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24 February, 2015

Nigel Fox
Sell and Parker
11 Meadow Way
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Our Reference: *0226308L01 EPA RESPONSE TO SUBMISSIONS .DOCX*

Attention: **Nigel**

Dear Nigel,

RE: WASTE METAL RECOVERY, PROCESSING AND RECYCLING FACILITY EXPANSION- EPA RESPONSE TO SUBMISSIONS

1. INTRODUCTION

In its letter dated 16 February 2015 (DOC 15/49389) (refer *Annex A*), the Environmental Protection Authority (EPA) outlined a number of contributing factors pertaining to its refusal to grant general terms of approval for the proposed expansion of the waste metal recovery, processing and recycling facility. *Annex B* provides a response to the EPA's comments prepared by Environmental Resources Management Pty Ltd (ERM) on behalf of Sell and Parker (the Proponent). These relate to the EPA's concerns regarding: water balance and discharge; and air quality issues in relation to hammermill operations, oxy cutting, speciation of dust, dust and odour and best practise.

Yours sincerely,
for Environmental Resources Management Australia Pty Ltd

Chris Page
Project Manager

Murray Curtis
Partner

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Offices worldwide

Annex A

EPA LETTER

NSW EPA

ENVIRONMENT PROTECTION AUTHORITY

DOC15/49389

Mr Ashley Cheong
NSW Planning and Infrastructure
Industry, Key Sites and Social Projects
GPO Box 39
SYDNEY NSW 1232

BY ELECTRONIC MAIL

Dear Mr Cheong

Refusal to grant General Terms of Approval - Additional information required in EIS
Kings Park Waste Metal Recovery, Processing and Recycling Facility (SSD-5041)
23-43 and 45 Tattersall Road, Blacktown

I refer to Department of Planning and Environment's (DP&E) letter dated 26 March 2014 to the Environment Protection Authority requesting "General Terms of Approval" (GTAs) for the above development.

On 22 April 2014, the EPA provided comments to DP&E requiring that further information be included in the final Environmental Impact Statement (EIS) regarding potential air, noise and odour issues together with an assessment of the current operation of the hammermill. This information was requested because of the large number of complaints the EPA receives about the facility regarding dust, odour and smoke from the existing operation.

EPA held a meeting to discuss this and other air quality issues with the applicant on 15 September 2014. A supplementary report titled *ELM Air Pty Ltd report number N92746 – Emission testing report – Blacktown Plant* prepared by ERM was provided to the EPA on 28 September 2014.

However, the EIS placed on public exhibition on 27 August 2014 did not include all additional information required by the EPA in relation to potential air, noise and odour impacts.

On 20 October 2014, the EPA wrote to DP&E and noted that it was unable to grant General Terms of Approval until the additional information was provided and assessed.

On 19 January 2015, the EPA received further information from DP&E in response to the submissions prepared by ERM on 7 January 2015 (Document Reference 0226308L01).

The EPA has reviewed the response and considers it inadequate. The response does not include all additional information required by the EPA in relation to potential air and stormwater impacts. The EPA is therefore unable to grant GTAs until this additional information is provided and assessed. A detailed response and list of the information required is attached.

Should you have any further enquiries please contact Alex Bourne on 02 9995 5595.

Yours sincerely

16/2/15.

Jacqueline Ingham
Unit Head – Waste Compliance
ENVIRONMENT PROTECTION AUTHORITY

1. Water Balance/Discharge

In response to the EIS the EPA advised that the Proponent would need to investigate all practical alternatives to discharge and evidence must be provided on the assessment of the alternatives.

The Proponent has not done this. The EPA therefore advises that the Proponent needs to investigate all practical alternatives to discharge and evidence must be provided on the assessment of the alternatives.

The EPA notes that part 1.3.3 of the Soil and Water Management Plan identifies that the activities on-site have the potential to generate the following contaminants:

- sediment (mud tracking, contaminated imported material);
- oil, gasoline and diesel fuel;
- transmission fluid, power steering fluid and brake fluid;
- machinery lubricants and grease;
- battery acid and solvents;
- mercury;
- lead;
- CFCs and other refrigerants;
- asbestos from brake shoes and clutches;
- tyres;
- PCB from foam rubber, carpets and plastic components;
- metals, including aluminium, cadmium, copper, iron and zinc;
- plastics; and
- transmission and oil filters.

As no detailed water quality assessment has been submitted, the EPA has not been able to determine the impact of these potential contaminants and the necessary treatment measures required. At this stage, the EPA does not consider that the proposed installation of two oil/water separators would be adequate to treat the water prior to discharge due to the large range of contaminants of environmental concern.

Additionally the Soil and Water Management Plan recommends discharge criteria for only pH, Total Suspended Solids and Oil and Grease by observation. The EPA does not consider this adequate.

2. Air Quality

The proponent has submitted a response to submissions and a revised Air Quality Assessment ("AQA") addressing air quality issues raised by EPA.

A summary of the issues addressed by the proponent is as follows:

- Hammermill – the modelling has been revised to a correct location.
- Oxy cutting – sensitivity analysis of the oxy cutting source is provided in the AQA. Exceedances of NO_2, iron oxide fumes, manganese and copper dusts and mists have been predicted from oxy cutting at the nearby receptors.
- Speciation of dust – metal emissions from the hammermill have been considered in the revised AQA. It is unclear if cumulative assessment of oxy cutting and hammermill emissions has been presented in the results.
- Dust and odour – exceedances of dust and odour is predicted at the nearby industrial receptors.
- Best practice – water suppression has been proposed for reducing dust impacts. Mitigation measures should be clearly detailed in an air quality management plan.

The revised AQA has predicted exceedances of PM_{10}, odour and metals criteria at the nearby receptors. The proponent should investigate additional mitigation measures on site to achieve compliance with EPA criteria at the nearby receptors. A detailed discussion of EPA's review of the revised AQA is provided in **Attachment 1**.

Recommendation

The proponent should consider additional mitigation measures to achieve compliance with the criteria listed in the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW.* A recommended approach is provided in **Attachment 2**.

EPA is happy to meet with the proponent to discuss the response to submission, compliance with the Approved Methods criteria and Protection of Environmental Operation legislation.

ATTACHMENT 1

1. Hammermill

Issue: It is uncertain whether the location of the hammermill where odour monitoring was undertaken is the same as the wet scrubber stack in the modelling. Therefore, the wet scrubber stack specifications for volumetric flow rate and particulate emission concentration used in the modelling may not be appropriate.

ERM Response: The air quality modelling has been updated with the Wet Scrubber reclassified as a volume source and placed in the correct location which is adjacent to the Hammermill control room.

Considering the photographs of the wet scrubber during odour sampling, the wet scrubber on the hammermill vents into a cavity area of the hammermill before rising due to thermal buoyancy to the atmosphere. Consequently, it was considered on re-review of these photographs that a volume source more properly described this source.

EPA Response: A maximum dust concentration of 20 mg/m^3 and volumetric flowrate of 20,000 Nm^3/h from the hammermill was modelled. The revised modelling of the hammermill in the corrected location is considered to be more representative of the hammermill emissions.

2. Oxy Cutting

Issue: As discussed in the meeting with the Proponent, there are several methods for the modelling of emissions from oxy cutting. The existing modelling shows the oxy cutting as a 1 m high stack source with a very low velocity (0.01 m/s) and diameter (0.05 m). The results of the oxy cutting modelling indicate that the maximum concentration contours for 1-hour average NO_2, iron oxide fumes, manganese and copper dust appears to be on the adjacent site approximately 200 m west of the oxy cutting sources. The contours appear to go around the area where the oxy cutting source is located.

ERM Response: A comparative analysis of modelling using a point source or a volume source has been included in the updated report (see Annex D). The results of the sensitivity analysis demonstrated that there are minor differences in representing emissions as either a point or volume source with similar concentrations predicted in both circumstances. On balance, it was considered that representation as a point source provides a more conservative assessment and this approach was therefore adopted for the main report.

EPA Response: The sensitivity testing of modelling for oxy cutting appears to be adequate. The revised contours appear to have been corrected.

In accordance with Section 7.2 of the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW* (Approved Methods), the criteria for iron oxide fumes, manganese and copper dusts and mists is applied at and beyond the boundary of the site. The predicted incremental impact for iron oxide fumes, manganese and copper dusts and mists from oxy cutting is well above their respective EPA criteria at the nearby industrial receptors. It is also noted that the predicted iron oxide concentration at the residential receptors 1 to 3 range from 79.65 to 90.86 $\mu g/m^3$, close to and above the EPA criterion of 90 $\mu g/m^3$.

The predicted cumulative 1-hour average NO_2 concentration exceeds the EPA criterion of 246 $\mu g/m^3$ at the nearby industrial receptors.

The land use surrounding the site is business park, light industrial and general industrial. The general population which may visit these surrounding land uses, in particular the business park to the south of the site, may include sensitive individuals. The Approved Methods defines sensitive receptors as "*a location where people are likely to work or reside; this may include a dwelling, school, hospital, office or public recreational area*". Therefore, the criteria set out in the Approved Methods should be applied to the site and the proposed expansion.

3. Speciation of Dust

Issue: There is potential for other pollutants to be emitted in the hammermill during the shredding process. For example, the US EPA provides speciation data for $PM_{2.5}$ for auto body shredding which includes iron, lead, chromium, zinc, chlorine, copper and magnesium and manganese.

ERM Response: In addition to the dominant air species emissions of particulates, the wet scrubber vent emits other toxic air pollutants (metals) at a much smaller rate associated with $PM_{2.5}$ emissions. $PM_{2.5}$ emissions were considered to be 32% of PM_{10} emissions in accordance with the speciation provided in AP42. The typical list of metals emitted from a hammermill (as a mass percentage of $PM_{2.5}$) was obtained from the USEPA Speciate Data Browser (for Auto Body Shredding – Composite) (USEPA, 2009), for the metals which have a corresponding assessment criteria (Table 3.1) under the Approved Methods were included in the AQA.

EPA Response: The proponent has considered chromium, copper, lead, magnesium and manganese emissions from the hammermill as part of the AQA. It is noted that iron had the highest percentage by weight speciation in the US EPA auto body shredding database but was not included in the assessment for metals from the hammermill. It is unclear if metal impacts from the hammermill have been considered cumulatively with impacts from oxy cutting.

4. Dust and Odour

Issues: The predicted project 24-hour average PM_{10} concentration exceeds 50 $\mu g/m^3$ at the adjacent Pick and Payless facility, which have been the source of several verified odour, dust and smoke complaints about current Sell and Parker operations.

It is stated that the proposed increase in throughput capacity will result in decreased particulates emissions due to effective dust control measures and operational efficiencies. However, no quantitative assessment of particulates from current operations has been conducted which would provide a means of objectively assessing the potential change in impact from existing site activities to the proposed expansion.

ERM Response: ERM has revised the modelling to account for mitigation of dust emissions from materials handling, receipt of materials and stockpiles through the use of water sprays. Sell & Parker have committed to this mitigation measure. Rather than model the current situation for dust generation which would be an unusual step, ERM has undertaken a Best Available Technology (BAT) analysis in comparison to the proposed operation.

ERM consider the facility will adopt industry best practice for their operations in order to reduce emissions to atmosphere. There are however, residual impacts to the immediate surrounding land use from odour and dust. The surrounding land use is industrial in nature and whilst the Approved Methods considers a place of work as a Sensitive Receptor it is considered that an industrial estate should not be considered in the same light as a residence or a school.

Moreover, ERM consider that industrial uses do not have the same exposure profile as residential receptors, especially when it comes to PM_{10} or toxic air pollutants. It is considered more appropriate to use Safe Work Australia guideline values, where they exist for the emitted species, for these industrial areas.

EPA Response: The activities with water suppression control committed to by Sell & Parker and included in the modelling include: truck dumping and materials handling processes depicted as MH01 to MH11 (non-ferrous metal transfer to processing building, transfer points and ferrous metal loading to trucks). It is noted that the commitment for 70% efficiency for water suppression is not included in the revised table of mitigation measures. No mitigation measures have been applied to wind erosion from stockpiles or exposed conveyors.

There are exceedances of the 24-hour average PM_{10} criterion and peak odour criterion at other locations beyond the boundary of the site. The highest predicted 24-hour average PM_{10} concentration and peak odour impacts occur at the industrial receptor (R20) located adjacent to the western boundary. The maximum predicted odour impact is 9 OU at R20 which is 4 times the odour criterion of 2 OU. The cumulative 24-hour average PM_{10} assessment results showed that R20 is predicted to experience 23 additional exceedances over the five modelled years as a result of the site activities and ambient air quality. The maximum predicted incremental 24-hour average PM_{10} concentration at R20 is 48.66 $\mu g/m^3$.

Under Section 2.4.4 of the Approved Methods, if a premise does not comply with the impact assessment criteria, the assessment must be revised to incorporate additional control or mitigation

measures. In light of the results for dust and odour in the AQA and considering verified odour and dust complaints from existing operations, the proponent should consider additional control measures to reduce dust and odour impacts from the proposed expansion.

5. Best Practice

Issues: EPA considers that key performance indicators to determine the effectiveness of control measures, are an integral component of managing emissions from activities at an industrial site. The development and implementation of an Air Quality Management Plan (AQMP) can assist industries in setting key performance indicators and to manage air quality impacts. EPA recommends that a comprehensive best practice AQMP needs to be prepared for the site.

ERM Response: ERM has identified all emission points on-site within the air quality assessment. ERM has also updated the air quality assessment to provide a Best Available Technology assessment of the proposal. This assessment may be found in Section 6 of the Air Quality report, which addresses EPA's concerns. Further, it is considered unreasonable that an AQMP be prepared prior to consent. Upon approval of the Project, Sell and Parker are committed to preparing a comprehensive AQMP, drawing on the mitigation measures outlined in the benchmarking study (refer Table 6.1 of the revised report) to form the basis of the management plan.

EPA Comment: The site is currently in operation and should have management measures in place to manage air quality emissions. The proponent has proposed additional mitigation measures such as dust suppression to reduce particulate emissions from the site. These operational measures should be incorporated into existing mitigation measures and clearly detailed in an AQMP to demonstrate that the efficiencies assessed in the AQA can be achieved.

ATTACHMENT 2

Further Mitigation Measures

The AQA predicts exceedances of EPA criteria for odour, 24-hour average PM_{10} and 1-hour average manganese, iron oxide and copper at the nearby receptors. EPA considers the industrial area and business park surrounding the Sell and Parker facility to be sensitive receptors subjected to the criteria set out in the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW*.

In accordance with Section 128 of the *Protection of the Environment Operations Act* (POEO Act), the proponent must carry on any activity, or operate any plant, in or on the premise by such practicable means as may be necessary to prevent or minimise air pollution.

Further, under Section 129 of the POEO Act, a licensee must not cause or permit the emission of any offensive odour from the premises to which the licence applies. The predicted odour impacts indicate the proposed expansion may not comply with Section 129 of the POEO Act.

Based on the exceedances of the EPA criterion for incremental odour, iron oxide fumes, manganese, copper dusts and mists and cumulative 24-hour average PM_{10} and 1-hour average NO_2, the proponent should incorporate additional control measures for the processes on site. It is recommended that the proponent investigate the following:

1. Identify, quantify and justify existing measures that are being used to minimise particle, odour and other impacts (e.g. NO_2, iron, manganese and other metals):

    a. Estimate baseline emissions of particulates, odour and other emissions for both uncontrolled emissions (with no controls in place) and controlled emissions (with current controls in place).
    b. Rank the controlled emission estimates for particulates, odour and other emissions emitted by each activity from highest to lowest.
    c. Identify the top four activities that contribute the highest emissions of particulates, odour and other contaminants.

2. Identify, quantify and justify measures that could be used to minimise impacts:

    a. For each of the top four activities identified in Step 1(c) identify the measures that could be implemented to reduce impacts.
    b. For each of the top four activities identified in Step 1(c) estimate emissions of particulates, odour and other contaminants from each activity following the application of the measures identified in Step 2 (a).

3. Evaluate the practicability of implementing these mitigation measures:

    a. For each of the mitigation measures identified in Step 2(a), assess the practicability associated with their implementation, by taking into consideration:

        i. Implementation status;
        ii. Regulatory requirements;
        iii. Environmental impacts;
        iv. Safety implications; and
        v. Compatibility with current processes and proposed future developments.

    b. Air dispersion modelling to determine whether the proposed mitigation measures will achieve compliance with the EPA criteria for particulate, odour and other contaminant.

c. Identify those mitigation measures that will be implemented at the premises to reduce emissions.

4. For each of the mitigation measures identified as being practicable in step 3(b), provide a timeframe for their implementation.

Annex B

ERM RESPONSE TO EPA'S CONCERNS

EPA Comment	ERM Response
Water Balance and Discharge	
The EPA has raised their concern regarding the assessment of alternatives for water balance and discharge.	As outlined in the response to submissions report, there is currently sufficient capacity at the facility to reuse all water used during operations to avoid discharge into the adjacent Breakfast Creek. The Proponent does intend to eventually discharge treated wastewater into Breakfast Creek and is currently liaising with the EPA and working with ERM to establish an approved discharge water quality criteria. Once, agreed discharge criteria have been established, the Proponent intends to seek a modification to their existing Environment Protection Licence (EPL).
Hammermill Operations	
The EPA has confirmed that the revised modelling of the hammermill is considered to be more representative of hammermill emissions.	No further issue is identified by EPA in relation to the modelling of this source.
Oxy Cutting	
EPA considers that the modelling of the oxy-cutting has been undertaken correctly and that the predicted concentrations are realistic. EPA has raised their concern, however that:	
• Predicted concentrations of iron oxide fume, manganese and copper dusts / mists at nearby industrial receptors are above the respective impact assessment criteria contained in the Approved Methods.	As stated in the revised modelling report, the assessment criteria for iron oxide fume, manganese and copper dusts / mists contained in the Approved Methods were derived from those contained in the Victorian State Environment Protection Policy for Air Quality Management, 2001 (SEPP(AQM)). The criteria in the SEPP(AQM) for these species were in turn developed from criteria considered appropriate for an industrial setting with safety factors applied to adjust the criteria from applying in an industrial setting for locations where the population would be exposed 24 hours a day, 365 hours a day for an entire lifetime and where the population contained the very old and very young in comparison to a working population. Thus whilst it is agreed that the Approved Methods states that these criteria apply equally in all locations outside of the site boundary, the criteria themselves were derived for protection of a residential population rather than in an industrial setting and are therefore not appropriate for the receptors in the surrounding industrial estate. With the revised assessment ERM noted the exceedance of the criteria in the Approved Methods and considering the above derivation of the criteria additionally considered the criteria specified by Worksafe Australia as appropriate in an industrial setting. Predicted concentrations are substantially below the criteria considered as harmful to the working population by Worksafe Australia.

EPA Comment	ERM Response
• Predicted iron oxide concentrations at residential receptor 2 is 90.86 μg/m^3 in comparison to the criterion contained in the Approved Methods of 90 μg/m^3.	Whilst it is agreed that predicted iron oxide concentrations at Receptor 2 (a residential receptor) are above the criterion contained in the Approved Methods, it is considered that the modelled result is anomalous as it is the 100th percentile result for five years of modelled data. Thus the model predicted this exceedance for 1 hour out of 43,848 hours or 0.002% of the modelled time. Further, it is recognised within the industry that modelled results using a 1 hour average at the 100th percentile tend to over-estimate predicted concentrations. Consequently it is considered that the result at Receptor 2 will not occur in reality.
• Predicted nitrogen dioxide concentrations exceed the criterion contained in the Approved Methods of 246 μg/m^3 at nearby industrial receptors.	Predicted model results (ranging from 266.73 μg/m^3 to 381.08 μg/m^3) using the maximum measured background NO_2 concentration together with the maximum modelled site contribution to NO_2 indicates that concentrations at the industrial receptors will be above the criteria contained in the Approved Methods. Using a contemporaneous assessment considering the background concentration at the time the maximum predicted impacts shows that one predicted model result at one industrial receptor (receptor 17) in five years is likely to result in an exceedance of the standard. It is noted, however, that modelled results using a 1 hour average at the 100th percentile tend to over-estimate predicted concentrations. Consequently it is considered that the result at Receptor 17 will not occur in reality, and there would be no additional exceedances of the standard.
Speciation of Dust	
EPA has raised concern that not all of the metals specified in the US-EPA database SPECIATE have been modelled from the hammermill, specific attention is drawn to iron and that it is also unclear whether the metal impacts from the hammermill have been considered cumulatively with impacts from oxy cutting.	SPECIATE is a database that provides a breakdown compounds associated with emission sources. With respect to car shredding, SPECIATE provides a breakdown of elements within emitted particulate matter (PM2.5). In determining which species were included in the dispersion modelling, this list was compared with the criteria contained in the Approved Methods and only those species with criteria were assessed. According to SPECIATE the hammermill emits elemental iron in particulate form whilst in accordance with AP-42 (US-EPA emission factor database) iron oxy cutting emits iron oxide fume. Iron particulate is the same as iron oxide fume, consequently the two are not additive and have not been considered cumulatively. The Approved Methods does not provide a standard for elemental iron and consequently this has not been assessed from the hammermill.

Dust	
EPA is concerned that the water suppression for non-ferrous metal transfer to the processing building, transfer points and ferrous metal loading to trucks has not been included in the revised table of mitigation measures.	These mitigation measures were agreed by Sell & Parker and form part of the committed mitigation measures to be implemented at site.
EPA is also concerned that no mitigation measures have been applied to wind erosion from stockpiles or conveyors.	Wind erosion occurs when the wind speed is greater than 5.4 m/sec at the mean height of the source. Results of the meteorological modelling were considered and the wind speed adjusted for the mean height of the source from the modelled height of 10m using the power law approach. This approach showed that wind speed was above 5.4 m/sec at the source locations for 3% of the time. It was considered that this was not a significant source and therefore the expense of additional mitigation, which would be used only 3% of the time was not warranted as it would not make a significant difference to the overall impact.
EPA is further concerned that predicted concentrations of 24-hour PM10 concentrations were above the standard in the surrounding industrial area.	When using a contemporaneous assessment to determine the number of additional exceedances, it was determined that additional exceedances of the standard occurred only when background concentrations were elevated and site contribution was low (less than 2 μg/m3) to moderate (15.6 μg/m3). As stated in the revised assessment it is considered that an industrial area is less sensitive than a residential location as the working population is not present for the 24 hour averaging period, workers are generally considered to be healthier than the general population, and visitors to the industrial estate are present for a fraction of the 24 hour averaging period for PM10. Finally, it should be noted that the emission factors used in deriving the model were based on emission factors for the dumping and movement of overburden from mines, as no specific emission factors for metals recycling facilities have been developed. The emission estimates are therefore considered to be an over-estimate as the dust generated from overburden handling are likely to be significantly greater than handling of bulk or shredded metals. Consequently, it is considered that the results for particulate emissions are likely to be conservatively high and not realised in actual operation.

Odour	
EPA has raised concerns that maximum predicted odour concentrations at industrial receptors are 9 OU, which is above the odour criterion of 2.0 OU contained in the Approved Methods.	The Approved Methods sets odour criteria on the basis of surrounding population density, with lower density populations exposed to higher criteria as complaint is less likely to occur. EPA considers that the appropriate odour criteria is 2.0 OU, which is the criteria for an urban population of >2000. This criterion that was conservatively used in the assessment for all locations outside the site boundary, and it is noted that the predicted concentrations are compliant at all residential receptors, but that it is exceeded at two industrial receptors. It is considered that the purpose of industrial estates is to separate industrial use from sensitive residential uses to allow for residual emissions without impacting on amenity within sensitive land use areas. The application of the 2 OU criterion to industrial areas is therefore not considered appropriate. The Australian Bureau of Statistics provides population density for this area. The stated population density for the industrial estate in 2011 was 4.29 people per square kilometre (http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/1270.0.55.0072011?OpenDocument). Using equation 7.2 in the Approved Methods therefore gives a criteria for the industrial area of 6.4 OU, which may be rounded to 6 OU expressed at the 99th percentile. Model results indicate that concentrations at all industrial estate receptors, with the exception of receptor 20, are below this criterion. Receptor 20 is located immediately adjacent to the boundary of the site, and it is likely that this high concentration is an artefact of the model and the dispersion algorithms used, meaning that actual odour concentrations would be lower. This does not mean that odour will never be detectable at off-site locations, it means that it is considered to be at a level which is acceptable and expected within an industrial estate.

Best Practice	
EPA requests that further effort is made to reduce emissions to the surrounding environment in order to provide model results that are in compliance with the criteria contained in the Approved Methods.	Given the reasons discussed above with regard to model accuracy, it is considered that the additional time and effort required to implement EPA's request will result in a benefit in demonstrating compliance of model results on paper, but is not likely to result in a material benefit to the environment. For example, dispersion modelling for particulate matter has used emission estimates for overburden movement for mines. It is considered that these emission estimates are significantly higher than will occur in reality, however as more accurate emission factors exist those for overburden movement have been used as a proxy. Whilst additional expense can be made to put in place further mitigation measures and these can be remodelled to demonstrate compliance, an alternative approach would be to consider that actual emissions from metals handling are approximately 50% of those from overburden movement, this would achieve a model result demonstrating compliance for particulate matter. For impacts relating to oxy cutting, the purpose of the Approved Methods must be considered. The purpose is to protect the health and well-being of the surrounding population and the environment. Worksafe Australia criteria provide levels that are considered safe for the health and well-being of Australian employees. These criteria are not exceeded and therefore the purpose of the Approved Methods is achieved without the need for additional mitigation.