MOMENTUM M7 DEVELOPMENT

Construction Air Quality Management Plan - Stage 1

Prepared for:

Gazcorp Pty Ltd
Level 10, 60 Park St
Sydney NSW 2000

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BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Gazcorp Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

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DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
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1 Introduction

SLR Consulting Australia Pty Ltd (SLR) has been commissioned by Gazcorp Pty Ltd (Gazcorp) to prepare a Construction Air Quality Management Plan (CAQMP) for the Stage 1construction works to be undertaken as part of the Stage 1 development of a business hub to be located within the Western Sydney Employment Area (WSEA) at 813-913 Wallgrove Road, Horsley Park (the Development Site).

The aim of this CAQMP is to address potential air quality impacts on nearby sensitive receivers during the construction works. The Development Consent was granted for this Project on 11 November 2019. Development Consent has been granted as follows:

- Masterplan approval of 211,550 m^2 of GFA over 16 development lots, comprised of 198,300 m^2 of warehouse/industrial use and 13,250 m^2 of ancillary office floor space.
- Stage 1 Development Approval including:
  - Clearing of vegetation and bulk earthworks
  - Construction of internal estate roads with services utilities
  - Stormwater management
  - Landscaping
  - Construction and operation of Lot 10 (45,225 m^2 warehouse and 3,006 m^2 office space)
  - Intersection works on Wallgrove Road at the proposed southern link intersection.

This CAQMP is prepared for the stage 1 works which includes the earthworks for the whole Development Site and the construction and operation of Lot 10.

1.1 Objectives of the CAQMP

The objectives of this CAQMP are as follows:

- Maintain acceptable levels of amenity for surrounding receptors;
- Ensure compliance with relevant ambient air quality criteria for particulate matter and deposited dust at surrounding receptors;
- Maintain an effective response mechanism to deal with issues and complaints relating to dust emissions from the construction works;
- Outline air quality management commitments and responsibilities, including air quality compliance monitoring and reporting requirements; and
- Promote environmental awareness among employees and subcontractors.

2 Statutory Requirements

The Development Consent (SSD 5248) requirements stipulated for the construction of Stage 1 at the Development Site and where they have been addressed in this CAQMP are shown in **Table 1**.

Table 1 Assessment against SSD 5248 Conditions

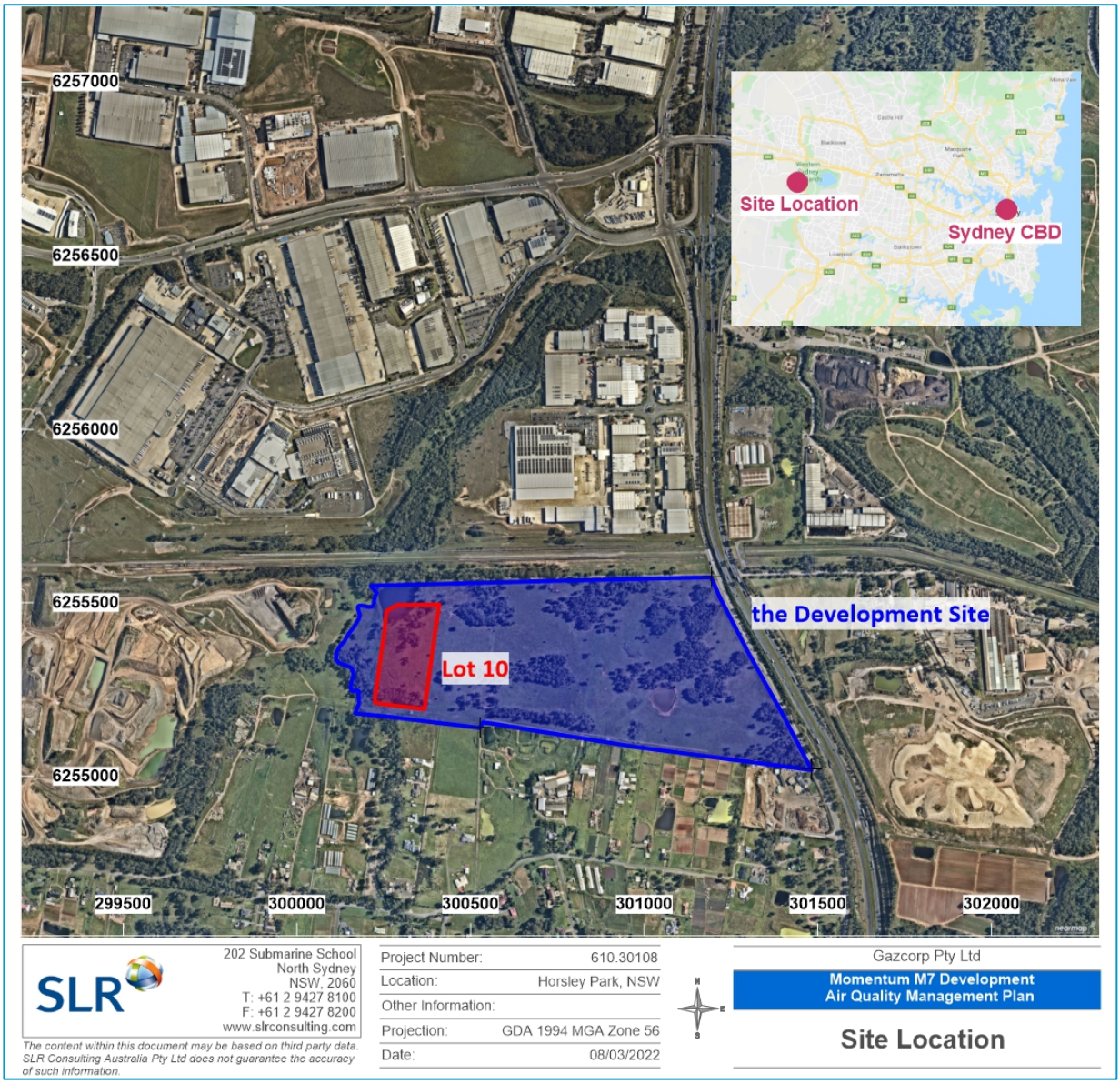
Conditions	Response / Section Reference
Dust Minimisation	
Condition C54	
The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	**Section 8**
Condition C55	
During construction, the applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the Site with loads have their loads covered; (c) trucks associated with the Development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	**Section 8**
Air Quality	
Condition C56	
Prior to commencement of construction works, the Applicant must prepare a Construction Air Quality Management Plan (CAQMP) to the satisfaction of the Planning Secretary. The CAQMP must form part of the CEMP required by Condition D2 and be prepared in accordance with Condition D1, the CAQMP must: (a) be prepared by a suitably qualified and experienced person(s)	2-page CV of the author is attached in **Appendix D**
(b) detail and rank all emissions from all sources of the Development, including particulate emissions	**Section 7**
(c) demonstrate compliance with the Protection of the Environment Operations Act 1997 (NSW) and its associated regulations;	**Section 5**
(d) demonstrate that no offensive odours would be detectable beyond the boundary of the premises;	**Section 9**
(e) identify the control measures that will be implemented throughout construction works;	**Section 8**
(f) describe measures to identify non-compliance and strategic measures to manage any non-compliance; and	**Section 11**
(g) describe proactive and reactive management strategies.	**Section 11**

3 Project Overview

3.1 Site Location

The proposed development is located at 813-913 Wallgrove Road, Horsley Park, which is approximately 33 kilometres (km) west-northwest from the Sydney CBD and covers an area of approximately 52.2 hectares (ha). The local setting of the Development Site is shown in **Figure 1**.

Figure 1 Regional Locality

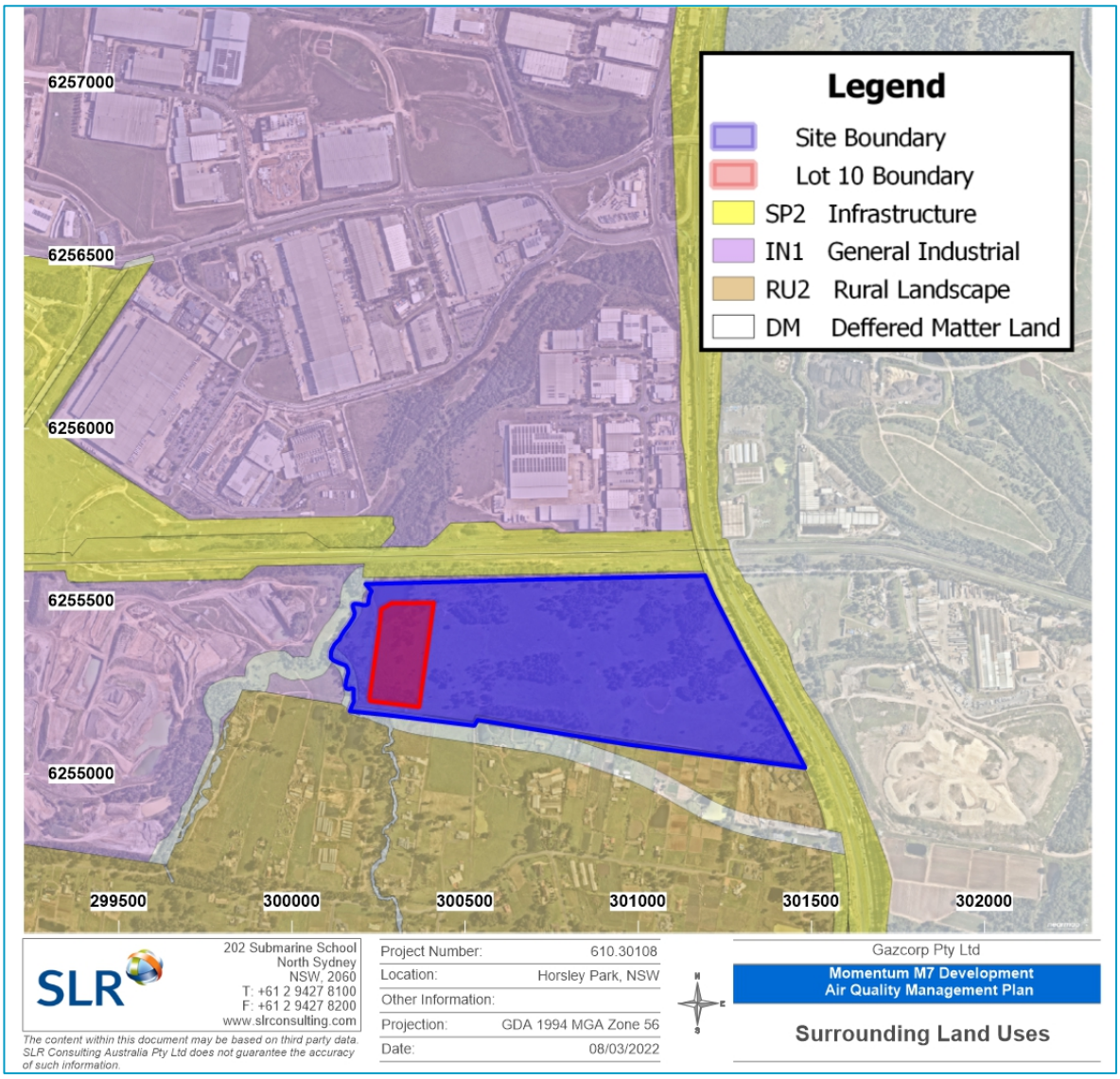


3.2 Surrounding Land Uses

As shown in **Figure 2**, adjacent areas to the west and north of the Development Site are zoned as general industrial. The nearest commercial receptors are located approximately 30 m to the south and 120 m to the north of the Development Site boundary while amenities (such as office buildings or workshops) within this zone, where individuals are likely to experience air quality impacts due to Stage 1 construction activities at the Development Site, are located approximately 300 m to the northeast and more than 350 m from the eastern and western boundaries of the Stage 1 construction areas.

The closest residential receptors to the Stage 1 construction areas are located to the south of the Development Site along Burley Road and Flavex Lane, with the nearest residence located approximately 140 meters (m) from the southern boundary of the Development Site. The nearest commercial receptors are located approximately 30 m to the south and 120 m to the north of the Stage 1 construction areas.

Figure 2 Surrounding Land Uses



Deferred matter land is land that has not yet been zoned in accordance with the Standard Instrument - Principle Local Environmental Plan.

3.3 Site Layout

The proposed layout of the Development Site, and the location of Lot 10 in the westernmost portion of the site, is shown in **Figure 3**.

Figure 3 Indicative Site Layout of the Development Site

3.4 Construction Activities

The Stage 1 construction activities at the Development Site are scheduled to commence in October 2022 and will extend until December 2023. The construction activities will be staged and are summarised in **Table 2**.

Table 2 Construction Staging and Activities – Stage 1

Milestone	Estimated Commencement	Planned Completion
Construction commencement	August 2022	
Earth works/civils	September 2022	November 2023
External road works	August 2022	November 2023

Construction hours will be in accordance with Conditions D57 and D58 of Development Consent SSD 5248, which are reproduced below:

*C57. The Applicant must comply with the hours detailed **Table 5**, unless otherwise agreed in writing by the Planning Secretary.*

Table 5: *Hours of Work*

Activity	Day	Time
Earthworks and Construction	Monday - Friday	7 am – 6 pm
	Saturday	8 am – 1 pm
	Sundays or Public Holidays	No work is permitted
Operation	Monday - Sunday	24 hours

C58. Works outside of the hours identified in Condition C57 may be undertaken in the following circumstances:

(a) Works that are inaudible at the nearest sensitive receivers;

(b) For the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or

(c) Where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.

The approved construction hours will be provided to all staff and contractors in their inductions. The movements of staff and contractors will be recorded for this project.

3.5 Construction Site Access

Access to the Development Site will be in accordance with the approved CTMP via Wallgrove Road.

4 Potential Sources of Air Emissions

The Air Quality Impact Assessment (AQIA) for the construction and operation of the Development Site was prepared by SLR in October 2021 (SLR 2021). As stated in the AQIA, the main emissions to air during the construction phase will be emissions of particulate matter (as TSP, PM_{10} and $PM_{2.5}$) and nuisance dust from the movement of vehicles and construction equipment, excavation and rehabilitation, demolition, clearing and grading, truck loading and unloading and wind erosion.

During the Stage 1 construction works, he key potential sources of dust have been identified as:

- Dust emissions from earthworks activities (e.g. excavation and loading of soils to trucks);
- Wind-generated dust from disturbed surfaces and stockpiles;
- Wheel-generated dust and particulate matter emissions in diesel exhaust emissions from on-site plant and equipment and construction traffic movements; and
- Particulate matter associated with exhaust emissions from increased/congested traffic emissions due to road closures or diversions.

In addition to the construction activities being carried out at any point in time, a number of other environmental factors may also affect the generation and dispersion of dust emissions, including:

- Wind direction - determines whether dust and suspended particles are transported in the direction of the sensitive receptors;
- Wind speed - governs the potential suspension and drift resistance of particles;
- Surface type - more erodible surface material types have an increased soil or dust erosion potential;
- Surface material moisture - increased surface material moisture reduces soil or dust erosion potential;
- Other external factors such as current works being undertaken by others outside of the defined Project boundaries and current climatic (dry) weather conditions;
- Rainfall or dew - rainfall or heavy dew that wets the surface of the soil reduces the risk of dust generation.

Potential air quality impacts associated with the proposed Stage 1 construction works, and the relative risk ratings, are addressed in **Section 7**.

5 Relevant Pollutants and Air Quality Criteria

5.1 Pollutants of Concern

As identified in **Section 4**, potential air pollutants of interest for the Stage 1 construction activities are considered to be both:

- Suspended particulate matter; and
- Deposited dust.

The following sections outline the potential health and amenity issues associated with the above pollutants, while **Section 5.2** outlines relevant air quality assessment criteria.

5.1.1 Suspended Particulate Matter

Airborne contaminants that can be inhaled directly into the lungs can be classified on the basis of their physical properties as gases, vapours or particulate matter. In common usage, the terms "dust" and "particulates" are often used interchangeably. The health effects of particulate matter are strongly influenced by the size of the airborne particles. Smaller particles can penetrate further into the respiratory tract, with the smallest particles having a greater impact on human health as they penetrate to the gas exchange areas of the lungs. Larger particles primarily cause nuisance associated with coarse particles settling on surfaces.

The term "total particulate matter" (TSP) refers to a category of airborne particles, typically less than 30 microns (µm) in diameter. Particulate matter with an aerodynamic diameter of 10 microns or less is referred to as PM_{10}. The PM_{10} size fraction is sufficiently small to penetrate the large airways of the lungs, while $PM_{2.5}$ (2.5 microns or less) particulates are generally small enough to be drawn in and deposited into the deepest portions of the lungs. Potential adverse health impacts associated with exposure to PM_{10} and $PM_{2.5}$ include increased mortality from cardiovascular and respiratory diseases, chronic obstructive pulmonary disease and heart disease, and reduced lung capacity in asthmatic children. In an urban setting, the emission of $PM_{2.5}$ is primarily associated with vehicles exhausts resulting from the incomplete combustion of diesel.

5.1.2 Deposited Dust

Section 5.1.1 is concerned in large part with the health impacts of particulate matter. Nuisance impacts need also to be considered, mainly in relation to deposited dust. Dust can cause nuisance by settling on surfaces and possessions, affecting visibility and contaminating tank water supplies. High rates of dust deposition can also adversely affect vegetation by blanketing leaf surfaces.

5.2 Ambient Air Quality Criteria

There are no air quality criteria outlined within Development Consent SSD 5248, therefore the NSW EPA criteria have been adopted in **Table 3**.

State air quality guidelines specified by the NSW Environmental Protection Agency (EPA) for the pollutants identified in **Section 5.1** are published in the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (EPA 2017) (hereafter 'Approved Methods'). The ground level air quality impact assessment criteria listed in Section 7 of the Approved Methods have been established by NSW EPA to achieve appropriate environmental outcomes and to minimise associated risks to human health as published in the Approved Methods. They have been derived from a range of sources and are the defining ambient air quality criteria for NSW and are considered to be appropriate for use in this assessment.

A summary of the relevant impact assessment criteria for particulate matter is provided in **Table 3**. The relevant criterion for nuisance dust deposition is provided in **Table 3**. The rate of dust deposition is measured by means of a collection gauge, which catches the dust settling over a fixed surface area and over a period of about 30 days.

Table 3 NSW EPA Impact Assessment Criteria for Particulate Matter and Nuisance Dust

Pollutant	Averaging Period	Assessment Criteria ($\mu g/m^3$)
Particulate matter (PM_{10})	24-hours	50
	Annual	25
Particulate matter ($PM_{2.5}$)	24-hours	25
	Annual	8
Pollutant	**Averaging Period**	**Assessment Criteria (g/m^2/month)**
Deposited dust	Annual	2 (maximum increase in deposited dust level) 4 (maximum total deposited dust level)

Source: EPA 2017

5.3 Government Air Quality Toolkit

The NSW EPA has developed the Local Government Air Quality Toolkit (EPA 2018), in response to requests from local Council officers for information and guidance on the common air quality issues they manage. Guidance is available under Part 3 of the Local Government Air Quality Toolkit for Construction Sites, which lists the common sources of emissions, and mitigation and management measures to control airborne dust levels from construction sites, and has been consulted in the development of this CAQMP.

6 Existing Environment

6.1 Local Meteorology

The Bureau of Meteorology (BoM) maintains and publishes data from weather stations across Australia. The closest such station recording wind speed and wind direction data is the Horsley Park Automatic Weather Station (AWS) (Station ID 67119), located approximately 3.1 kilometres (km) southeast of the Development Site. The long term and short term seasonal wind roses and long term rainfall patterns observed at the Horsley Park AWS indicate that:

- Winds that would blow fugitive dust emissions from the demolition/construction works towards the nearest sensitive receptors located to the south of the proposed construction activities occur rarely during (less than 8%) of the time.
- The long term wind and rainfall patterns suggest that construction activities at the Development Site have the greatest potential to impact on surrounding sensitive receptors during the months of May (autumn), and July (winter) to September (spring).

Full analysis of the wind roses and rainfall can be found in **Appendix A**.

6.2 Background Air Quality

Air quality monitoring is performed by the NSW Office of Environment and Heritage (OEH) at a number of monitoring stations across NSW. The closest such station with data for the last five years is the Prospect Air Quality Monitoring Station (AQMS), which is located approximately 6.5 km to the northeast of the Development Site. Considering the relatively flat terrain between the Development Site and Prospect AQMS, as well as similar land use surrounding both locations, it is assumed that the air quality monitoring data recorded at the AQMS is a reasonable representation of the air quality experienced at the Development Site. The following relevant air pollutants are monitored at this station:

- Fine particles as PM_{10}; and
- Fine particles as $PM_{2.5}$.

A summary of the PM_{10} concentrations for the last five years (2017-2021) is tabulated in **Table 4** and presented graphically in **Figure 4** and **Figure 5**.

Table 4 Summary of PM_{10} Monitoring Data at Prospect AQMS (2017 – 2021)

Year	PM_{10} (µg/m³)		$PM_{2.5}$ (µg/m³)	
	24-hour	Annual	24-hour	Annual
2017	61.1	18.9	30.1	7.7
2018	113.3	21.9	47.5	8.5
2019	182.8	26.0	134.1	11.9
2020	245.8	20.2	70.8	8.6
2021	44.6	17.2	37.3	6.9
Criterion	**50**	**25**	**25**	**8**

Figure 4 Measured 24-Hour Average PM_{10} Concentrations at Prospect AQMS (2017 – 2021)

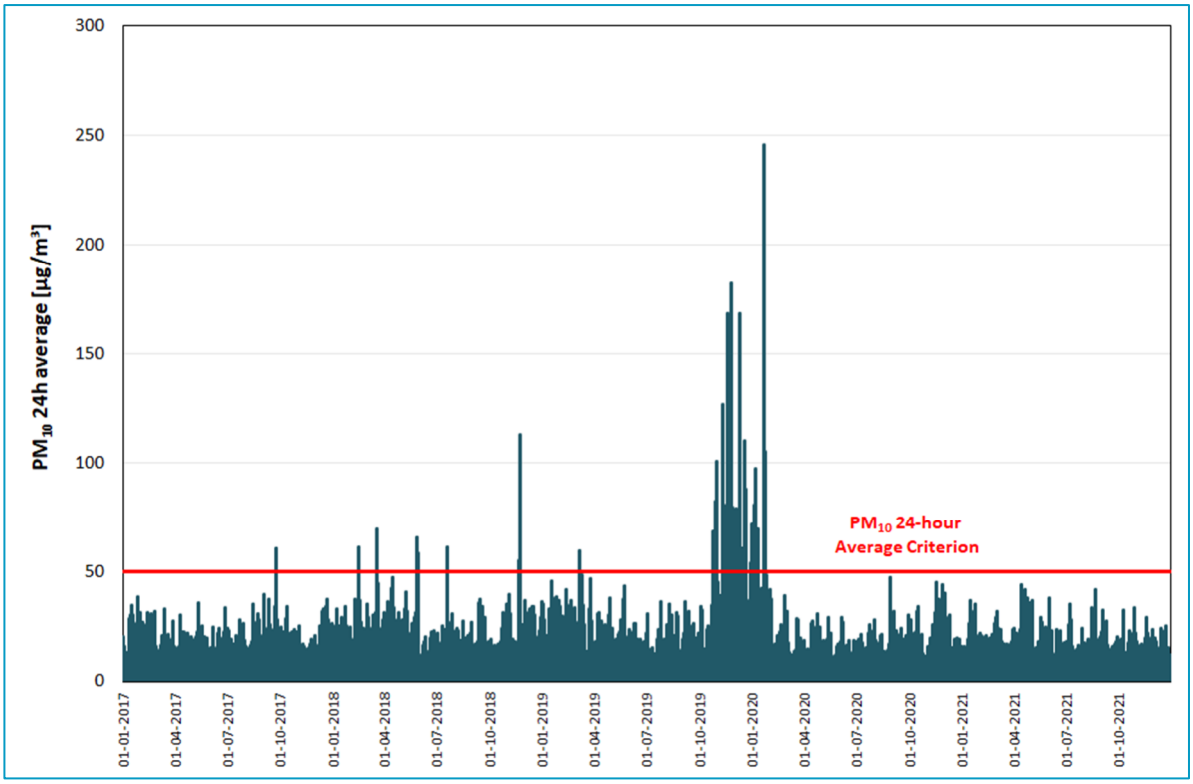
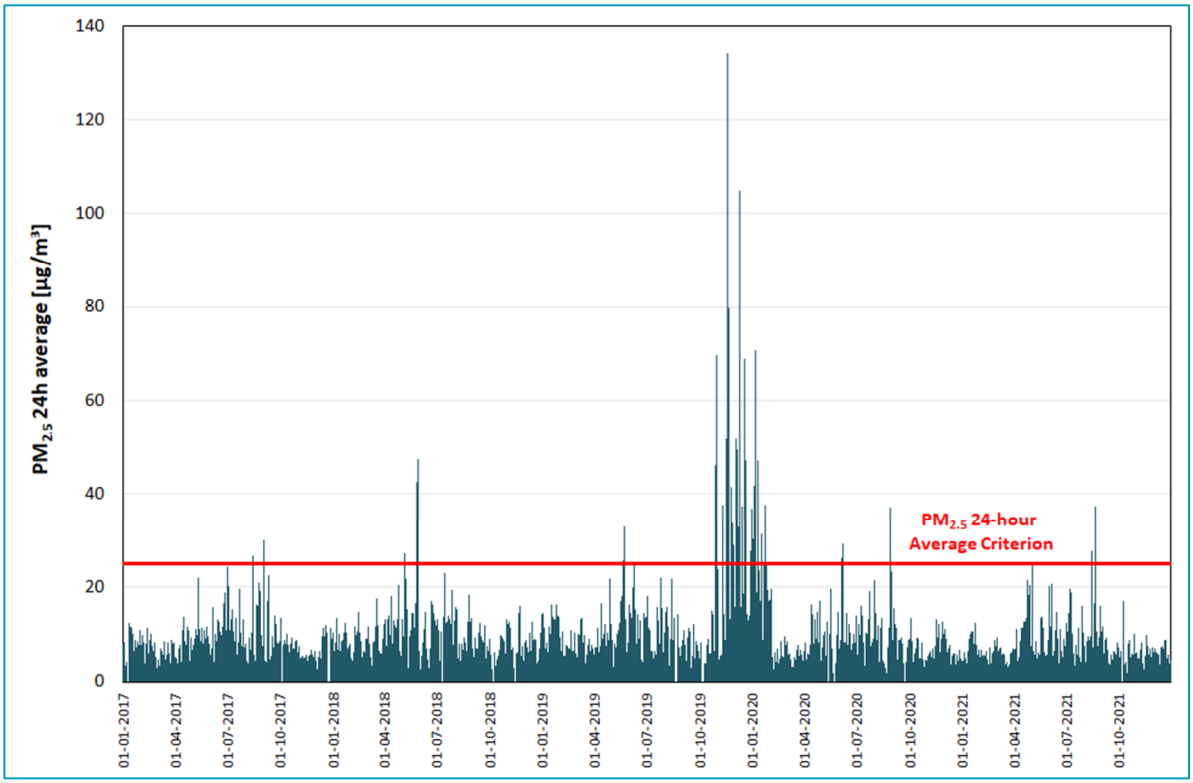


Figure 5 Measured 24-Hour Average $PM_{2.5}$ Concentrations at Prospect AQMS (2017 – 2021)



A review of the ambient air quality data presented in **Table 4**, **Figure 4**, and **Figure 5** shows that generally, the 24-hour average PM_{10} and $PM_{2.5}$ concentrations recorded by the Prospect AQMS are below the relevant 24-hour average guidelines, however isolated exceedances (normally on less than ten days per year) have been recorded in most years. The exception to this was the November 2019 to January 2020 period, when unprecedented and extensive bushfires within NSW resulted in an extended period of very elevated particulate concentrations across Sydney that were significantly above the 24-hour average guidelines. A review of the available compliance monitoring reports indicates that the intermittent exceedance days recorded during the other years were also primarily due to exceptional events such as bushfire emergencies, dust storms and hazard reduction burns.

In summary, the Prospect AQMS data show that background particulate levels in Sydney can be elevated at times. Effective dust mitigation measures therefore need to be implemented during the Stage 1 construction works so that the activities do not contribute to any additional exceedances of air quality criteria in the surrounding area.

7 Assessment of Dust Emissions during Construction

Potential impacts of dust emissions associated with proposed demolition and construction activities at the Development Site was performed in the AQIA (SLR, 2021) based on the methodology outlined in the Institute of Air Quality Management (UK) (IAQM) document, "*Assessment of dust from demolition and construction*" (Holman et al 2014). This guidance document provides a structured approach for classifying construction sites according to the risk of air quality impacts, to identify relevant mitigation measures appropriate to the risk (see **Appendix B** for full methodology).

The IAQM approach has been used widely in Australia for the assessment of air quality impacts from construction projects and the identification of appropriate mitigation measures, which has been accepted by regulators across all states and territories for a variety of construction projects.

The IAQM method uses a four-step process for assessing dust impacts from construction activities:

- **Step 1**: Screening based on distance to the nearest sensitive receptor; whereby the sensitivity to dust deposition and human health impacts of the identified sensitive receptors is determined.
- **Step 2**: Assess risk of dust effects from activities based on:
  - the scale and nature of the works, which determines the potential dust emission magnitude; and
  - the sensitivity of the area surrounding dust-generating activities.
- **Step 3**: Determine site-specific mitigation for remaining activities with greater than negligible effects.
- **Step 4**: Assess significance of remaining activities after management measures have been considered.

7.1 Risk Assessment – Stage 1 Works

Table 5 presents the preliminary risk of air quality impacts from uncontrolled construction activities during the Stage 1 works derived using the risk matrix provided in **Table B4** in **Appendix B**, based on the identified receptor sensitivity and sensitivity of the area. No significant demolition activities are proposed as part of the Stage 1 works, hence the risk of dust impacts from demolition activities have not been assessed.

Table 5 Preliminary Risk of Air Quality Impacts from Construction Activities (Uncontrolled)

Type of Receptor	Impact	Sensitivity of Area	Dust Emission Magnitude			Preliminary Risk		
			Earthworks	Construction	Trackout	Earthworks	Construction	Trackout
Residential	Dust Soiling	Low	Large	Medium	Large	Low Risk	Low Risk	Low Risk
	Human Health	Low				Low Risk	Low Risk	Low Risk

The results indicate that there is a low risk of adverse dust soiling and a low risk of human health impacts occurring at the off-site sensitive receptor locations even if no mitigation measures were to be applied to control emissions during the works.

Based on the dust emission magnitudes and the preliminary risk from these activities, the activities are ranked as (highest risk to lowest risk):

1. Earthworks
2. Construction
3. Track out

For almost all construction activity, the IAQM Methods notes that the aim should be to prevent significant effects on receptors through the use of effective mitigation, and experience shows that this is generally possible.

8 Mitigation Measures

As per **Section 7.1**, construction works at the Development Site pose a *low risk* to neighbouring sensitive receptors during earthworks, construction, and trackout phases. Nonetheless, in accordance with best practice construction methodology, and minimise potential for cumulative impacts on local air quality during periods of high background concentrations, a range of dust mitigation measures will be implemented during the Stage 1 works to minimise dust emissions.

Table 6 lists the mitigation measures to be adopted during the Stage 1 construction works.

Table 6 Site-Specific Management Measures Recommended by the IAQM

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Communications			
The Community Communications Strategy will be implemented.	Communications and Community Liaison Representative	Prior to commencing construction and ongoing	Best practice
The name and contact details of person(s) accountable for air quality and dust issues will be displayed on the site boundary. This may be the Contractor's Project Manager.	Construction Contractor		
The head or regional office contact information will be displayed on site signage.			
Site Management			
All dust and air quality incidents will be undertaken as per **Section 9** of this CAQMP.	Construction Contractor	Ongoing	**Section 9** of this document
All dust and air quality complaints will be undertaken as per **Section 9** of this CAQMP.			
Where excessive dust events occur (i.e. prolonged visual dust in a particular area), additional watering of dust producing activities will be undertaken or activities temporarily halted until such times that the dust source is under control.		During excessive dust events	Best practice
Horsley Park Bureau of Meteorology station weather forecast will be reviewed daily (i.e. wind, rain) to inform site dust management procedures for the day.		Daily	
Preparing and Maintaining the Site			
All reasonable steps to minimise dust generated will be undertaken during construction.	Construction Contractor	Ongoing	SSD 5248 Condition C54
Exposed surfaces and stockpile will be suppressed by regular watering or use of approved dust suppressants.			SSD 5248 Condition C55a
Land stabilisation works will be carried out in such a way on site to minimise exposed surfaces.			SSD 5248 Condition C55e
Dust generating activities in areas close to receptors will be closely monitored and additional mitigation applied as required to best manage potential dust emissions			Best practice

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Stockpiles that will be in place for more than 20 days and are not actively used as well as any stockpiles that are susceptible to wind or water erosion will be suitably protected from erosion within 10 days of the establishment of each stockpile. Temporary stabilisation of disturbed surfaces will be undertaken within two weeks of the stockpile being established.			
Site fencing and barriers will be kept clean using wet methods.			
Operating Vehicle/Machinery and Sustainable Travel			
Trucks associated with Stage 1 constructions will not track dirt off site and onto the public road network.	Construction Contractor	Ongoing	SSD 5248 Condition C55c
Project access roads used by delivery trucks will be kept clean.			SSD 5248 Condition C55d
All on-road vehicles will comply with relevant vehicle emission standards (prescribed by the NSW RMS), where applicable, and will be maintained in good condition, in accordance with manufacturer's specifications and POEO Act.			Best practice
Delivery trucks will switch off engines whilst undertaking a delivery on-site, if idling time is likely to exceed 5 minutes.			
Vehicle speed limit restrictions are implemented on site, including: • General - 20km/h • High risk area - 10km/h • Haul routes – 50 km/h			
Truck queuing and unnecessary trips will be minimised through logistical planning and by the identification and use of specific park up/hold areas away from the Project.			
Operations			
Only cutting, grinding or sawing equipment fitted with suitable dust suppression systems, such as water sprays will be used.	Construction Contractor	Ongoing	Best practice
Adequate water supply will be available on the site for effective dust/particulate matter suppression/ mitigation using a combination of potable and non-potable water sources.			
Water carts will be used on all denuded or exposed surfaces and unsealed roads to minimise dust emissions.	Construction Contractor	Ongoing	Best practice
Equipment, inclusive of, but not limited to Environmental spill kits will be readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.			

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Works will be assessed during strong winds or in weather conditions where high levels of airborne particulates may potentially impact the sensitive receivers. Continual monitoring of wind speed and direction will be undertaken to guide this decision and ensure that adequate mitigation measures are undertaken		Continuously and during high winds	
Waste Management			
All trucks entering or leaving the Site will have their loads covered.	Construction Contractor	Ongoing	SSD 5248 Condition C55b
No waste materials, timbers or any other combustible materials will be burnt on site.			Best practice
Earthworks			
Scopes of work will be planned in such a way to assist in minimising the duration that surfaces are left denuded	Construction Contractor	Ongoing	Best practice
Rehabilitation of disturbed surfaces will be undertaken within 20 days of final construction levels.		Within 20 days of final construction levels	
If unanticipated strong odours or significant visual dust emissions are noted or observed on site, an investigation will be undertaken by the construction contractor Project Manager to identify the scope of work or source of the emission prior to undertaking and applying any additional mitigation measures.		Ongoing	
Construction			
Sand and other aggregates will not be allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.	Construction Contractor	Ongoing	Best practice
Trackout			
Water-assisted road sweeper(s) will be used on an as required basis should any material be tracked out of the site.	Construction Contractor	Ongoing	Best practice
Record all regular inspections and maintenance undertaken of site haul routes and project related access roads in a site log book.			
A wheel washing system and/or cattle grid system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site) will be implemented.			
Demolition			
Ensure effective water suppression of dust is used during demolition operations.	Construction Contractor	Ongoing	Best practice
Bag and remove any biological debris or damp down such material before demolition.			

9 Complaints Handling and Response Procedure

All complaints will be handled in accordance with the sections below.

9.1.1 Performance Objective

To ensure that all environmental complaints in relation to the air emissions from the Stage 1 construction activities are promptly and effectively received, handled and addressed.

9.1.2 Responsibility

The Communications and Community Liaison Representative is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an environmental complaint. It should be ensured that all site employees are aware of and understand their obligations for complaints response.

All employees who take receipt of a complaint, either verbal or written, are to immediately notify the Contractor's Project Manager, who will then contact the Communications and Community Liaison Representative.

9.1.3 Complaints Handling Procedure

Upon becoming aware of a complaint, the protocol outlined below will be followed.

1. Record and Acknowledge

Any employee who take receipt of a complaint, either verbal or written, is to immediately notify the Contractor's Project Manager who will then contact the Communications and Community Liaison Representative. The Contractor's Project Manager will be available 24 hours a day, seven days a week and have the authority to stop or direct works.

In the normal course of events, the first contact for complaints will usually be made in person or by telephone.

The complainant's name, address and contact details, along with the nature of the complaint, must be requested. If the complainant refuses to supply the requested information, a note will be made on the form and complainant advised of this.

2. Assess and Prioritise

The Communications and Community Liaison Representative will prioritise all complaints by considering the seriousness of the complaint including risk to health and safety and will attempt to provide an immediate response via phone or email.

3. Investigate

A field investigation will be initiated in an attempt to confirm details relevant to the complaint and the cause of the problem. Any air quality monitoring information and/or site records at and around the time of the complaint will be reviewed for any abnormality or incident that may have resulted in the complaint.

4. Action or Rectify

Once the cause of the complaint has been established, every possible effort will be made to undertake appropriate action to rectify the cause of the complaint and mitigate any further impact. The Communications and Community Liaison Representative will assess whether the complaint is founded or unfounded and delegate the remediation of the issue to the Contractor's Project Manager for action, as required.

As outlined in **Section 11**, if a complaint regarding air quality impacts is concluded to be substantiated, the need for any changes to the air quality mitigation measures identified for the Project in **Section 8** and/or the air quality monitoring programme outlined in **Section 10** is to be reviewed and, the CAQMP updated as appropriate.

5. Respond to Complainant

The Communications and Community Liaison Representative and the Contract Superintendent will oversee the rectification of the issue. The Communications and Community Liaison representative will then respond to the complainant once the issue has been resolved. The complainant will be provided with a follow up verbal response on what action is proposed within two hours during night-time works (between the hours of 6:00 pm and 10:00 pm) and 24 hours at other times. Where a complaint cannot be resolved by the initial or follow-up verbal response, a written response will be provided to the complainant within ten days.

6. Record

It is imperative that an investigation of the situation is carried out and proposed improvements documented in order to minimise the potential for similar complaints in the future. On this basis, every complaint received is to be recorded in the Complaint Enquiry Form. A copy of the completed form will be maintained for at least five years. The complaint will also be recorded in the Complaints Register.

7. Preventative Action

Once the complaint has been suitably handled, proposed improvements will be investigated and implemented to minimise the potential of re-occurrence. The Complaint Enquiry Form will not be closed out until the preventative actions are completed and recorded on the form.

9.1.4 Complaints Register

A Complaints Register will be maintained during construction and will contain the following:

- A copy of the environmental complaint handling procedure;
- A separate reference sheet containing the contact details;
- Blank hard copies of the Complaint Enquiry Form; and

Copies of all completed Complaint Enquiry Forms, which are to be maintained for at least five years after the event to which they relate.

10 Proposed Air Quality Monitoring Program

As discussed in **Section 7**, the risk of construction dust emissions causing nuisance impacts at off-site sensitive receptor locations is concluded to be low. It is also noted that any impacts will be temporary and managed through the implementation of appropriate mitigation measures (see **Section 8**).

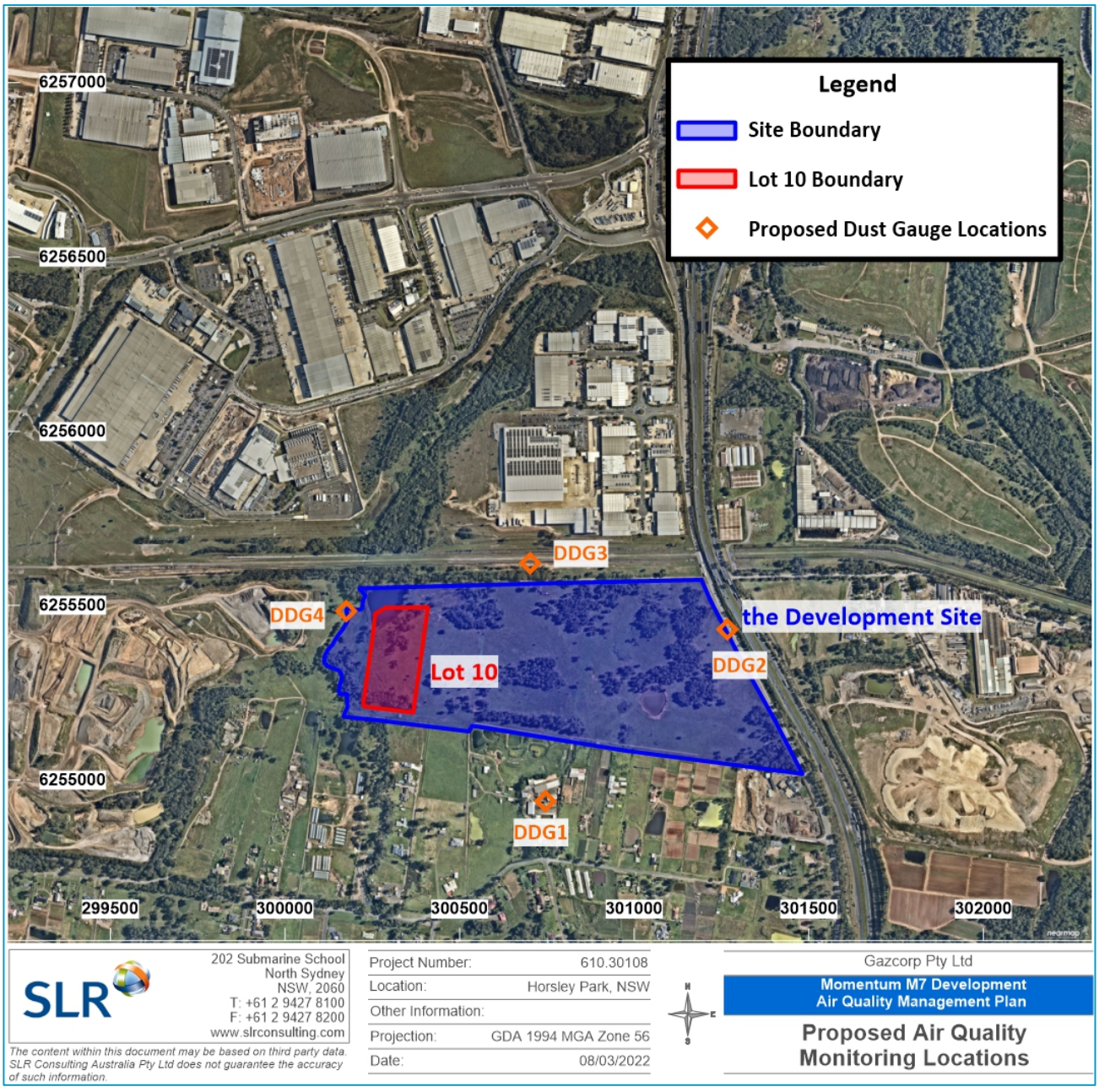
Air quality monitoring program is recommended to start 3 months prior to the start of stage 1 constructions to get a baseline regarding air quality in the vicinity of the Development Site. The dust gauges should be installed in compliance with the AS/NZS 3580.1.1:2016 and changed every 30 days. The results will be compared against NSW EPA criterion stated in **Section 5.2**. Furthermore, visually assessing the dust levels and the effectiveness of any dust controls that have been implemented, which may include engaging additional resources to reduce or mitigate the risk of dust leaving the site is recommended.

A summary of on-site air quality monitoring programme at the Development Site is shown in **Table 7**. The locations of these monitors are shown in **Figure 6**.

Table 7 Summary of On-Site Monitoring Programme

Pollutant	Equipment Used	Number of Monitoring Sites	Criterion (Averaging Period)
Deposited dust	Dust Deposition Gauges (DDGs)	4	4 g/m^2/month (annual average)

Figure 6 Air Quality Monitoring Locations for the Development Site



11 Contingency Management Plan

The air quality contingency management plan for the Stage 1 construction activities is shown in **Table 8**. As noted in **Section 10**, data from the ongoing monitoring program will be utilised to inform the appropriate contingency response for the Development.

Table 8 Air Quality Contingency Management Plan for the Construction of Momentum M7

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Visible dust leaving the site	Trigger	Daily inspections show that there is no visible dust leaving the site.	Daily inspections show that there is visible dust leaving the site.	Daily inspections show that there is visible dust leaving the site multiple times during a day OR from multiple locations within the site.
	Response	Continue monitoring program as normal.	Review and investigate construction activities and respective control measures. Where appropriate, implement additional remedial measures, such as: • *Deployment of additional water sprays, water trucks etc*	Undertake an investigation of the dust generating activities, and if necessary, temporarily halt the dust generating activities
Dust deposition reading of >4g/m^2/month	Trigger	Dust deposition rates are less than 4 g/m^2/month at all the dust gauges.	Dust deposition rate greater than 4 g/m^2/month is recorded by any of the dust gauges	Dust deposition rates greater than 4 g/m^2/month are recorded by two or more dust gauges for two months in a row.
	Response	Continue monitoring program as normal.	• Gazcorp Project Managers to analyse data to try to identify the source(s) of dust. • Construction Contractor to review operations to reduce dust emissions from the identified key source(s). Implement any additional mitigation measures as required, such as additional watering.	• Gazcorp Project Managers to review and investigate construction activities and respective control measures for the monitoring period. • If it is concluded that construction activities were directly responsible for the exceedance (i.e. the exceedance event was not caused due to high regional dust levels or local non-project dust source), Construction Contractor to submit an incident report to government agencies.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Complaints received regarding nuisance dust	Trigger	There are no complaints received during the construction	An air-quality related complaint is received from a nearby resident	Further complaints are received from the same complainant after the additional mitigation measures have been implemented
	Response	Continue monitoring program as normal.	• Report the complaint to the regulator, in line with complaints handling procedure (See **Section 9**). • Review and investigate construction activities and increase dust suppression measures (additional watering, covering stockpiles etc), where appropriate.	• Including real time monitors to measure PM_{10} and $PM_{2.5}$. • Review real-time monitoring data at the existing continuous monitors to investigate the likelihood of onsite activities contributing (see **Appendix C**).

12 Roles and Responsibilities

The key responsibilities specifically for dust management are as follows:

12.1 Contractor's Project Manager

- Ensuring appropriate resources/plant/personnel are available for the implementation of this CAQMP;
- Assessing data from inspections and providing project-wide advice to ensure consistent approach and outcomes are achieved;
- Providing necessary training for project personnel to cover air quality management;
- Reviewing and update of this CAQMP;
- Assessing and engaging (as required) additional mitigation controls to best manage the risks of elevated dust levels before commencing works each day and ensuring that the appropriate controls are implemented and effective;
- Reviewing weather forecasts daily and current observations of meteorological conditions (as recorded at Horsley Park AWS);
- Ceasing particular scopes of works as required in the event of excessive dust generation due to extreme weather conditions or inadequately controlled construction activities (eg high winds, surface dirt accumulation, etc.); and
- In the event that an air quality complaint is received, the procedure in **Section 9** of this CAQMP will be implemented.

12.2 Environmental Coordinator

- Undertaking dust monitoring program; and
- Review that control measures are working in accordance with the CAQMP.

12.3 All Workers on Site

- Observing any dust emission control instructions and procedures that apply to their work;
- Taking action to prevent or minimise dust emission incidents; and
- Identifying and reporting dust emission incidents.

13 Review and Improvement of the CAQMP

The review of the CAQMP will be undertaken at least quarterly and will include participation by Gazcorp. The review will comprise, as a minimum, the following:

- Identification of areas of opportunity for ongoing improved environmental performance;
- Analysis of the causes of any recorded non-compliances, including those identified in environment inspections and audits;
- Verification of the effectiveness of corrective and preventative actions; and
- Highlighting any changes in procedures resulting from process improvement.

This CAQMP will also be reviewed and, if necessary, revised in the following circumstances:

- Where there is any change to the scope of the construction activities and/or disturbance footprint;
- Where it is identified that the environmental performance is not meeting the objectives of the CAQMP;
- In the event of a substantiated complaint being received regarding air quality impacts; and/or
- At the request of a relevant regulatory authority.

14 References

- DPIE 2020, *NSW Air Quality Statement 2019*, available online at https://www.environment.nsw.gov.au/topics/air/air-quality-statement, accessed 15 May 2020.
- EPA 2017, *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*, Environment Protection Authority NSW, January 2017.
- EPA 2018, *Local Government Air Quality Toolkit, Module 3 – Guidelines for Managing Air Pollution, Part 3 – Guidance Notes for Construction Sites*, available online at https://www.epa.nsw.gov.au/your-environment/air/air-nsw-overview/local-government-air-quality-toolkit, accessed on 17 July 2018.
- Holman *et al* 2014, *IAQM Guidance on the assessment of dust from demolition and construction,* Institute of Air Quality Management, London. http://www.iaqm.co.uk/text/guidance/construction-dust-2014.pdf.
- SLR 2021, *Momentum M7 Development, Air Quality Impact Assessment*, v1.1 October 2021.
- Australian Standards / New Zealand Standards (AS/NZS) 3580.10.1:2016 "Methods for sample and analysis of ambient air – Determination of Particulates – Deposited Matter – Gravimetric method".
- AS/NZS 3580.1.1:2016 "Methods for sampling and analysis of ambient air Part 1.1: Guide to siting air monitoring equipment".

15 Feedback

At SLR, we are committed to delivering professional quality service to our clients. We are constantly looking for ways to improve the quality of our deliverables and our service to our clients. Client feedback is a valuable tool in helping us prioritise services and resources according to our client needs.

To achieve this, your feedback on the team's performance, deliverables and service are valuable and SLR welcome all feedback via https://www.slrconsulting.com/en/feedback. We recognise the value of your time and we will make a $10 donation to our 2022 Charity Partner – Lifeline, for every completed form.

APPENDIX A

WIND ROSES AND RAINFALL DATA ANALYSIS

Wind Conditions

Local wind speed and direction influence the dispersion of air pollutants. Wind speed determines both the distance of downwind transport and the rate of dilution as a result of 'plume' stretching. Wind direction, and the variability in wind direction, determines the general path pollutants will follow and the extent of crosswind spreading. Surface roughness (characterised by features such as the topography of the land and the presence of buildings, structures and trees) will also influence dispersion.

The Bureau of Meteorology (BoM) maintains and publishes data from weather stations across Australia. The closest such station recording wind speed and wind direction data is the Horsley Park Automatic Weather Station (AWS) (Station ID 67119), located approximately 3.1 kilometres (km) southeast of the Development Site. Considering the relatively flat terrain between the Development Site and Horsley Park AWS, it is considered reasonable to assume that the wind conditions recorded at the Horsley Park AWS are representative of the wind conditions experienced at the Development Site.

Annual wind roses for the years 2017 to 2021 compiled from data recorded by the Horsley Park AWS are presented in **Figure A1**, with seasonal wind roses for 2021 presented in **Figure A2**. Wind roses show the frequency of occurrence of winds by direction and strength. The bars correspond to the 16 compass points (degrees from North). The bar at the top of each wind rose diagram represents winds blowing from the north (i.e. northerly winds), and so on. The length of the bar represents the frequency of occurrence of winds from that direction, and the widths of the bar sections correspond to wind speed categories, the narrowest representing the lightest winds. Thus it is possible to visualise how often winds of a certain direction and strength occur over a long period, either for all hours of the day, or for particular periods during the day.

The 'Beaufort Wind Scale' (consistent with terminology used by the BoM) presented in **Table A1** was used to describe the wind speeds experienced at Oakdale West.

Table A1 Beaufort Wind Scale

Beaufort Scale #	Description	m/s	Description on land
0	Calm	0-0.5	Smoke rises vertically
1	Light air	0.5-1.5	Smoke drift indicates wind direction
2-3	Light/gentle breeze	1.5-5.3	Wind felt on face, leaves rustle, light flags extended, ordinary vanes moved by wind
4	Moderate winds	5.3-8.0	Raises dust and loose paper, small branches are moved
5	Fresh winds	8.0-10.8	Small trees in leaf begin to sway, crested wavelets form on inland waters
6	Strong winds	>10.8	Large branches in motion, whistling heard in telephone wires; umbrellas used with difficulty

Source: http://www.bom.gov.au/lam/glossary/beaufort.shtml

The annual wind rose (**Figure A1**) indicates that the predominant wind directions in the area are from the southwest. Calm wind conditions (wind speed less than 0.5 m/s) were recorded approximately 12% of the time throughout the five year period reviewed. The average seasonal wind roses for the years 2017-2021 indicate that:

- In summer, wind speeds ranged from calm to fresh winds (between 0.5 m/s and 9.8 m/s). The majority of winds originated from eastern and south eastern quadrants, with very few winds from westerly directions. Calm wind conditions were recorded approximately 10% of the time during summer.
- In autumn, wind speeds ranged from calm to fresh winds (between 0.5 m/s and 9.1 m/s). The majority of winds originated from the southwest quadrant, with very few winds from the northeast. Calm wind conditions were observed to occur approximately 12.5% of the time during autumn.
- In winter, wind speeds ranged from calm to fresh winds (between 0.5 m/s and 10.1 m/s). The majority of winds originated from the southwest quadrant, with very few winds from the east. Calm wind conditions were observed to occur approximately 13.5% of the time during winter.
- In spring, wind speeds ranged from calm to fresh winds (between 0.5 m/s and 9.9 m/s). The frequencies of winds were generally even from all directions. Calm wind conditions were observed to occur approximately 11% of the time during spring.

Wind erosion of dust from exposed surfaces (ie, during the construction phase of the development) is usually initiated when wind speeds exceed the threshold friction velocity for a given surface or material, however a general rule of thumb is that wind erosion can be expected to occur above 5 m/s (USEPA 2006). The frequency of wind speeds for the period of 2017-2021 is presented in **Figure A3**. The plot showed that the frequency of wind speeds exceeding 5 m/s for the period 2017-2021 at Horsley Park AWS was approximately 6%.

Figure A1 Annual and Seasonal Wind Roses for Horsley Park (2017 to 2021)

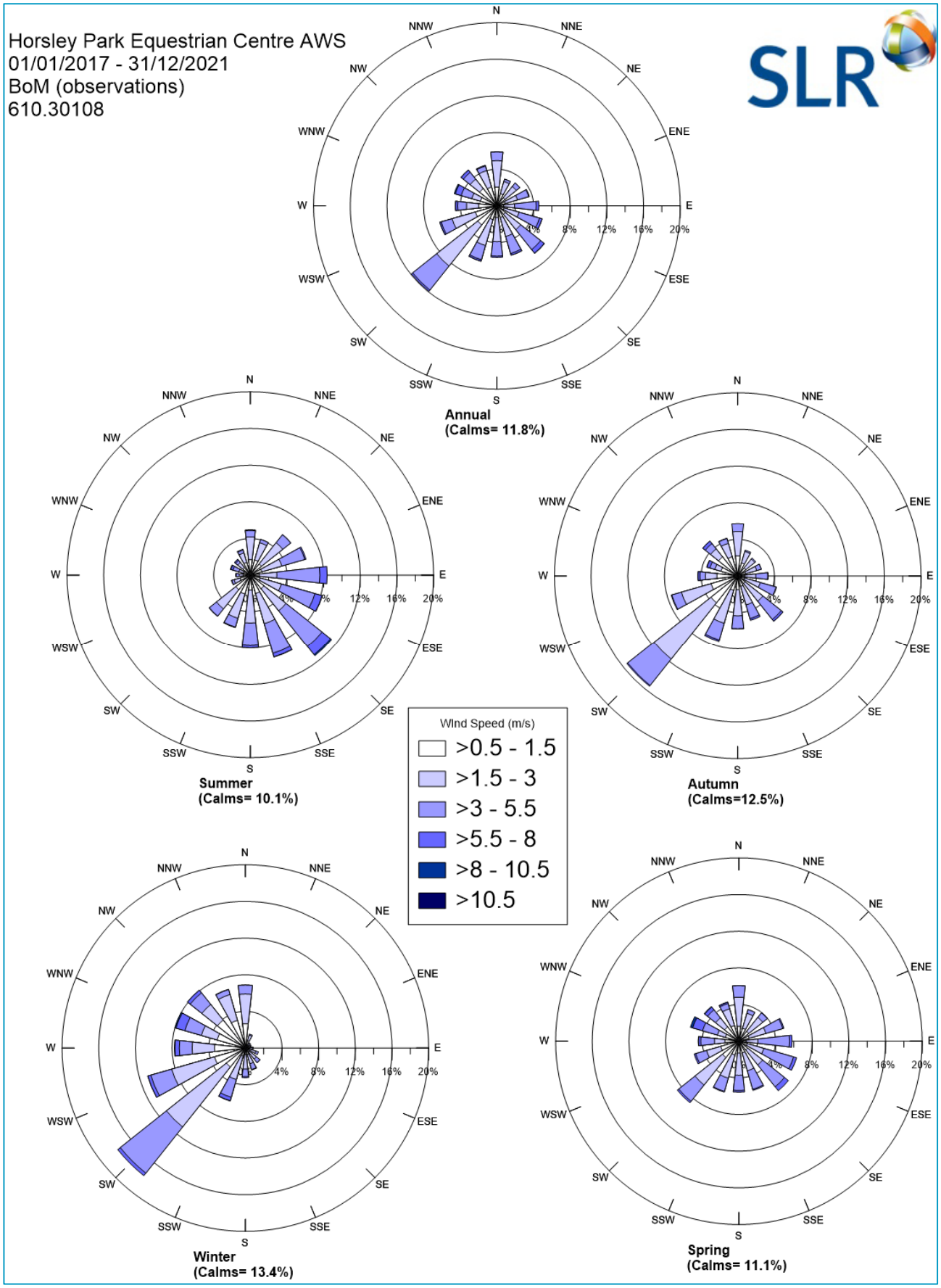
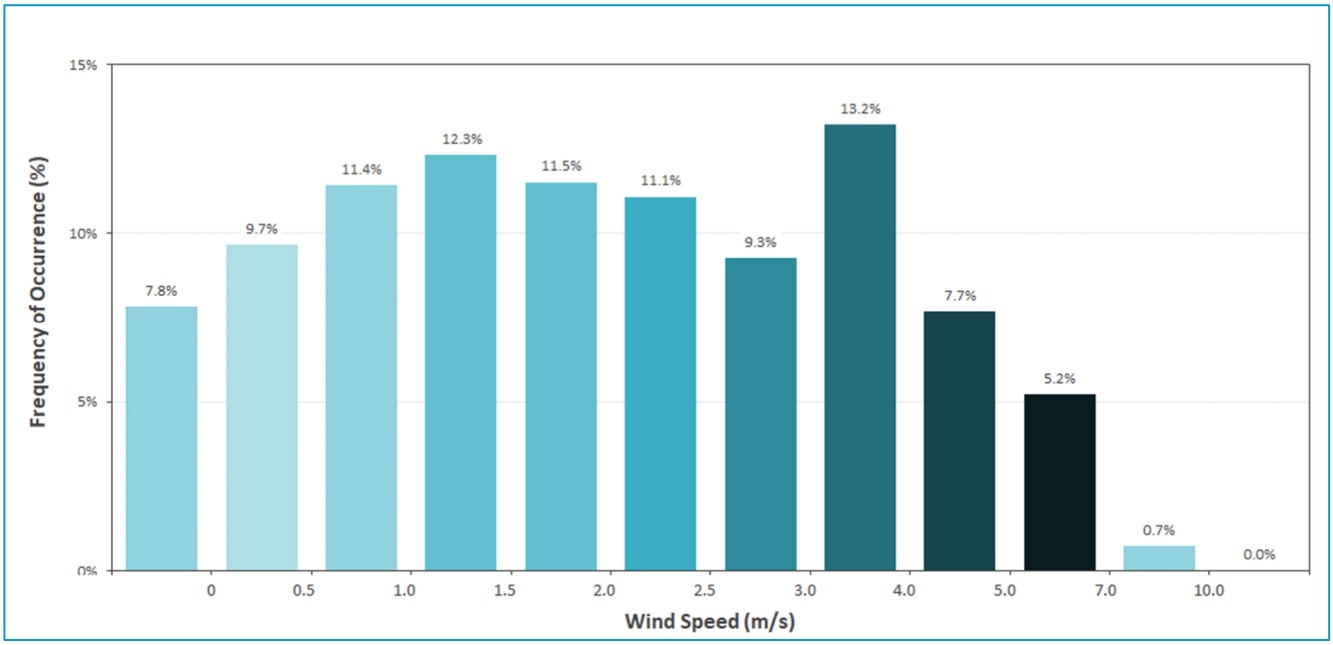


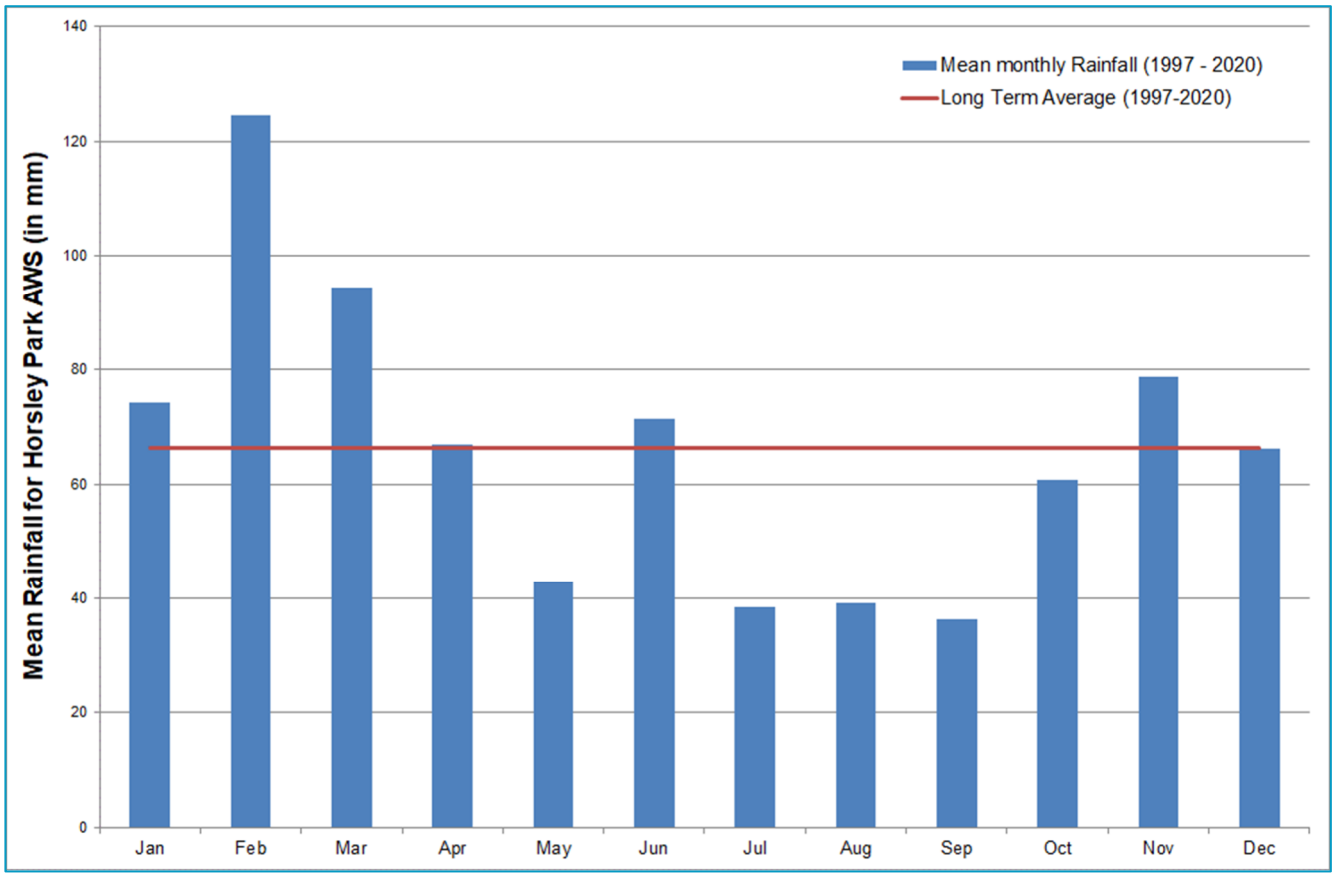
Figure A3 Wind Speed Frequency Chart for Horsley Park AWS – 2017-2021



Rainfall

Dry periods (no rainfall) have the greatest potential for fugitive dust emissions during construction. The long-term monthly rainfall averages recorded at Horsley Park AWS rain gauge are shown in **Figure A4**. It is noted that generally rainfall is relatively low in mid-winter to mid spring periods. This rainfall pattern suggests that dust emissions from the construction activities at the Development Site have the greatest potential to impact on receptors for the period of late autumn to early spring.

Figure A4 Long term Mean Rainfall for Horsley Park AWS – 1997 to 2021



APPENDIX B

CONSTRUCTION PHASE RISK ASSESSMENT METHODOLOGY

Step 1 – Screening Based on Separation Distance

As noted in **Section 3.2**, the nearest residential receptors are located approximately 140 m from the southern boundary of the Development Site. The nearest commercial receptors are located approximately 30 m to the south, 100 m to the east and 120 m to the north of the Development Site boundary.

The IAQM screening criteria for further assessment is the presence of a sensitive receptor within:

- 350 m of the boundary of the site; or
- 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s).

As residential receptors are located approximately 140 m of the boundary of the site further assessment is required.

Step 2a – Assessment of Scale and Nature of the Works

Step 2a of the assessment provides "dust emissions magnitudes" for each of four dust generating activities; demolition, earthworks, construction, and track-out (the movement of site material onto public roads by vehicles). The magnitudes are: *Large*; *Medium*; or *Small*, with suggested definitions for each category. The definitions given in the IAQM guidance for earthworks, construction activities and track-out, which are most relevant to this Development, are as follows:

Demolition *(Any activity involved with the removal of an existing structure [or structures]. This may also be referred to as de-construction, specifically when a building is to be removed a small part at a time)*:

- ***Large***: Total building volume >50,000 m^3, potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities >20 m above ground level;
- ***Medium***: Total building volume 20,000 m^3 – 50,000 m^3, potentially dusty construction material, demolition activities 10-20 m above ground level; and
- ***Small***: Total building volume <20,000 m^3, construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <10m above ground, demolition during wetter months.

Earthworks *(Covers the processes of soil-stripping, ground-levelling, excavation and landscaping)*:

- ***Large***: Total site area greater than 10,000 m^2, potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), more than 10 heavy earth moving vehicles active at any one time, formation of bunds greater than 8 m in height, total material moved more than 100,000 t.
- ***Medium***: Total site area 2,500 m^2 to 10,000 m^2, moderately dusty soil type (e.g. silt), 5 to 10 heavy earth moving vehicles active at any one time, formation of bunds 4 m to 8 m in height, total material moved 20,000 t to 100,000 t.

- ***Small***: Total site area less than 2,500 m^2, soil type with large grain size (e.g. sand), less than five heavy earth moving vehicles active at any one time, formation of bunds less than 4 m in height, total material moved less than 20,000 t, earthworks during wetter months.

Construction *(Any activity involved with the provision of a new structure (or structures), its modification or refurbishment. A structure will include a residential dwelling, office building, retail outlet, road, etc)*:

- ***Large***: Total building volume greater than 100,000 m^3, piling, on site concrete batching; sandblasting.
- ***Medium***: Total building volume 25,000 m^3 to 100,000 m^3, potentially dusty construction material (e.g. concrete), piling, on site concrete batching.
- ***Small***: Total building volume less than 25,000 m^3, construction material with low potential for dust release (e.g. metal cladding or timber).

Track-out *(The transport of dust and dirt from the construction / demolition site onto the public road network, where it may be deposited and then re-suspended by vehicles using the network)*:

- ***Large***: More than 50 heavy vehicle movements per day, surface materials with a high potential for dust generation, greater than 100 m of unpaved road length.
- ***Medium***: Between 10 and 50 heavy vehicle movements per day, surface materials with a moderate potential for dust generation, between 50 m and 100 m of unpaved road length.
- ***Small***: Less than 10 heavy vehicle movements per day, surface materials with a low potential for dust generation, less than 50 m of unpaved road length.

Note: No significant demolition activities are proposed as part of the works.

In order to provide a conservative assessment of potential impacts, it has been assumed that if at least one of the parameters specified in the 'large' definition is satisfied, the works are classified as large, and so on.

Based on the above, dust emission magnitudes have been categorised as presented in **Table B1**.

Table B1 Categorisation of Dust Emission Magnitude

Activity	Dust Emission Magnitude	Basis
Earthworks	Large	**IAQM Definition:** Total site area greater than 10,000 m^2, potentially dusty soil type (eg clay, which will be prone to suspension when dry due to small particle size), more than 10 heavy earth moving vehicles active at any one time, formation of bunds greater than 8 m in height, total material moved more than 100,000 t. **Relevance to this Project:** *An estimated 52.2 ha (522,000 m^2) site area is expected to undergo bulk earthworks.*
Construction	Medium	**IAQM Definition:** Total building volume 25,000 m^3 to 100,000 m^3, potentially dusty construction material (eg concrete), piling, on site concrete batching. **Relevance to this Project:** *A warehouse and distribution building is proposed to be constructed on Lot 10 covering an area of 45,225 m^2 including 3,006 m^2 of office space.*
Trackout	Large	**IAQM Definition:** More than 50 heavy vehicle movements per day, surface materials with a high potential for dust generation, greater than 100 m of unpaved road length. **Relevance to this Project:** *It is estimated that approximately 60 heavy vehicles movements per day will occur during the peak construction period.*

Step 2b – Risk Assessment

Assessment of the Sensitivity of the Area

Step 2b of the assessment process requires the sensitivity of the area to be defined. The sensitivity of the area takes into account:

- The specific sensitivities that identified sensitive receptors have to dust deposition and human health impacts;
- The proximity and number of those receptors;
- In the case of PM_{10}, the local background concentration; and
- Other site-specific factors, such as whether there are natural shelters such as trees to reduce the risk of wind-blown dust.

Individual receptors are classified as having *high*, *medium* or *low* sensitivity to dust deposition and human health impacts (ecological receptors are not addressed using this approach). The IAQM method provides guidance on the sensitivity of different receptor types to dust soiling and health effects as summarised in **Table B2**. It is noted that user expectations of amenity levels (dust soiling) is dependent on existing deposition levels.

Table B2 IAQM Guidance for Categorising Receptor Sensitivity

Value	High Sensitivity Receptor	Medium Sensitivity Receptor	Low Sensitivity Receptor
Dust soiling	Users can reasonably expect a high level of amenity; or The appearance, aesthetics or value of their property would be diminished by soiling, and the people or property would reasonably be expected to be present continuously, or at least regularly for extended periods as part of the normal pattern of use of the land.	Users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or The appearance, aesthetics or value of their property could be diminished by soiling; or The people or property wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land.	The enjoyment of amenity would not reasonably be expected; or Property would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; or There is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land.
	Examples: Dwellings, museums, medium and long term car parks and car showrooms.	*Examples: Parks and places of work.*	*Examples: Playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks and roads.*
Health effects	Locations where the public are exposed over a time period relevant to the air quality objective for PM_{10} (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day).	Locations where the people exposed are workers, and exposure is over a time period relevant to the air quality objective for PM_{10} (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day).	Locations where human exposure is transient.
	Examples: Residential properties, hospitals, schools and residential care homes.	*Examples: Office and shop workers, but will generally not include workers occupationally exposed to PM10.*	*Examples: Public footpaths, playing fields, parks and shopping street.*

According to the IAQM methods, the sensitivity of the identified individual receptors (as described above) is then used to assess the *sensitivity of the area* surrounding the active construction area, taking into account the proximity and number of those receptors, and the local background PM_{10} concentration (in the case of potential health impacts) and other site-specific factors. Additional factors to consider when determining the sensitivity of the area include:

- any history of dust generating activities in the area;
- the likelihood of concurrent dust generating activity on nearby sites;
- any pre-existing screening between the source and the receptors;
- any conclusions drawn from analysing local meteorological data which accurately represent the area and if relevant, the season during which the works will take place;
- any conclusions drawn from local topography;
- the duration of the potential impact (as a receptor may be willing to accept elevated dust levels for a known short duration, or may become more sensitive or less sensitive (acclimatised) over time for long-term impacts); and
- any known specific receptor sensitivities which go beyond the classifications given in the IAQM document.

Based on the criteria listed in **Table B2**, the sensitivity of the identified receptors in this study is concluded to be *high* for health impacts and *high* for dust soiling, as they include residential areas where people may be reasonably expected to be present continuously as part of the normal pattern of land use.

The IAQM guidance for assessing the sensitivity of an area to dust soiling is shown in **Table B3**. The sensitivity of the area should be derived for each of activity relevant to the project (ie construction and earthworks).

Table B3 IAQM Guidance for Categorising the Sensitivity of an Area to Dust Soiling Effects

Receptor Sensitivity	Number of receptors	Distance from the source (m)			
		<20	<50	<100	<350
High	>100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	>1	Medium	Low	Low	Low
Low	>1	Low	Low	Low	Low

Note: Estimate the total number of receptors within the stated distance. Only the *highest level* of area sensitivity from the table needs to be considered. For example, if there are 7 high sensitivity receptors < 20m of the source and 95 high sensitivity receptors between 20 and 50 m, then the total of number of receptors < 50 m is 102. The sensitivity of the area in this case would be high.

A modified version of the IAQM guidance for assessing the *sensitivity of an area* to health impacts is shown in **Table B4**. For high sensitivity receptors, the IAQM methods takes the existing background concentrations of PM_{10} (as an annual average) experienced in the area of interest into account and is based on the air quality objectives for PM_{10} in the UK. As these objectives differ from the ambient air quality criteria adopted for use in this assessment (i.e. an annual average of 19.4 $\mu g/m^3$ for PM_{10}) the IAQM method has been modified slightly.

This approach is consistent with the IAQM guidance, which notes that in using the tables to define the *sensitivity of an area*, professional judgement may be used to determine alternative sensitivity categories, taking into account the following factors:

- any history of dust generating activities in the area;

- the likelihood of concurrent dust generating activity on nearby sites;
- any pre-existing screening between the source and the receptors;
- any conclusions drawn from analysing local meteorological data which accurately represent the area, and if relevant the season during which the works will take place;
- any conclusions drawn from local topography;
- duration of the potential impact; and
- any known specific receptor sensitivities which go beyond the classifications given in this document.

Table B4 IAQM Guidance for Categorising the Sensitivity of an Area to Dust Health Effects

Receptor sensitivity	Annual mean PM_{10} conc.	Number of receptors [a,b]	Distance from the source (m)				
			<20	<50	<100	<200	<350
High	>25 µg/m^3	>100	High	High	High	Medium	Low
		10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
	21-25 µg/m^3	>100	High	High	Medium	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	High	Medium	Low	Low	Low
	17-21 µg/m^3	>100	High	Medium	Low	Low	Low
		10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<17 µg/m^3	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Medium	>25 µg/m^3	>10	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	21-25 µg/m^3	>10	Medium	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	17-21 µg/m^3	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	<17 µg/m^3	>10	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

Notes:

(a) Estimate the total within the stated distance (e.g. the total within 350 m and not the number between 200 and 350 m); noting that only the highest level of area sensitivity from the table needs to be considered.

(b) In the case of high sensitivity receptors with high occupancy (such as schools or hospitals) approximate the number of people likely to be present. In the case of residential dwellings, just include the number of properties.

The nearest sensitive receptor is located within 350 m from the nearest Development Site. Based on the classifications shown in **Table B3** and **Table B4**, the sensitivity of the area to dust soiling and to health effects may both be classified as '*low*'. Additionally, these categorisations have been made taking into account the 5-year mean background PM_{10} concentration of 20.8 µg/m^3 recorded at Prospect AQMS (see **Section 6.2**).

Risk Assessment

The dust emission magnitude from Step 2a and the receptor sensitivity from Step 2b are then used in the matrices shown in **Table B5** (earthworks and construction), **Table B6** (track-out) and **Table B7** (demolition) to determine the risk category with no mitigation applied.

Table B5 Risk Category from Earthworks and Construction Activities

Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

Table B6 Risk Category from Track-out Activities

Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Low Risk	Negligible
Low	Low Risk	Low Risk	Negligible

Table B7 Risk Category from Demolition Activities

Sensitivity of Area	Dust Emission Magnitude		
	Large	Medium	Small
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible

APPENDIX C

AIR QUALITY NOTIFICATION FORM

Construction of Momentum M7	
Air Quality Notification Form ➢ This form to be completed within 24hrs of an exceedance of PM10 dust >50 µg/m^3 (24hr average) on site (CAQMP Sect 5.2.1 Table 4 – 24hr average) ➢ This form to be completed by the Contractor PM, PE or Environmental Representative ➢ Please attach site observation photographs as required	
Contract	
Prepared by (Print Name)	
Position (Project PM, Engineer etc)	
Time/Day/Date of notification	
What were the PM_{10} levels recorded at the start of the shift?	
Was there scope of work specific dust generation observed during the reporting period? (If yes, please provide site specific area)	
Was the measured dust level influenced by dust from external sources? (yes/no/possible)	
Dust generating construction related activities at the time of the notification (1) Provide a brief description of works being undertaken at the time of the dust being observed	
Wind direction and speed relating to the reporting period (show variable wind directions and speed throughout the notification period. Attach wind charts if applicable) (3)	
Were additional dust mitigation resources implemented during the reporting period? (if yes, provide a brief description)	
Sign/Date	
Gazcorp Contract Superintendent to Complete	
Notified ER Time/Day/Date	
Follow up required (yes/no)	
Is this notification issued as a result of an external complaint?	
Sign/Date	

APPENDIX D - CURRICULUM VITAE OF AUTHOR

CURRICULUM VITAE

VARUN MARWAHA

ASSOCIATE

Air Quality, Asia-Pacific

QUALIFICATIONS

BEng	2006	Bachelor of Engineering - Chemical, University of Sydney

EXPERTISE

- Air Quality Dispersion modelling using a variety of software applications
- Meteorological and Ambient air quality monitoring & assessment for legislative compliance
- Australian state and federal regulatory compliance – Air Quality
- Opportunities and constraints reporting
- Detailed knowledge of air quality/meteorological interactions

Varun is an Associate Air Quality Consultant working within the Air Quality team. He has over 10 years of environmental and process engineering experience.

Varun has acquired a broad environmental experience including air quality (including odour) impact assessments, emission inventories (including National Pollutant Inventory), air quality dispersion modelling (including Ausplume, CALPUFF and CAL3QHCR), air quality monitoring (including odour), meteorological monitoring, meteorological modelling (The Air Pollution Model [TAPM] & CALMET), greenhouse gas assessments and overall project management.

Varun has conducted numerous environmental audits and prepared NPI reports for a range of industries including power stations throughout Australia.

Varun is a Certified Air Quality Professional (CAQP) and a Certified Practicing Project Manager (CPPM), and is respected for his contribution to the air quality industry.

PROJECTS

Sentosa Gateway Project, Singapore	The project involved the assessment of air impacts due to road traffic tunnel from Sentosa Island to mainland Singapore. The project proposed to build a tunnel for the outbound traffic from Sentosa with tunnel exits located on Lower Delta Road and Keppel Road. The emissions were quantified and modelled using CAL3QHCR and CALPUFF modelling suites to predict the roadside impacts. The project also included assessment of other sources of pollutants in the region for the cumulative assessment
Sydney Harbour Bridge, Sydney, NSW, Australia	Compliance Monitoring (Lead, PM_{10} and TSP). The project involves repainting the iconic Sydney Harbour Bridge. The process includes stripping the old paint (containing lead), preparation of the surface and repainting. The monitoring was conducted for lead concentration in the air along with the concentration of particulate (PM_{10} and TSP) was required. For lead monitoring, membrane filters were used and for particulate monitoring High Volume air samplers (HVAS) were employed.

Capital Metro Project, Canberra, ACT, Australia (2018-2019)	The project involved preparation of Air Quality Impact Assessment (AQIA) for the proposed ACT Light Rail Stage 1 – Gungahlin to Civic Project, a 12 kilometre light rail service linking the fast- developing area of Gungahlin in the north, to the City. The emissions due to the operation of light rail network were quantified and compared to the existing regional air emissions levels. It was demonstrated that the regional emissions were likely to decrease significantly when compared with the current situation.
Proposed Residential Development, RMS	Road Traffic Impact Assessment. The project involved assessment of roadside impacts on the proposed residential development due to road traffic on a busy motorway. The aim of the project was to determine the maximum impacts and validating against the monitored roadside data. The emissions were quantified and modelled using CAL3QHCR modelling suite to predict the roadside impacts. The project also included assessment of other sources of pollutants in the region for the cumulative assessment. The modelling skills were put to test when integrating predicted results from several modelling suites (CAL3QHCR and CALPUFF)
Proposed Haul Roads (Fortescue Metals Group), WA, Australia	The project involved assessment of two possible options for building haul roads in separate directions. The aim of the project was to determine mine access route from the nearest transport facility. The emissions were quantified and modelled using CALPUFF modelling suite to predict the roadside impacts on the nearest receptors on each haul road route.
Confidential Highway Project, QLD, Australia	Emissions estimation and modelling for an air quality impact assessment for a proposed new highway in Queensland. Work included the estimation of vehicle emissions for the operational phase using the COPERT-Australia emissions modelling software and dispersion modelling of the road and tunnel emissions using CAL3QHCR and CALPUFF dispersion models.
MEMBERSHIPS	Clean Air Society of Australia and New Zealand (CASANZ)
	Member of Engineers Australia (EA)
	Institute of Chemical Engineers (IChemE)
ACCREDITATION	Certified Air Quality Professional (CAQP), CASANZ
	Certified Practicing Project Manager (CPPM), UNE
TRAINING	Advanced CALPUFF Course – Clean Air Society of Australia and New Zealand (CASANZ), 2008
	The Role of Meteorology in Dispersion Modelling – CASANZ, 2011
	Diploma of Project Management – University of New England, 2012

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