-site emergency that poses an immediate danger to personnel or equipment. In such circumstances, prior notification shall be provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.

5.3 Emission Limits

5.3.1 Hammermill

The Facility has the following air quality limits, specified as EPA identification point 3, Hammermill stack, Condition L2.2 of the EPL. These are the triggers for the deployment of constructional and operational air quality measures as well as the triggers for ceasing or partially ceasing operations on Site during adverse air quality conditions.

Table 6: Hammermill Emission Limits

Pollutant	Unit of Measure	100 percentile limit	Reference conditions	Averaging period
Type 1 & 2 substances in aggregate	mg/m^3	1	Dry 273K, 101.3kPa	1 hr or the minimum sampling period specified
Solid Particles	mg/m^3	20	Dry 273K, 101.3kPa	1 hr or the minimum sampling period specified

5.3.2 Site Emissions

The Facility has the following site air quality emission limits, as outlined in the EIS:

Table 7: Site Emissions Limits

Pollutant	Unit of Measure	100 percentile limit	Averaging period
Fugitive dust	$\mu g/m^3$	50	4 hour rolling average

5.4 Wet Scrubber

As specified in Condition B19 (b) (i), Sell & Parker have had an Emissions Collection System (ECS) installed on the hammermill capable of achieving control performance equivalent to the system described in the Air Quality Assessment (AQA) prepared by ERM dated September 2015. Commissioning and approval of the ECS in accordance with Conditions B20 and B21 is discussed in Section 8.4 of this AQMP.

5.5 Oxy-Acetylene

As specified in Condition B19 (b) (ii), Sell & Parker shall ensure they are operating one oxy-acetylene torch at a time. As specified in Condition B19 (b) (iii), Sell & Parker shall ensure that the oxy- acetylene torches operate only between 9:00am and 3:00pm Monday to Saturday.

6 MITIGATION AND IMPLEMENTATION MEASURES

The main fugitive emission generating activities that have been identified for site are:

- The shear
- Oxy-cutting
- The pre-shredder
- Conveyors
- Material stockpiles
- Vehicular movements
- Truck unloading.

Measures that will be implemented to ensure all reasonable and feasible measures are employed to minimise air quality emissions for these and other activities include:

6.1 Design Measures

6.1.1 Traffic Management

The following traffic management measures have been included in the design of the facility to minimise air quality emissions from vehicles movements:

- Single pass traffic flow.;
- The facility is fully sealed to minimise fugitive dust emissions from vehicular movement
- Separation of non-ferrous vehicles from the truck flow path. Non-ferrous operations will be moved from 45 Tattersall Road to 23 Tattersall Road where it will utilise its own driveway
- A new wheel wash will be installed in front of the exit weighbridge and will be operational prior to the weighbridge commencing operation
- A street sweeper will be utilised to clean site roadways and other areas on site, as required
- A truck wash area will be developed (location K in the site plan) for the washing of all construction vehicles prior to leaving the site
- All construction vehicles must have their loads covered when entering or leaving site.

6.1.2 Physical Barriers – Fencing

There are several different types of fences used on Site. They are used for:

- Noise mitigation
- Dust mitigation
- Security.

Approved fence installation is based on engineering designs and are built to those specifications. The Group Environment Manager (GEM) will inspect the fences monthly and any failures, gaps or holes noted and placed onto a maintenance report for

rectification. The rectifications shall be done using appropriate materials that do not diminish the qualities of the fence.

For fugitive dust emissions Sell & Parker are

- Retaining the existing acoustic wall along the northern boundary
- Retaining and improving the existing acoustic wall along the western boundary;
- Increasing the height of the wall along the entry driveway
- Converting the existing fence on the eastern boundary from a 2.4 metre cyclone fence to an 8 metre solid fence
- Converting the existing fence on the southern boundary of 23 Tattersall Road from a 2.4 metre cyclone fence to a 4 metre colorbond fence.

6.2 Process Efficiency

The (GEM) monitors process efficiency through the Key Performance Index (KPI) for site diesel and electricity usages.

The Maintenance Manager ensures all plant and equipment installed and used on site is maintained and operated in a proper and efficient condition. Excessive resource usage is noted and investigated.

The Site Manager through site walks and watching CCTV footage can identify any poor practices and initiates operational improvements.

6.3 Maintenance

6.3.1 Equipment

The Maintenance Manager is responsible to ensure all plant and equipment installed and used on site are maintained and operated in a proper and efficient condition. It will be maintained as required.

6.3.2 Physical Barriers and Dust Screens

Acoustic fences, dust screens and walls will be:

- Inspected monthly by the GEM with any identified failures, gaps or holes placed onto a maintenance report for rectification
- Rectifications shall be done using appropriate materials that do not diminish their acoustic of dust collection qualities.

6.4 Equipment and Plant Operation

Plant and equipment operators are trained to handle material to maximise the discovery of hidden unwanted items while minimising dust. Spotters have also been implemented to undertake this task. In the processing of sorting the infeed material, suspicious and oversized objects are put aside for checking, removal or reassignment.

6.5 Loading and Unloading

6.5.1 Loading

The shred is damp which reduces emissions. All non-ferrous materials are loaded inside the non-ferrous building or directly into shipping containers.

The floc is loaded in an enclosed building which reduces fugitive emissions.

6.5.2 Unloading

There are four unloading points:

- Black iron (Shredder)
  - Trucks unload into water to reduce emissions
  - Water sprays are used to reduce emissions where possible.
- Heavy Materials (Shear)
  - Water sprays are used to reduce emissions where required
- Non-ferrous
  - Vehicles unload inside the building
- Oxy-cutting
  - Items are lifted from the truck and placed into the cutting area.

Note: Heavy materials are those that can't be processed through the shredder because they are too thick.

6.6 Water

Water in the form of sprays, misters, hoses, cannons is utilised on site for dust emission suppression. The type of water utilisation is dependent upon the process and prevailing conditions. The majority of black iron unloading is done into water to mitigate dust movement. Ferrous vehicles exit site via the wheel wash.

During construction all construction vehicles leaving the site will be cleaned of all dirt, sand and other contaminant materials immediately prior to leaving the site.

Details of water management and treatment are in the WMP.

6.7 Fugitive Emissions Monitoring

Portable monitoring equipment is being installed to determine the sites and individual equipment and activities contribution to background dust levels. The monitoring for fugitive dust emissions is discussed in Section 8.2.

6.8 Stockpile Management

- Pre and post processing stockpiles will be managed to ensure emissions are minimised
- Water will be utilised to minimise fugitive dust emissions from stockpiles
- Floc stockpile will have a maximum height of 4 metres
- Pre-shredder processing will utilise water sprays as required

- Equipment operators are trained to handle material to maximise the discovery of hidden unwanted items while minimising dust.

6.9 Sweeper

A street sweeper cleans site roadways as required. Additional visits are organised when:

- Daily inspections deem it necessary or
- Adverse weather conditions are expected.

6.10 Floc

The previous storage for shred residual materials was in a semi enclosed area in the North West corner of 45 Tattersall Road. This has been relocated to the centre of the Facility in a fully enclosed building. The floc is monitored by a fire monitoring system which includes thermal and flame cameras for fire detection.

6.11 Oxy-Acetylene

As specified in Condition B19 b) ii), Sell & Parker shall ensure they are operating one oxy-acetylene torch at a time. As specified in Condition B19 b) iii), Sell & Parker shall ensure that the oxy-acetylene torches operate between 9:00am to 3:00pm Monday to Saturday. Oxy-cutting is conducted under wet conditions.

As specified in the Air Quality Assessment (AQA) prepared by ERM dated September 2015, Oxy-Acetylene cutting will be greatly reduced with the minimum thickness of metal cut being greater than 100mm. Oxy-cutting will be undertaken under wet conditions, which will reduce the level of metal fumes and NOX emissions being produced.

6.12 Trommel Screen

The existing free standing separator became semi enclosed through the Original Approval. A removable roof and walls were installed around it that reach halfway to the ground.

6.13 Hammermill

Indux Air Systems Pty Ltd have installed an Emissions Collection System (ECS) on the Hammermill which has been approved by the EPA..

6.14 Shear

A larger shear has been installed at 23 Tattersall Road. This modern shear is designed and built to meet improved air quality standards. It also has the capability of cutting metal up to 100mm thick thus reducing the requirement for oxy-cutting.

All metal beams up to 100 millimetres thick will be cut with the shear, where possible.

6.15 Conveyors

As part of MOD3, all conveyors and their transfer points have been built to reduce fugitive dust emissions.

6.16 Construction

Construction activities will be monitored to the same standards as operational activities. Mitigation measures for construction activities will be discussed and implemented as required based on dust generation potential. The portable dust monitors will be utilised to validate construction activity emission contribution. Construction activities will meet the Construction Environment Management Plan requirements.

6.17 Greenhouse Gas

- The Site shall remain sealed to reduce mobile plant emissions
- The Site has changed from a twin pass to a single pass movement to reduce vehicle travel and therefore reduce fugitive as well as combustion emissions
- New equipment shall conform to required manufacturers operational standards
- New equipment shall improve metals recovery, thus decreasing the need for extractive processing
- Fuel, water and electricity consumptions shall be monitored and efficiency improvements in use implemented where feasible.

6.18 Quarantine Area

An area has been set up to store items on Site that are not able to be processed or require detailed inspection to confirm they can be processed. The area is segregated from normal operations. If the item can't be processed it will be collected by the supplier or disposed of as per relevant regulations.

7 CONTROL MEASURES

The air quality control measures for the site include:

7.1 Hours

Operational hours are outlined in Section 5.2 of this AQMP.

7.2 Emission Limits

Emission limits are outlined in Section 5.3 of this AQMP.

7.3 Engineering Controls

Sell & Parker have the following engineering controls designed to prevent the generation of fugitive dust emissions:

7.3.1 Emissions Collection System

As outlined in Section 5.4 above, Indux Air Systems Pty Ltd have installed an Emissions Collection System (ECS) on the Hammermill and has been approved by EPA.

7.3.2 Conveyors

All existing and new conveyors, including their transfer points, shall be enclosed to minimise fugitive dust emissions.

7.3.3 1400T Shear

The 1400T Shear is capable of cutting metal beams up to 100mm thick. As this shear is capable of cutting larger materials than previous shears, it reduces the volume of material requiring oxy-cutting, thereby reducing overall emissions from oxy-cutting

All metal beams up to 100 millimetres thick will be cut with the shear, where possible.

7.3.4 Water Sprays

Various water spray dispensing systems are used on site. Uses include, but not limited to;

- Stockpile management;
- Road damping;
- Unloading wetting;
- Pre-shredder sprays;
- Shredder mist sprays; and
- Belt sprays.
- Fire management

Details of water management and treatment are in the WMP.

7.3.5 Internal Roads

Other than landscaped areas the site is fully sealed. Carparks are in bitumen and areas that take truck traffic are in concrete. Sealed areas reduce fugitive dust emissions and are easier to maintain.

These sealed areas are to be regularly maintained to ensure that dust and dirt is not re-entrained from vehicle movement and other equipment use.

These areas are inspected monthly by the GEM to ensure they remain compliant.

7.4 Administrative Controls

The following administrative controls have been adopted on Site for operational activities.

Table 8: Administrative Controls

Administrative Control	Plan or Section
All onsite employees and contracts will undergo noise related training via Toolbox.	Section 6.0
Maintenance will maintain equipment to manufacturer's standards.	Section 6.6.1
Street sweeper.	Section 6.13
Scrap handling.	Sections 6.9.2 & 6.17
Oxy-cutting.	Section 6.14
Stockpile management.	Section 6.12
Monthly site inspections.	Section 8.3

7.5 Transport

Transport drivers are made aware of the need to minimise practices that have the potential to generate fugitive dust emissions through toolbox talks..

There is a site speed limit of 10kmh. This applies to all trucks, cars and mobile plant.

On site Sell & Parker will install a sign in the driveway that states that truck drivers are required to:

- Limit use of air and engine breaks
- Keep Engine RPM's to a minimum
- Use horns for emergencies only
- Comply with Site Speed Rules & Limits

7.6 Construction

Contractors doing construction work will be briefed on site air quality obligations for their activities and material stockpiles and required to maintain site standards.

7.7 Oxy Cutting

The use of oxy-acetylene torches shall be restricted to one torch per time with operational hours of 9:00am to 3:00pm.

7.8 Deductions

All loads are monitored during unloading to determine the quality and cleanliness of the material. Suppliers that provide materials which contain non-metal componentry e.g. hot water service, receive a price downgrade.

Regular supply of materials with high levels of foreign materials e.g. soil, will result in consultation with the supplier, if the issue persists the supplier or the product will no longer be permitted on site.

8 MONITORING MEASURES

Detailed baseline data can be found in ERM's AQA (Appendix H).

The air quality monitoring measures for site include:

8.1 Meteorological Station

A meteorological station as per EPL Condition O3.5 will be utilised to monitor conditions to enable improved fugitive dust control.

8.2 Dust Monitors

Two new mobile dust monitors as per EPL Condition M4 will be utilised to continuously monitor conditions during operational hours and assess site contribution to background fugitive dust levels. This automated system records incoming and outgoing fugitive dust levels therefore recording the sites or specific activity/equipment contribution to background levels.

Monitoring shall be done in conjunction with data supplied from the on-site meteorological station. This includes minimising fugitive emissions during adverse weather conditions. If weather conditions are likely to result in a heightened increase of fugitive emissions, activities will be assessed and where required rescheduled, reduced or ceased.

Records shall be kept for the testing of source emission points, they shall include the:

- Location of both monitors;
  - Upwind and downwind of activity/equipment being assessed.
- Duration of the test;
  - As required to determine contribution and/or prove mitigation strategies have reduced contribution.
  - In conducive weather and wind conditions, the test goal duration will be one hour.
- Frequency of testing.
  - Will be dependent upon the activity/equipment's contribution to the sites fugitive emissions. The greater the contribution the more frequent the testing.
  - Will be geared towards adverse weather conditions.

8.3 Inspectors

Each month there is a formal Site inspection conducted by the group environment manager. The inspections, amongst other objectives, are designed to;

- Ensure all reasonable and feasible measures are employed to minimise air emissions;
- Ensure compliance with conditions of the Project;
- Ensure any construction works are being carried out in accordance to the CEMP; and
- Ensure the development operations are being carried out in accordance to the AQMP.

This is achieved by inspecting amongst other items:

- Road surfaces for quality and dirt loading;

- Stockpiles for fugitive emissions;
- Fences for gaps;
- Dust screens for perforations;
- Unloading for fugitive emissions;
- Oxy-cutting operations;
- Shear operations;
- Hammermill operations; and
- Tyre wash.

Results of the inspections are recorded and kept on file.

8.4 Post-Commissioning Testing

The AQA by ERM is the baseline assessment for the Project.

As required by Condition B21, a Commissioning Report detailing the outcomes of the commissioning of the Emissions Collection System (ECS) for the hammer mill was submitted to the Secretary on 1 September 2016.

DPIE have approved the Hammermill ECS Commissioning Report prepared by ERM dated 18 October 2018. This report includes the final installation and design specifications for the ECS. The approval letter from DPIE is included at Appendix J.

9 CRITERIA EXCEEDANCE PROTOCOL

The GEM is responsible for criteria exceedance protocol checks. The GEM will inspect the dust monitoring data daily. Should there be a confirmed occurrence of an exceedance of an EPL air quality criteria then the below corrective actions or contingency measures are initiated.

9.1 Corrective Actions

When monitoring indicates that there is a potential for the 4 hour rolling average to breach criteria, corrective actions shall be instigated. Environmental corrective actions shall be the responsibility of GEM; it is their task to ensure:

- That the source/s of the exceedance are determined;
- That the issue is promptly addressed;
- Contingency measures, if required, shall be determined and put in place, such as;
  - water sprays/misters;
  - portable dust screens;
  - activity reduction; or
  - activity cessation
- If required, relevant regulating authorities will be notified;
- Where operations are reduced or ceased as a result of dust monitoring, legible records of the event shall be kept as per EPL Condition O3.6. These records are to include as a minimum;
  - date and time; and
  - activities reduced.
- When operations cease, they shall not recommence until they can be conducted without breaching the 4 hour rolling average criteria.

The GEM is responsible for:

- Ensuring that the internal data is in alignment with BOM data;
- Logging the issue so it will be discussed in the yearly review;
- Reviewing the relevant sections of the Blacktown Environment Management System (BEMS), to determine what improvements, if any, can be implemented;
- Providing feedback of the resolution process to a complainant if they have elected to be kept informed;
- Handling the event as per the exceedances process and the communication of the event as per the external audit process, when an exceedance is determined through an external audit; and
- Identifying and implementing any changes to the system that may be necessary to achieve the criteria.

9.2 Incident Management

All incidents and near misses are documented and recorded by the Group Safety Manager (GSM). All issues with an environmental aspect are recorded by the GEM in the environmental incident and near miss register. Incident data is presented during the yearly review. Negative trends will be investigated and root causes determined. Changes will be made to reduce determined root causes of incidents.

If an event or activity occurs that has, is likely to, or could potentially cause harm to the environment, whether that harm is on or off the premise, the emergency management procedure will be enacted as set out in Section 9.3 below.

9.3 Emergency Management

Environmental emergencies will enact the Pollution Incident Response Management Plan (PIRMP). The PIRMP has been updated to reflect the expansion of the Facility. It is available on the Sell & Parker web site, www.sellparker.com.au under 'About us', 'Links' and 'Environmental Reports'. If the PIRMP is enacted then the EPA and DPIE will be informed as will other regulatory authorities as outlined in the plan.

9.4 Investigations

Environmental incidents and high potential near misses will be scrutinised by the GEM to determine if an investigation is warranted. All proven exceedances will be investigated. When a formal environmental investigation is to be conducted, the GEM will be the lead investigator. Investigations shall be conducted as per the established procedure.

9.5 Reporting and Publishing of Results

All environmental statutory reporting will be conducted by the GEM in consultation with management. Information will be issued after formal approval from a director. All information is available on the Sell & Parker website www.sellparker.com.au, as per Condition 14 in the Original Approval.

10 COMPLAINTS HANDLING PROCEDURE

Complaints regarding air quality require immediate investigation and shall be conducted in the following steps:

- Confirm wind direction at time of complaint. If wind direction and complainant directions are not aligned no further investigation shall be conducted.

If wind direction and complainant direction are in alignment or not known:

- Conduct interviews with pertinent staff
- Review available CCTV footage
- Review details supplied by complainant
- Review any other available sources of information
- Activate corrective actions (if required)
- Record actions taken, where required a full report will be written.

Complaints are handled as outlined in the complaints handling procedure, are documented on the complaints handling form and recorded on the complaints handling register. The complaints register is available on the Sell & Parker website, www.sellparker.com.au.

Sell & Parker have a complaints phone number (02 8212 9561) as advertised next to the entry gate at 45 Tattersall Road. Complaints can also be registered through the Sell & Parker website www.sellparker.com.au, or by calling the Facility at 23-45 Tattersall Road, Kings Park on (02) 9621 2633.

11 AUDITS

11.1 Internal

Sell & Parker will conduct topic specific audits to validate that its systems are tracking and controlling environmental aspects that have a potential to cause non-conformances against its regulatory responsibilities. The GEM shall be responsible for audits.

11.2 External

Sell & Parker as per Condition C9 in the Original Approval, will conduct independent audits, conducted by a suitably qualified auditor, to assess the progress of the development against its consent conditions for the life of the consent. The auditor shall:

- be approved by the Secretary as per condition C9 (a) of the Original Approval;
- meet Condition C9 (b) of the consent; and
- audit against Conditions C9 (c), (d), (e) and (f) of the Original Approval.

The results of the audit will be presented to the Sell & Parker board and be available on the Sell & Parker website.

Within three (3) months of commissioning the audit, a copy of the report with Sell & Parker responses to any recommendations made will be provided to the Secretary.

12 AIR QUALITY ENVIRONMENTAL MANAGEMENT PLAN REVIEW

As per condition C12 of the Original Approval, a review of relevant sections of the EMS (including the AQMP where relevant) will be instigated:

- when conducting an annual review;
- after an incident that results in regulator notification;
- when conducting an external third party audit; and
- when modifying the consent.

A yearly review of the development including the environmental performance of the operations shall be presented at a Board Meeting. Issues to be discussed in the meeting include, but are not limited to, the items listed in Condition C11 of the Original Approval.

As part of Sell & Parkers continuous improvement commitment, to ensure compliance now and in the future, the CEMP will be revised as required to incorporate measures, protocols or procedures to improve the environmental performance of the Facility.

13 REVIEW OF PLANS

As per Condition C13 of the Original Approval, the operation of the Facility will be "undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary".

Should a modification to the Original Approval be approved, the relevant management plan/s will be updated and sent to the Secretary for approval.

Rev. No	Rev. Date	Revision Description	Prepared by	Approved By	Signed
A	February 2017	New document	MH	CM	MH
B	July 2017	Revised Site Layout	MH	CM	MH
C	October 2017	Revised Site Layout – LEC S96	MH	CM	MH
D	March 2018	Revised Site Layout	MH	CM	MH
E	September 2019	Changes associated with MOD 3	FM, SF	HR	HR

14 REFERENCES

Air Quality Assessment - September 2015
https://majorprojects.affinitylive.com/public/bd442c3126c1118b89efef536ab16144/Air%20Quality%20Assessment_September.pdf

Air Quality Health Risk Assessment - June 2015

https://majorprojects.affinitylive.com/public/dc7f2557481548ed8d4121f3ebb1b92a/Air%20Quality%20Health%20Risk%20Assessment.pdf

Kings Park Metal Recycling Development Consent - November 2015
https://majorprojects.affinitylive.com/public/3d00896d6ecd08883cd4e0f2afd6fcb1/02.%20Kings%20Park%20Metal%20Recycling%20Facility%20Consent%20Nov.pdf

Environmental Impact Statement - July 2014

https://majorprojects.affinitylive.com/public/69fbc15e8c830395c8d6bc462210af00/Annex%20I_Air%20Quality%20Report.pdf

APPENDIX A AMENDED SITE LAYOUT

APPENDIX B ENVIRONMENTAL POLICY

APPENDIX C ORIGINAL APPROVAL

APPENDIX D MOD 1

APPENDIX E MOD 2

APPENDIX F MOD 3

APPENDIX G EPA LICENCE

APPENDIX H ERM AIR QUALITY ASSESSMENT

APPENDIX I DPIE PLAN APPROVAL

APPENDIX J EMISSIONS COLLECTION SYSTEM REPORT DPIE APPROVAL

ARCADIS Design & Consultancy for natural and built assets