

APPENDIX 22

Qualitative Air Quality Review and Sapphire Wind Farm Construction Dust Management Plan

SLR Consulting Australia Pty Ltd



21 March 2011

670.10113 Letter 20110321

Wind Prospect CWP Pty Ltd
PO Box 1708
Newcastle NSW 2300

Attention: Adrian Maddocks

Dear Adrian

Qualitative Air Quality Review

SLR Consulting Pty Ltd (SLR Consulting) has been commissioned by Wind Prospect CWP Pty Ltd to conduct an air quality review of the construction and operation associated with the Sapphire Wind Farm development near Glen Innes in NSW.

The Sapphire Wind Farm development proposal comprises of a wind farm consisting of 159 1.5 MW wind turbines or 125 3.4 MW wind turbines or equivalent spread over 22 different properties. It is expected that the construction and commissioning would occur over a period of approximately eighteen and three months respectively. The proposal includes temporary mobile concrete batching plants, rock crushing facilities, construction facilities including site office, parking and materials storage areas.

The proposed site incorporates 22 landowners and 106 receivers. The closest receiver to a wind turbine construction site and a mobile rock crushing facility is approximately 1.0 km.

Potential dust emissions sources resulting from the proposed development include;

- Clearing of vegetation.
- Open exposed areas.
- Stockpiles.
- Excavation works.
- Mobile concrete batching plants.
- Rock crushing.
- Processing and handling of material.
- Construction activities.
- Transfer points.
- Loading and unloading of material.
- Haulage activities along unsealed roads.

There is potential for the generation of dust during the construction phase, in particular, mobile concrete production and rock crushing. It is understood that there are two potential options for the supply of concrete: one is using suppliers from Glen Innes or Inverell, and the other is using mobile batch plants on-site. Rock crushing for the purpose of producing road base will potentially occur at the same site.

Heggies Pty Ltd was renamed to SLR Consulting Australia Pty Ltd effective 17 December 2010 with no change to ACN/ABN

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Air quality impacts associated with the operation of the proposed mobile concrete plant and rock crushers include the following:

- Particulate emissions associated with the transfer of sand and aggregate to the concrete batch plant hoppers.
- Particulate emissions associated with the unloading of cement to elevated storage silos, via pneumatic transfer.
- Weigh hopper loading.
- Fugitive dust emissions from trucks on the site.
- Particulate emissions associated with the primary and secondary rock crushing.

To provide an estimate of dust emissions from the above activities and based on previous experience on other similar sites, the following assumptions have been made:

- Hours of operation during construction are 7am to 6pm weekdays and 7am or 8am to 1pm on Saturdays.
- A maximum crushing rate of 50 tonnes per hour.
- Maximum concrete production of 310 cubic metres per day. It is understood that the foundations for one turbine per day will be constructed. It is assumed that each foundation is composed of approximately 310 cubic metres of concrete to be poured over an eight hour period (12 mixer truck trips per hour).

To provide an indication of the dust emissions for both a mobile concrete batch plant and rock crushing activities, **Table 1**, describes the total emissions (worst case scenario) anticipated from a concrete/crusher site.

- For concrete plant operations, emission factors have been used as contained in Table 11.12-1 of the US EPA document "AP-42 Compilation of Air Pollutant Emission Factors, Fifth Edition, Chapter 11.12 Concrete Batching".
- For primary and secondary crushing, default emission factors have been used as contained in Table 1 of the *Emission Estimation Technique Manual for Mining, Version 2.3*, (hereafter, "EETMM") (Environment Australia, 2001).

Table 1 Estimated Dust Emissions – Worst Case Scenario

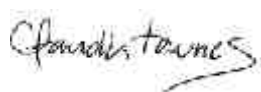
Estimated Dust Emissions							
Activity	Dust Emission Factor	PM₁₀ Emission Factor	Emission Factor Units	Throughput	Daily Hours of operation	Maximum daily dust total (kg)	Maximum daily PM₁₀ total (kg)
Sand Transfer	0.0011	0.00051	Kg/t	24	2	0.026	0.01
Aggregate transfer	0.0035	0.0017	Kg/t	31	2	0.109	0.053
Unloading of cement to elevated storage silos (pneumatic transfer)	0.0005	0.002	Kg/t	30	2	0.02	0.06
Weigh Hopper Loading	0.0026	0.0013	Kg/t	52	2	0.135	0.068
Truck Loading (truck mix)	0.559	0.155	Kg/t	64		35.776	9.92
Wind erosion from sand and aggregate storage bins	0.40	0.200	Kg/ha/hr	0.03	n/a	0.012	0.006
Primary Crusher	0.01	0.004	Kg/t	50	4	0.5	0.2
Secondary Crusher	0.03	0.012	Kg/t	50	4	1.5	0.6
TOTAL						38	11

As shown in **Table 1** the maximum daily dust anticipated during the construction phase is 38 kg while the maximum daily PM₁₀ total is 11 kg. It is noted that this also includes the potential dust generated from the unsealed haul roads. This source is dispersed across the entire road length and can be appropriately managed using a water cart when necessary.

Following our review of the potential dust emission sources resulting from the proposed Sapphire Wind Farm development, SLR Consulting is of the opinion that potential dust emissions can be appropriately managed in accordance with the attached Construction Dust Management Plan (CDMP) titled "670-10113 Dust Management Plan" dated 18 March 2011.

Additionally, SLR estimates that during the operation phase dust emissions will not be an issue given the absence of any activity involving crushing and concrete production, as well as the minimum use of internal tracks (only for routine site visits, maintenance, environmental condition monitoring, etc.).

Yours sincerely



CLAUDIA TOWNES
Project Consultant



global environmental solutions

Sapphire Wind Farm Construction Dust Management Plan

Report Number 670.10113-R1

18 March 2011

Wind Prospect CWP Pty Ltd
PO Box 1708
Newcastle NSW 2300

Version: Revision 0

Sapphire Wind Farm

Construction Dust Management Plan

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670.10113-R1	Revision 0	18 March 2011	Claudia Townes	Jason Watson	Jason Watson
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1 INTRODUCTION

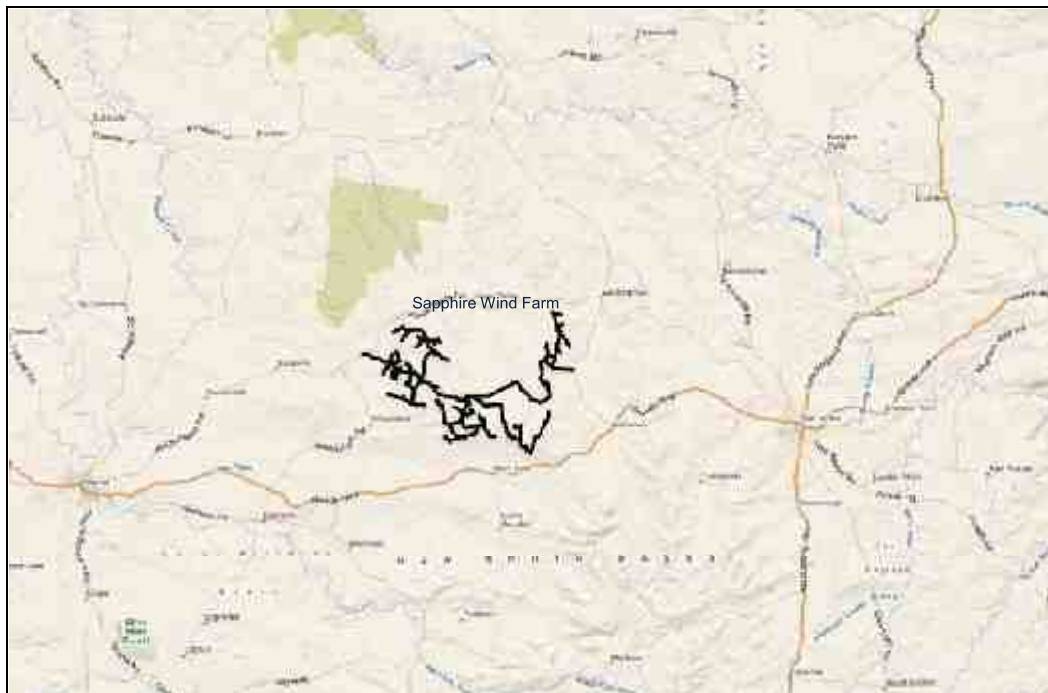
SLR Consulting Pty Ltd (SLR Consulting) has been commissioned by Wind Prospect CWP Pty Ltd to produce a Construction Dust Management Plan (CDMP) for the activities associated with the Sapphire Wind Farm development in NSW.

The Sapphire Wind Farm development proposal comprises of a wind farm consisting of 159 1.5 MW wind turbines or 125 3.4 MW wind turbines or equivalent spread over 22 different properties. It is expected that the construction and commissioning would occur over a period of approximately twenty-one months. The proposal includes temporary mobile concrete batching plants, rock crushing facilities, construction facilities including site office, parking and materials storage areas.

1.1 Site Description

The proposed Sapphire Wind Farm will be located on rural land 28km east of Inverell and 18km west of Glen Innes (**Figure 1**), covering the areas called Kings Plains, Wellingrove and Sapphire.

Figure 1 Location of proposed Sapphire Wind Farm



1.2 Receivers

The proposed site incorporates 106 receiver's properties. Properties surrounding and including the proposed site to the north and northwest are generally located along or accessed from Kings Plains Road. Properties surrounding and including the proposed site to the south and southeast are generally located along or accessed from Gwydir Highway. The sensitive receivers located within 6 km of a proposed wind turbine generator (WTG), are the same for the 159 and 125 turbines plans as indicated in **Figure 2** (159 turbines) and **Figure 3** (125 turbines).

Figure 2 Receivers - 80 m Layout

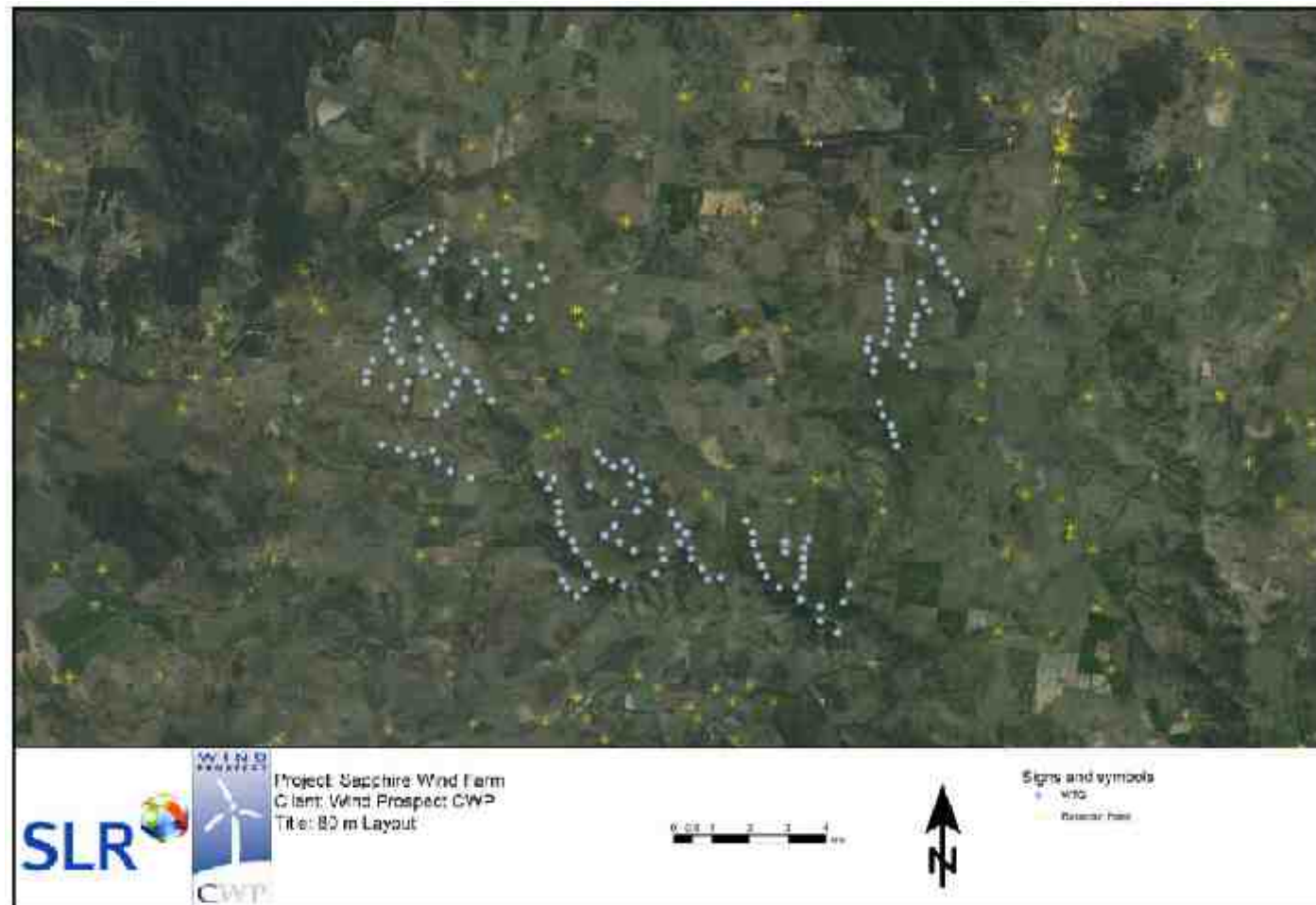


Figure 3 Receivers - 110 m Layout

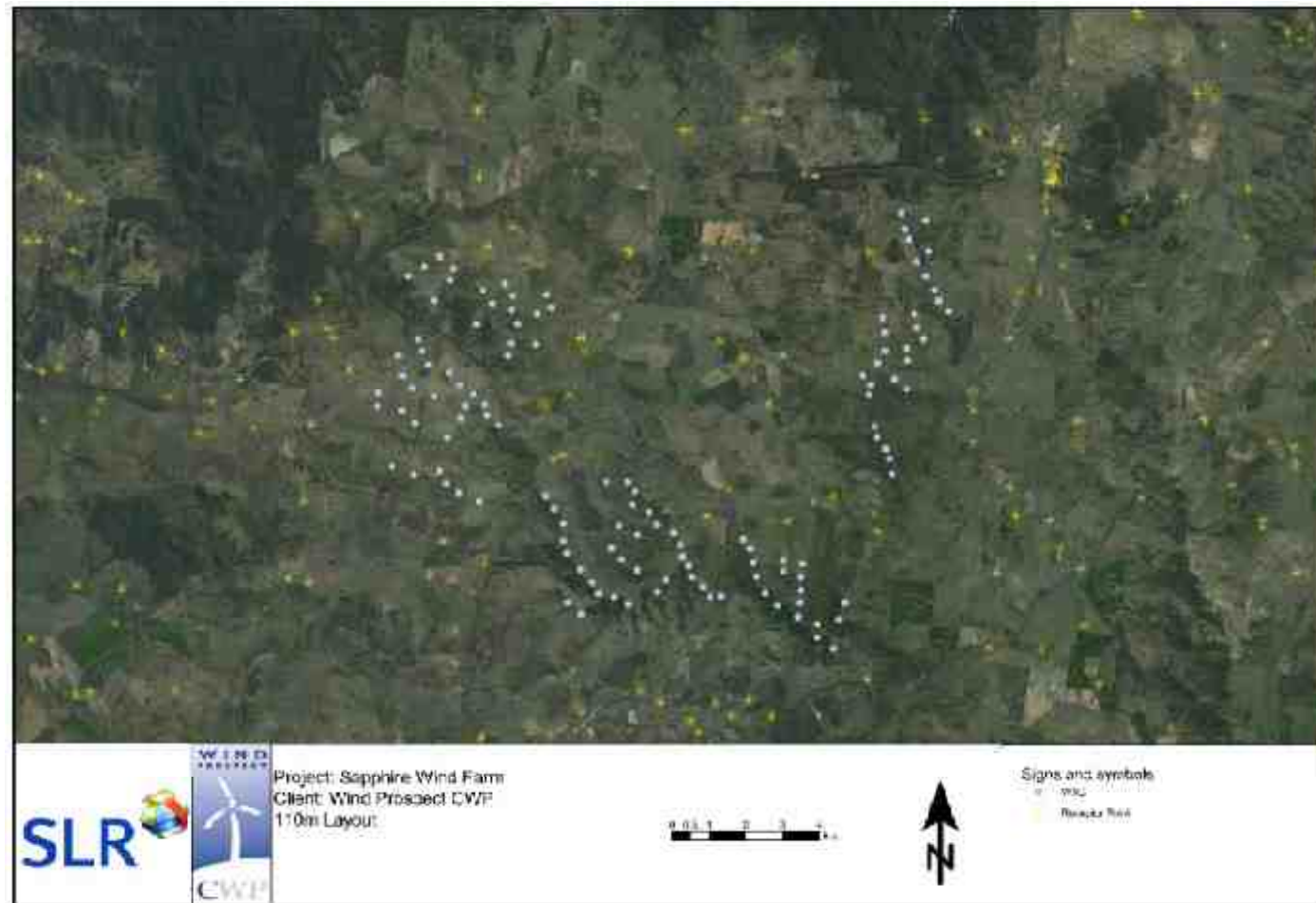


Table 1 lists the receiver locations and their position. Other dwellings located beyond 6 km of a proposed WTG have not been included.

Table 1 Surrounding Receivers

Building Name	East (m)	North (m)	Building Name	East (m)	North (m)	Building Name	East (m)	North (m)
Woodlands	345656	6722033	The Knoll	339309	6714061	Quabadee	360918	6707398
Rock Leigh	339586	6713397	Glenidle	350098	6719960	Osterley	356270	6718169
Royal Oaks	351407	6705486	Kings Plains Castle	351310	6721485	Coorimbla Park	348745	6705191
Woodstock	344734	6710344	Derra Downs	345942	6718360	Yarrawa Park	348459	6705713
Kingshill	347698	6712560	Weean	349716	6718265	Cottages	351195	6721501
Narren Vale	347964	6712709	Bon Vista	350062	6706296	Ashgrove	351628	6705174
Wongajong	337282	6714250	Manaroo	354732	6711418	Swan Peak	341073	6709238
Inverness	349207	6704597	Meadow Vale	352871	6715339	Weean tage	349774	6718156
Mindora	352079	6705927	Cubba	352203	6715808	House #2	355284	6711563
Millie	346894	6720935	Glen Valley	340512	6709341	Waterloo Cottage	361416	6710180
Coleraine	342391	6719183	Strathdarr	348115	6714302	Church	361984	6709599
Bellview	345747	6705021	Pine Grove	353147	6714764	Blumkaitis	361047	6719709
Leeweena	354052	6710888	Kia-Tami	345866	6709763	Tomali Park	341323	6716902
Swamp Oak	338449	6714147	Windemere	348773	6720327	Frasers Creek	341581	6716131
Highlands	344366	6709456	Evergreen	359702	6709490	240 Krystal Blue	341127	6713513
Warrandah	348545	6715514	Fassifern	361141	6710925	Pieta	353603	6705629
Croye	345670	6720193	122	361719	6723352	Glen Idle	352517	6705629
Lochlea	348517	6715896	Wangalee	360204	6721206	Arranmore	361430	6721013
Yarrandoo	347511	6714046	Tarana	360055	6711821	Willow View	361297	6720212
Canjurra	354242	6723623	Hall	361151	6720131	937	361161	6720351
Nolimba	354512	6720316	Fruin Glen	359065	6713012	962	361333	6720544
Ardleigh	353918	6715414	Karoola	359073	6713906	962	361131	6720143
Golden Grove	347645	6705095	Mt Buckley	356193	6706606	Church	361243	6720055
Lochbore	338106	6713277	Greenfield	360645	6718054	Yardwell	362218	6718863
Carinya	346593	6718876	Fairy Meadow	360325	6717140	June	363149	6719066
Tara	343516	6704861	Taurauga	356480	6710616	Blue Grove	361049	6720593
Mubbarra	351847	6711045	Falkland	360082	6715875	DA Approved	359205	6721447
Woodburn	353527	6714064	Waterloo	361396	6709936	Highview	357787	6721754
Spring Creek	341747	6715890	Farley	360869	6717145	Tantangra	353101	6718212
Roseana	339086	6715690	Down Field	356400	6711098	255 Mine	349396	6716500
Kaludabah	352906	6721766	Pitiochry	361874	6713620	256 Mine	348407	6715889
Warrawee	352554	6704583	Springfield	361039	6719272	257 311	339200	6714752
Tralee	342174	6715048	Adavale	359507	6707479	258 Lambert	352980	6706029
Hillview	350617	6705977	Rutherglen	361491	6717821	259 Akoomie	361334	6718673
Argyle	340955	6711465	Maid's Valley	360213	6711026	261 Wirra Willa	340655	6716039
Yarrabin	352461	6711770						

2 OBJECTIVES

The specific objectives of this CDMP are as follows:

- To assist in ensuring that standards of air quality during the construction works comply with all relevant statutory guidelines.
- To minimise the air quality impacts on surrounding sensitive receivers.
- To maintain reasonable levels of amenity for surrounding residences, in terms of nuisance dust impacts.
- To define the roles, responsibilities, and the tasks to be performed, in regard to the control and monitoring of emissions effecting air quality, and
- To assist in responding quickly and effectively to issues and complaints.

3 DESCRIPTION OF CONSTRUCTION ACTIVITIES

The construction and grid connection period is anticipated to be eighteen (18) months and the commissioning phase to be approximately three (3) months.

Construction activities include:

- Earthworks for access roads.
- Construction of access roads.
- Establishment of turbine tower foundations.
- Construction of one or more collector substations.
- Construction of crane hardstands.
- Construction of a switching substation.
- Digging of trenches to accommodate underground power cables.
- Erection of up to 159 wind turbines.
- Six (6) permanent wind monitoring masts and assembly of WTG's.
- Construction of temporary facilities including site office, parking and materials storage areas.
- Construction of mobile concrete batching plant (s) and rock crushing facilities.
- Construction of site operations facilities and services building.
- Production of concrete at an estimated rate of 66 tonnes per day.
- Rock crushing at an estimated rate of 50 tonnes per day.

The equipment required to complete the above tasks will typically include:

- Excavator/grader, bulldozer, dump trucks, roller
- Bucket loader, rock breaker, drill rig, excavator/grader, bulldozer, trucks (dump, flat beds, concrete).
- Excavator, flat bed trucks.
- Cranes, fork lift, and various 4WD and service vehicles.

4 DUST MANAGEMENT AND MITIGATION

4.1 Management

This management plan for Sapphire Wind Farm will address the project requirements outlined in the Referral of *Proposed Action Sapphire Wind Farm Inverell and Glen Innes, NSW* submitted to the Department of Sustainability, Environment, Water, Population and Communities for approval on 21st February, 2011. The recommendations and mitigation measures contained in this plan shall be implemented during each construction phase.

The generation of dust is of concern during construction. The following procedures and requirements will be followed during the life of the project to minimise the dust generated:

- Watering of roads and sealing of roads where possible.
- Trucks entering and leaving the site will be well maintained in accordance with the manufacturers' specification to comply with all relevant regulations. Fines may be imposed on vehicles which do not comply with smoke emission standards. Truck movement should be controlled on-site and restricted to designated roadways. Truck wheel washes or other dust removal procedures will be installed to minimise transport of dust offsite.
- Wind breaks composed of earth banks and other screens to protect areas by reducing capacity of the wind to raise dust.
- If necessary suspending construction activities during periods of high winds and covering/watering/revegetating of stockpiles and exposed areas.

The following are basic procedures which will be adopted on-site to control dust and other emissions from construction operations and on-site equipment. The aim of these procedures is to minimise off-site dust nuisance and air quality impacts.

- Activities carried out on-site will be such as to ensure that all equipment used and all facilities erected are designed and operated to control the emission of smoke, dust, fume and other objectionable matter into the atmosphere.
- Precautions to be taken include spraying of earthworks, roads and other surfaces as necessary with water or other suitable liquids, providing dust suppression equipment to any on-site materials batching plant, sealing of temporary haul roads and the modification of operations during high or unfavourable wind conditions.
- Working areas and access roads will be stabilised as soon as practicable to prevent or minimise windblown dust.
- All disturbed areas will be stabilised as soon as practicable to prevent or minimise windblown dust.
- All unsealed trafficable areas be kept sufficiently damp during working hours to minimise windblown or traffic generated dust emissions. Continued use of water on dirt roads helps the formation of a crust so that dust is not as easily generated.
- Water sprays, sprinklers and water carts may be employed if needed to adequately dampen stockpiles, work areas and exposed soils to prevent the emissions of dust from the site. Water carts and other equipment will be available to enable watering at least at an hourly rate of 2 litres per square metre.
- Stockpiles and handling areas will be maintained in a condition which minimises windblown or traffic generated dust. Areas that may be inaccessible by water carts will be kept in a condition which minimises windblown or traffic generated dust using other means.

- All equipment for dust control will be kept in good operating condition. The equipment will be operable at all times with the exception of shutdowns required for maintenance. Construction equipment will be properly maintained to ensure exhaust emissions comply with the Protection of Environmental Operations (POEO) Act.
- If visible smoke can be seen from any equipment (while working on a construction site) for longer than 10 seconds duration, the equipment will be taken out of service and adequately repaired or tuned so that smoke is no longer visible for periods longer than 10 seconds.
- Cleared vegetation, demolition materials and other combustible waste material will not be burnt on-site.
- Silt will be removed from behind filter fences and other erosion control structures on a regular basis, so that collected silt does not become a source of dust.
- No dust, soil or mud shall be deposited from any vehicle on public roads. Where wheel washing facilities are provided on construction works area, all drivers of construction vehicles shall utilise the wheel wash prior to leaving the works area and entering public roads.
- Any dust soil or mud deposited on public roads by sub contractors construction activities and vehicle movements shall be removed immediately and disposed of appropriately
- Hire agreements will contain provisions to stand down equipment which has excessively smoky exhaust.

4.2 Dust Mitigation

The Department of Environment and Climate Change and Water (DECCW) has reviewed the environmental hazards associated with construction sites and prepared a general document containing safeguards to protect the environment during such activities. Many of these safeguards relate to controlling water pollution and run-off; however these procedures frequently help in control of air pollution. The recommendations by the DECCW are those which will, in general, need to be implemented at the various sites of construction and include:

- Watering of roads and sealing of roads where possible.
- Wind breaks composed of earth banks and other screens to protect areas by reducing capacity of the wind to raise dust.
- Trucks entering and leaving the site should be well maintained in accordance with the manufacturer's specification to comply with all relevant regulations. All trucks entering and leaving the construction site should have their loads covered. Fines may be imposed (by the DECCW) on vehicles which do not comply with smoke emission standards. Truck movement should be controlled on-site and restricted to designated roadways. Truck wheel washes or other dust removal procedures should be installed to minimise transport of dust offsite onto public roads.
- If necessary amending of construction during periods of high wind.
- Covering/watering/revegetating of stockpiles and exposed areas.

The following headings outline specific controls and approaches to minimise impacts from wind erosion, spoil stockpiles and vehicle emissions.

4.2.1 Wind Erosion

- Watering of exposed surfaces/application of a crusting agent will be carried out during dry weather, if necessary.
- When winds reach (or exceed) a velocity of 2.5 metres per second, the frequency of water shall increase. When winds exceed 10 metres / second for 10 minutes, work will cease.
- Progressive rehabilitation of exposed sites on completion of different work stages to be undertaken where practical.

4.2.2 Spoil Stockpiles

- Minimising of spoil stockpiling on-site.
- Minimising the number of work faces on stockpiles.
- Stockpiles to be temporarily covered (if short term) or sprayed with water/crusting agent (Polo Dust Bind) (long-term) to keep dust to a minimum.
- When conditions are excessively dusty such that the project air quality goals are anticipated to be exceeded, then all dust generating activities shall cease until conditions improve/dust suppression can be adequately carried out.

4.2.3 General

- Sites and surrounding public roads to be cleaned.
- Under no circumstances will any material be burnt on-site.
- Silt and other materials will be removed from around erosion control structures following any significant rain event (>10mm) to ensure deposits do not become a dust source. The Site Manager (SM) shall be responsible for ensuring this task is undertaken.
- Water spraying to be conducted during the loading of trucks, as required.
- Visual monitoring would be undertaken by the SM to assess the impacts of dust generation upon air quality. If the dust generated as a result of construction work proves to be a nuisance and cannot be controlled through water spraying, works would be reviewed considering dust monitoring results undertaken in accordance with the criteria noted previously.
- During work on siliceous materials, if visual dust is observed, additional water sprays will be used at the workface to suppress dust. This will include the use of a hand held hoses.

5 AIR QUALITY STANDARDS

5.1 Air Quality

In accordance with DECCW requirements "*Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, 2007*", the following monitoring and reporting program has been devised for construction associated with the Sapphire Wind Farm development site.

5.1.1 Project Air Quality Criteria

The following air quality targets outlined in **Table 2** and **Table 3** have been established for the project:

Table 2 Air quality standards / goals for particulate matter

Pollutant	Standard / Goal	Agency
Particulate matter < 10 µm (PM ₁₀)	50 µg/m ³ (24hr maximum)	NSW DEC, NEPM Criteria
	30 µg/m ³ (annual mean)	NSW DEC long-term reporting goal

Table 3 NSW DECCW Criteria for dust fallout

Pollutant	Averaging periods	Maximum increase in deposited dust level ^{1,2}	Maximum total deposited dust level ^{1,2}
Deposited Dust	Annual	2 g.m ² /mth	4 g/m ² /mth

Note 1: Source: NSW DECCW "Approved Methods & Guidance for the Modelling and Assessment of Air Pollutants in NSW", 2007.

Note 2: Dust is assessed as Insoluble Solids as defined by AS 3580.10.1-1991.

5.1.2 Air Quality Monitoring

Ambient air monitoring shall be undertaken using the methods prescribed by the DECCW document "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, 2007" and summarised in **Table 4**.

Table 4 Monitoring Requirements

Pollutant	Method ¹	Frequency
Particulates (Deposited Matter)	AM-1, AM-19	Continuous

Note 1: NSW DECCW "Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales", 2005.

The following requirements shall be adhered to for the above monitoring procedures:

- Analyses shall be carried out by a laboratory accredited to perform them by an independent body acceptable to the DECCW, such as the National Association of Testing Authorities (NATA).
- The results of any monitoring must be provided as a summary report signed by the person required to provide the report. The report must contain at least the following information:
 - Name and address of reporting organisation or individual.
 - Date of issue of report.
 - The test method used and details of any deviation from the method.
 - Period of monitoring (start and end dates).
 - Location of monitoring points (normal address and Australian map grid reference, height above nominal ground level, and a description of the terrain features).
 - The air pollutants measured, the monitoring instruments used, and the description of the air sampling system.
 - Appropriate long term averages.
 - Any factors that may have affected the monitoring results.
 - The precision of the results.

6 DUST MONITORING

Dust monitoring will be conducted during construction activities at the nearest sensitive receivers surrounding the development.

6.1.1 Dust Deposition Monitoring

Dust Deposition Gauges (DDGs) are to be used to assess deposited matter on a continuous basis for the site. To gain representative data of the immediate air quality environment, it is recommended that up to six (6) gauges are installed adjacent the proposed mobile concrete batching plants and rock crushing facilities nearest the sensitive receivers.

Gauges shall be located following discussion and agreement with adjacent receivers and will be installed following liaison with the proponent. Gauges will be exposed for 30 days (+/- 2 days) and will be analysed for Insoluble Solids, Ash Residue and Combustible Matter.

Equipment and methods will comply with "AS 3580.10.1-1991 *Determination of particulates – Deposited Matter – Gravimetric method*".

Locations shall be determined following consideration of AS 2922-1987 "*Guide for Siting of Sampling Units*".

6.1.2 Continuous PM₁₀ Monitoring

On a monthly basis (over 3 days), during periods of intense dust generating activity, continuous real time monitoring of PM₁₀ concentrations using a TSI DustTrak monitor will be undertaken at the nearest residential receiver (over a 24-hour period). The DustTrak is a portable instrument which is suitable for monitoring on construction sites to assist in the management of dust generating activities and provide real-time information to allow modification of site activities as appropriate. Results will be summarised in the monthly environmental monitoring report.

6.1.3 Supplementary Air Quality Monitoring

Supplementary monitoring will also be carried out in response to complaints or exceedances. Monitoring would assess ambient 24-hour average PM₁₀ concentrations using the TSI DustTrak.

7 DUST REPORTING

All air quality monitoring results as stipulated earlier will be reported within 15 days of collection to the SM so that dust control and operational procedures can be reviewed and modified, if required.

Results of construction monitoring will be reported through monthly Environmental Monitoring Reports. These reports shall cover the preceding month's activities.

This report will be forwarded by the Project Manager, and be made available to representatives of the relevant Authorities and shall include a record of air quality complaints.

Monitoring results and sample locations would be made available to the relevant authorities so that an on-going sampling program is developed to the satisfaction of the regulatory authorities.

8 CONTINGENCY RELATING TO NON-COMPLIANCE AND COMPLAINTS HANDLING

8.1 Non-Compliance and Corrective Action

Where site inspections or monitoring results indicate non-compliance with the relevant monitoring criteria, the proponent will plan and carry out corrective action.

If a non-compliance occurs on multiple occasions the SM will:

- Identify the activities that were occurring at the time of the non-compliance.
- Determine the activities that were most likely contributing to the non-compliance (employing continuous monitoring techniques outlined in earlier).
- Review construction process and environmental controls in place for this activity.
- Implement an agreed alternative to more adequately control dust generation.

The corrective action may involve supplementary monitoring to identify the source of the non-conformance, and/or may involve modification of construction techniques or programme to avoid any recurrence or minimise its adverse effects.

8.2 Community Information and Complaints Handling

In order to effectively manage any requests for information or respond to any public concerns in relation to the proposed construction activities and site operation, it is recommended that the following systems be maintained:

- The Company will supply the DECCW and/or department of Planning with the names and appropriate contact numbers for the site construction manager during the construction period and one other senior staff member.
- An **Environmental Hotline Phone Number** will be put in place to allow contact with the Company in relation to any environmental matter including those concerned with dust issues.
- The Company will use a complaint handling system to monitor environmental dust complaints. All information relating to dust complaints will be kept in a register. The register will include but not be restricted to the following information:
 - Date and Time of complaint
 - Complainant details (i.e. full name and contact details)
 - Nature and source of complaint
 - Action taken
 - Follow-up with complainant

The Company will endeavour to respond to any complaint within one working day of its receipt.

9 CLOSURE

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

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