Mayfield West Recycling Facility

Air Quality Management Plan

Prepared for Benedict Recycling Pty Limited

April 2025

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Benedict Recycling Pty Limited

J14152 RP#2

April 2025

Version	Date	Prepared by	Approved by	Comments
V1.1	8 September 2023	Devroopa Paul	Scott Fishwick	Internal review
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V3	30 April 2025	Zainab Ahmed	Scott Fishwick	Updated to include Modification 3 to the approval

Approved by

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30 April 2025
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1 Introduction

Benedict Recycling Pty Ltd (Benedict) is the operator of the Mayfield West Recycling Facility (MWRF) located at 1A McIntosh Drive, Mayfield West.

Development Consent (SSD 7698) granted on 13 March 2018 permits the operation of the resource recovery facility, with a capacity to accept and process up to 315,000 tonnes per year of general solid waste (non-putrescible). Subsequently, the following modifications have been approved:

- Modification 1: to amend the works boundary and relocate the public hand unloading area – approved 27 October 2021.
- Modification 2: to receive, treat and export up to 30,000 tonnes per annum of actual acid sulfate soils (AASS) and potential acid sulfate soils (PASS) – approved 13 June 2023.
- Modification 3: to relocate the approved actual and potential acid sulfate soils receival and processing from the main processing building to an existing vacant building (Mag Shed) on the site – approved 18 February 2025.

The 'Development Consent (as modified)' is the consent as modified by Modification 1, 2 and 3.

The facility operates under an Environment Protection Licence (EPL) (number 20771), issued by the NSW Environment Protection Authority (NSW EPA).

Condition B57 of the Development Consent (as modified) requires that an Air Quality Management Plan (AQMP) is prepared for the facility describing the methods used to minimise dust emissions:

> Prior to the commencement of operations, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The AQMP must:
>
> a) be prepared by a suitably qualified and experienced person(s);
>
> b) be prepared in consultation with the EPA;
>
> c) detail and rank all emissions from all sources of the Development, including particulate emissions and odour;
>
> d) describe the measures that will be implemented to minimise the potential risks to adverse air quality in the area including:
>
> i) the management and mitigation measures to be employed at the site;
>
> ii) plant and equipment being maintained to ensure that it is in good order;
>
> iii) how the air quality impacts of the development will be minimised during adverse meteorological conditions or extraordinary events;
>
> iv) identification of high emission generating operational activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities;
>
> v) compliance with the relevant conditions of this consent;

e) identify the control measures that will be implemented for each emission source; and

f) define what constitutes an air quality incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents.

Condition B58 of the Development Consent (as modified) requires that the most recent version of the AQMP approved by the Secretary be implemented for the duration of the development.

In 2018, Ramboll Australia Pty Ltd (Ramboll) prepared the AQMP on behalf of Benedict Recycling.

This revised AQMP has been prepared by Scott Fishwick, EMM Consulting Pty Ltd (EMM) on behalf of Benedict Recycling. Table 1.1 provides a summary of where the consent conditions relevant to air quality are addressed in the AQMP. Scott has over 19 years' experience as an air quality consultant, specialising in atmospheric dispersion modelling, air quality impact assessments, meteorological processes and air quality management plans.

Table 1.1 Air quality approval conditions

Condition	Relevant section of AQMP
B6C. The receival bays containing Actual or Potential Acid Sulfate Soils must be equipped with fixed misting sprays, a mobile water cart and movable water cannons to keep the material damp at all times.	Section 2.3
B32B. The hand unloading shed shown on the Development Layout Plan in Appendix A must be fitted with an internal dust suppression system.	Section 2.3
B53 The Applicant must maintain the meteorological station to the satisfaction of the EPA for the life of the development.	Section 3.3
B54 All reasonable steps must be taken to minimise dust generated during all works authorised by this consent.	Section 2.3
B54 A. During the operation of the development, the Applicant must ensure that: (a) dust-prone areas and operations are regularly and lightly watered to suppress dust (note: excess watering must be avoided to prevent damage and erosion); and (b) operations are altered or ceased during periods of high wind to prevent dust generation.	Section 2.3 and Section 2.4
B55 The Applicant must ensure that: a) all on-site roads and car parking areas are sealed with concrete or asphalt b) all operating, storage, unloading and loading areas must be sealed with concrete, asphalt or other impervious barrier(s) of the same or greater quality c) water sprinklers at the crushing and screening plant must be utilised at all time when the plant is operational d) dust suppressants must be used to prevent particulate emissions from stockpiles and other dust generating sources e) trucks and vehicles entering and leaving the Development that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading f) crushing occurs for no more than 46 days per year in total g) crushing does not occur during adverse meteorological conditions h) all operations and activities occurring at the Development must be carried out in a manner that minimises the emissions of air pollutants from the Development i) trucks associated with the Development do not track dirt onto the public road network j) public roads used by these trucks are kept clean k) any works are carried out progressively on site to minimise exposed surfaces.	Section 2.3

Table 1.1 Air quality approval conditions

Condition	Relevant section of AQMP
B56 Equipment must be installed and operated in accordance with best practice to ensure that the development complies with all load limits, air quality criteria, air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	Section 2.5
B57 Prior to the commencement of operations, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the secretary. The AQMP must form part of the OEMP required by Condition C4 and be a) be prepared by a suitably qualified and experienced person b) be prepared in consultation with the EPA c) Detail and rank all emissions from all sources of the Development, including particulate emissions and odour d) Describe the measures that will be implemented to minimise the potential risks to adverse air quality in the area including: i) the management and mitigation measures to be employed on site ii) plant and equipment being maintained to ensure that it is in good order iii) how the air quality impacts of the development will be minimised during adverse meteorological conditions or extraordinary events iv) identification of high emission generating operational activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities v) compliance with the relevant conditions of this consent e) identify the control measures that will be implemented for each emission source f) define what constitutes an air quality incident and includes a protocol for identifying and notifying the Department and relevant stakeholders of any relevant air quality incidents.	Chapter 1 Section 2.2 and 2.6 Section 2.3 Section 2.5 Section 2.4 Section 2.2 Chapter 2 Section 2.3 Section 3.5
B58 (b) The Applicant must implement the most recent version of the AQMP approved by the Secretary for the duration of the development.	Chapter 1
B59 The Applicant must carry out Air Quality Monitoring and Reporting of the Development for the first three crushing events following the commencement of the operations to the satisfaction of the Secretary. The monitoring and reporting must: (a) be carried out by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; (b) monitor the dust emissions whilst the Development is in operation and crushing (as described section 3.5 of the RTS) is occurring; (c) include a summary of air emission related complaints and any actions that were carried out to address the complaints; (d) validate the Development against air quality predictions in the RTS; (e) review design and management practices of the Development against industry best practice for dust emissions; and (f) include an action plan that identifies and prioritises additional dust mitigation measures that may be necessary to reduce emissions.	Section 3.3.1
B60 Within three months of each monitoring event, the Applicant must submit a copy of the Air Quality Monitoring Report (Condition B59) to the Secretary, together with its response to any recommendations.	Section 3.3.1
B61 The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Section 2.6, Section 2.7
B61A During operations the Applicant must implement the mitigation measures outlined in the Odour advice prepared by EMM Consulting and dated 30 September 2022.	Section 2.7

Table 1.1 Air quality approval conditions

Condition	Relevant section of AQMP
B61B. During operations the Applicant must implement the mitigation measures outlined in the Odour Assessment prepared by EMM Consulting and dated 22 July 2024.	Section 2.3
B61C. Prior to the commencement of operations, the Applicant must prepare an Odour Response Plan (ORP) to the Satisfaction of the Planning Secretary. The ORP must include a detailed odour response procedure to effectively manage any potential odours from Actual or Potential Acid Sulfate Soils material. The ORP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7.	Section 2.3

2 Emission sources and mitigation measures

2.1 Facility operations

The facility features include:

- buildings including site office, ancillary sheds and staff amenities
- covered storage/handling/processing areas
- sealed/hardstand material sorting and storage areas
- weighbridge and gate house
- surface water management system
- dust management systems
- staff and visitor parking.

The facility is approved to accept up to 315,000 tpa of 'Pre-classified general solid waste (non-putrescible)' as defined by EPA (2014). This mainly consists of the following wastes:

- co-mingled and segregated building and demolition waste – soils, bricks, concrete, paper/cardboard, cloth, plastics, rubber, plasterboard, ceramics, glass, metal and wood
- vegetation and uncontaminated soils
- tiles, asphalt, suitable slags and concrete batching waste
- excavated natural materials (ENMs) including virgin natural excavated material (VNEM) such as sand and sandstone which are generated during bulk earthworks and road and infrastructure repair
- rail ballast and spoils
- AASS and PASS material (up to 30,000 tpa).

Waste is transported by waste contractors to the site via the entry gate located at the southern end of the site off McIntosh Drive. Vehicles proceed to a weighbridge/gate house complex where they are weighed. The gate house is be fitted with closed circuit television (CCTV) capability which monitors the front and rear of vehicles and their load characteristics.

The truck registration, weight, type and size of materials are recorded. The incoming material is classified as rubbish, mixed or clean waste. Weighbridge dockets are issued recording material weight and charges.

Entering vehicles then proceed to the either a covered waste sorting area or a hardstand sorting/storage area where an excavator spreads and segregates the material, accompanied by further examinations of material types. The segregated materials are available for reuse/recycling or further processing. The wastes that cannot be reused or recycled by the site are taken to either landfill or other recycling facilities for further processing.

Empty vehicles entering the site to load recovered materials are CCTV monitored; their registration recorded and then proceed for loading. Vehicles exiting the site may pass through a wheel wash to prevent material being tracked off site.

No special, hazardous restricted solid waste is accepted at the site.

The recycled materials produced include soils, mulches, road-base, metals and dry paper/cardboard. These products meet recycled material specifications while recovering a range of materials that may otherwise be disposed to landfill. All of the materials brought onto the site are taken from the site as products or as rejects for disposal at a licensed landfill.

No materials are land-filled or otherwise disposed anywhere within the site. The facility is approved for the following operating hours:

- Waste processing – 6:00 am to 6:00 pm Monday to Friday and 6:00 am to 5:00 pm Saturday.
- Waste receival – 6:00 am to 6:00 pm Monday to Friday, 6:00 am to 5:00 pm Saturday and 7:00 am to 3:00 pm Sunday.
- Waste dispatch – 6:00 am to 6:00 pm Monday to Friday and 6:00 am to 5:00 pm Saturday.

Crushing operations occur for no more than a total of 46 days in a single year. The number of crushing days are logged and reported to the Department of Planning Housing and Infrastructure (DPHI) in the annual report for the facility (Chapter 3).

The facility is also approved to receive waste material on a 24-hour per day basis on limited occasions to facilitate major infrastructure projects, but only for six occasions per year and for no longer than two weeks in duration.

Under MOD 2 of the consent the development now permits the acceptance of potential acid sulfate soils and or acid sulfate soils for the purpose of lime treatment neutralisation. This is limited up to 30,000 tonnes per year and previously a dedicated area inside the main processing shed, at the northern end, was approved. However, under MOD 3 approval the approved potential acid sulfate soils and or acid sulfate soils receival and processing facility moved from the main processing building to an existing vacant building (Mag Shed) on the eastern side of the site.

2.2 Particulate matter emissions sources

Air quality impact assessment (AQIA) reports were completed by Ramboll Environ in 2016 and 2017 for the facility and involved the quantification of dust emissions from onsite operations at a rate of 315,000 tpa. Potential sources of particulate matter emissions were identified as the following:

- vehicle entrainment of particulate matter due to the haulage of material along the sealed roads at the facility
- unloading of material to the raw material storage areas within the main shed and in the external yard
- crushing and screening of larger material in the external yard
- transport of broken materials to the main shed for processing
- crushing and screening plant operations within the main shed
- loading and transfer of crushed material to stockpiles
- loading of product to truck for dispatch
- diesel fuel combustion by on-site plant and equipment

- wind erosion associated with stockpiles and exposed surfaces in the external yard.

In the AQIA reports, particulate matter emissions from these sources were quantified for three size fractions, namely:

- total suspended particulates (TSP)
- particulate matter with an equivalent aerodynamic diameter of 10 micrometres (PM_{10})
- particulate matter with an equivalent aerodynamic diameter of 2.5 micrometres ($PM_{2.5}$).

Individual emissions sources at the facility were grouped into the following primary source categories:

- truck and mobile equipment movements (wheel generated dust on paved roads and diesel combustion)
- external material handling (truck unloading, handling by mobile plant, loading to trucks and diesel fuel combustion)
- external crushing and screening (including diesel fuel combustion)
- material handling inside shed (truck unloading, handling by mobile plant, loading to trucks and diesel fuel combustion)
- material screening inside shed (including diesel fuel combustion)
- wind erosion of stockpiles and exposed surfaces.

The total TSP, PM_{10} and $PM_{2.5}$ emissions from each category are ranked in Table 2.1, while the contribution to annual emissions by particle size fraction is illustrated in Figure 2.2. From the source category ranking, the material handling and processing in the external yard and the movement of trucks and mobile equipment about site are the largest particulate matter emission sources at the facility.

Material handling activities in the external yard, including truck unloading and loading activities and handling of material by mobile plant, possess the highest emission potential of operational emission sources at the facility. As detailed in Section 2.1, routine material receival is only permitted between the hours of 6:00 am to 6:00 pm Monday to Friday, 6:00 am to 5:00 pm Saturday and 7:00 am to 3:00 pm Sunday, while processing and dispatch activities are only permitted to occur between 6:00 am to 6:00 pm Monday to Friday and 6:00 am to 5:00 pm Saturday.

Material crushing operations are also a key emissions source. These activities will occur for no more than a total of 46 days in a single year. The number of crushing days will be logged and reported to the DPHI in the annual report for the facility (Chapter 3).

These periods represent the hours of peak potential emissions from the facility. Mitigation measures for the material handling activities are presented in Table 2.2. Visual monitoring of dust emissions during periods of peak material handling activities will be conducted by the Site Leading Hand/Supervisor (as per Section 3.2). In the event of visual dust emissions leaving site boundary, dust mitigation measures will be focused on the identified dust emissions source(s) or a temporary restriction and/or cessation of the activity will be implemented.

The mitigation measures for each of the primary source categories are presented in Table 2.2.

Table 2.1 Emission source ranking

Emission source category	Rank of emission source by particulate matter size fraction		
	TSP	PM_{10}	$PM_{2.5}$
External crushing and screening	3	2	3
Material handling in external yard	1	1	1
Material handling inside shed	4	4	2
Screening inside shed	6	6	4
Truck movements	2	3	5
Wind erosion	5	5	6

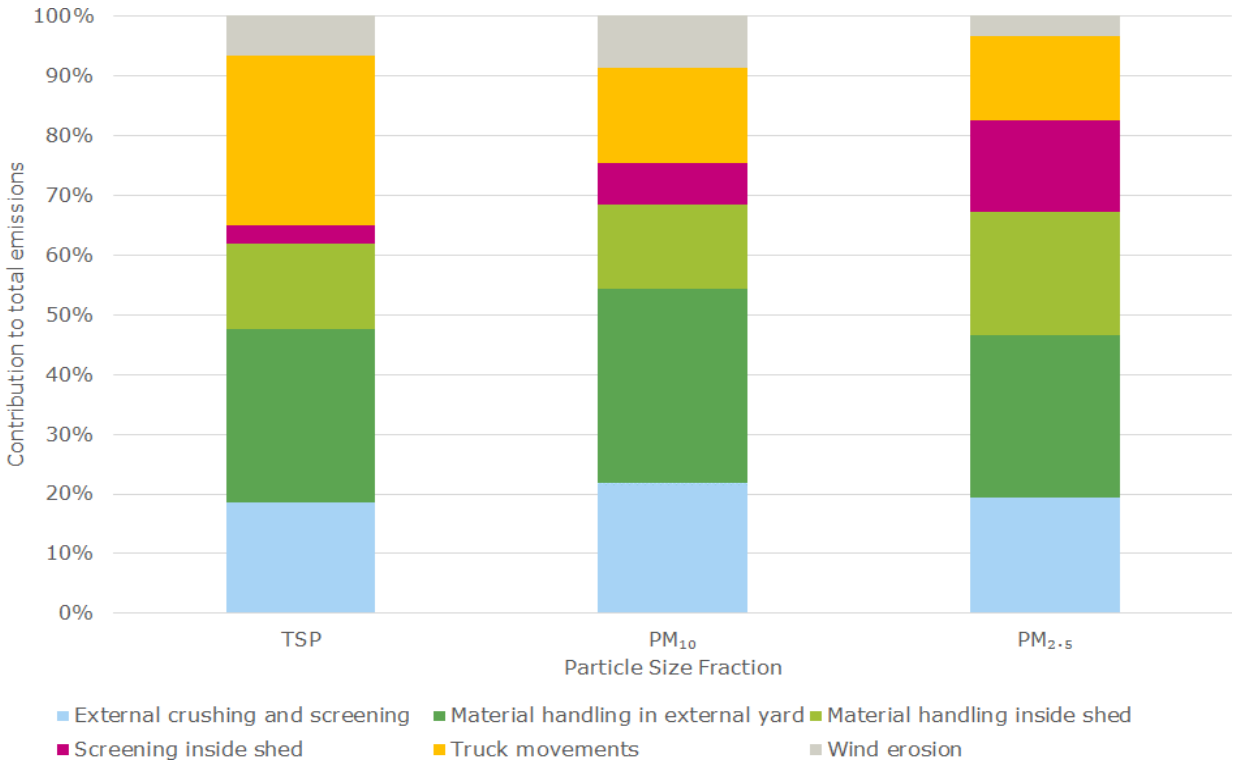

Figure 2.1 Source contribution to annual particulate matter emissions

2.3 Dust mitigation measures

Conditions B6C, B32B, B54 and B55 of the conditions of consent for the project modification relate to dust minimisation.

> B6C. The receival bays containing Actual or Potential Acid Sulfate Soils must be equipped with fixed misting sprays, a mobile water cart and movable water cannons to keep the material damp at all times.

B32B. The hand unloading shed must be fitted with an internal dust suppression system.

B54. All reasonable steps must be taken to minimise dust generated during all works authorised by this consent.

B54A. During the operation of the development, the Applicant must ensure that:

(a) dust-prone areas and operations are regularly and lightly watered to suppress dust (note: excess watering must be avoided to prevent damage and erosion); and

(b) operations are altered or ceased during periods of high wind to prevent dust generation.

B55. The Applicant must ensure that:

a) all on-site roads and car parking areas are sealed with concrete or asphalt

b) all operating, storage, unloading and loading areas must be sealed with concrete, asphalt or other impervious barrier(s) of the same or greater quality

c) water sprinklers at the crushing and screening plant must be utilised at all time when the plant is operational

d) dust suppressants must be used to prevent particulate emissions from stockpiles and other dust generating sources

e) trucks and vehicles entering and leaving the Development that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading

f) crushing occurs for no more than 46 days per year in total

g) crushing does not occur during adverse meteorological conditions

h) all operations and activities occurring at the Development must be carried out in a manner that minimises the emissions of air pollutants from the Development

i) trucks associated with the Development do not track dirt onto the public road network

j) public roads used by these trucks are kept clean and

k) any works are carried out progressively on site to minimise exposed surfaces.

Further, EPL 20771 Condition O3 states:

O3.1 – Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.

O3.2 – Trucks entering and leaving the premises that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading.

In order to meet these requirements, the following management measures are currently in place at the facility and will continue to be implemented to minimise air quality impacts (as per Appendix B of the conditions of consent):

- All existing sealed/hardstand areas will be retained.

- Water sprays will be used over any other bare or unsealed surfaces that have not yet been sealed and have the potential to generate unacceptable amounts of dust.
- All vehicle movements will be restricted to designated routes marked out by appropriate signage and fencing using sealed internal roads.
- Access to unsealed areas will be prevented.
- Restricting stockpile height to 7 m, as per the conditions contained within EPL 20771.
- Water sprays will be used at stockpiles, crushing and screening plants and during material handling as necessary.
- Ceasing or reducing processing operations and the loading/unloading of stockpiles during strong wind conditions.
- Cleaning hardstand/roads by street sweeper.
- A wheel wash in the weighbridge area will be used if required to clean truck tyres to prevent mud or sediment being carried to and deposited on the access road (and public roads).
- Irrigation sprays will only used when the surface of a stockpile is dry and irrigation will be ceased when the surface is wet.
- On-site equipment will be regularly maintained and serviced to maximise fuel efficiency.
- Vehicle kilometres travelled on-site will be minimised.
- A public hand unloading area has been established outside of the northern end of the main processing shed to separate contactor and public tipping for safety reasons. Only light vehicles and trailers are permitted in the public hand unloading area. No heavy vehicles are permitted in this area.
- Currently unsealed areas within the site that are not part of the 'Area to remain unsealed and vegetated' will be progressively sealed with concrete or asphalt.
- Trucks delivering or picking up stored items will access the storage compounds on sealed access roads.
- All light waste (including light waste within co-mingled waste) will be tipped inside the main processing shed.
- The site boundary fences will be inspected daily and any wind-blown light waste within the site will be removed and sent to the main processing shed.
- All parts of the ancillary activities area that are sealed will be regularly swept to prevent the build-up.

Emission source mitigation measures are listed in Table 2.2. The water spray system installed at the facility for the external yard operations is illustrated in Figure 2.2.

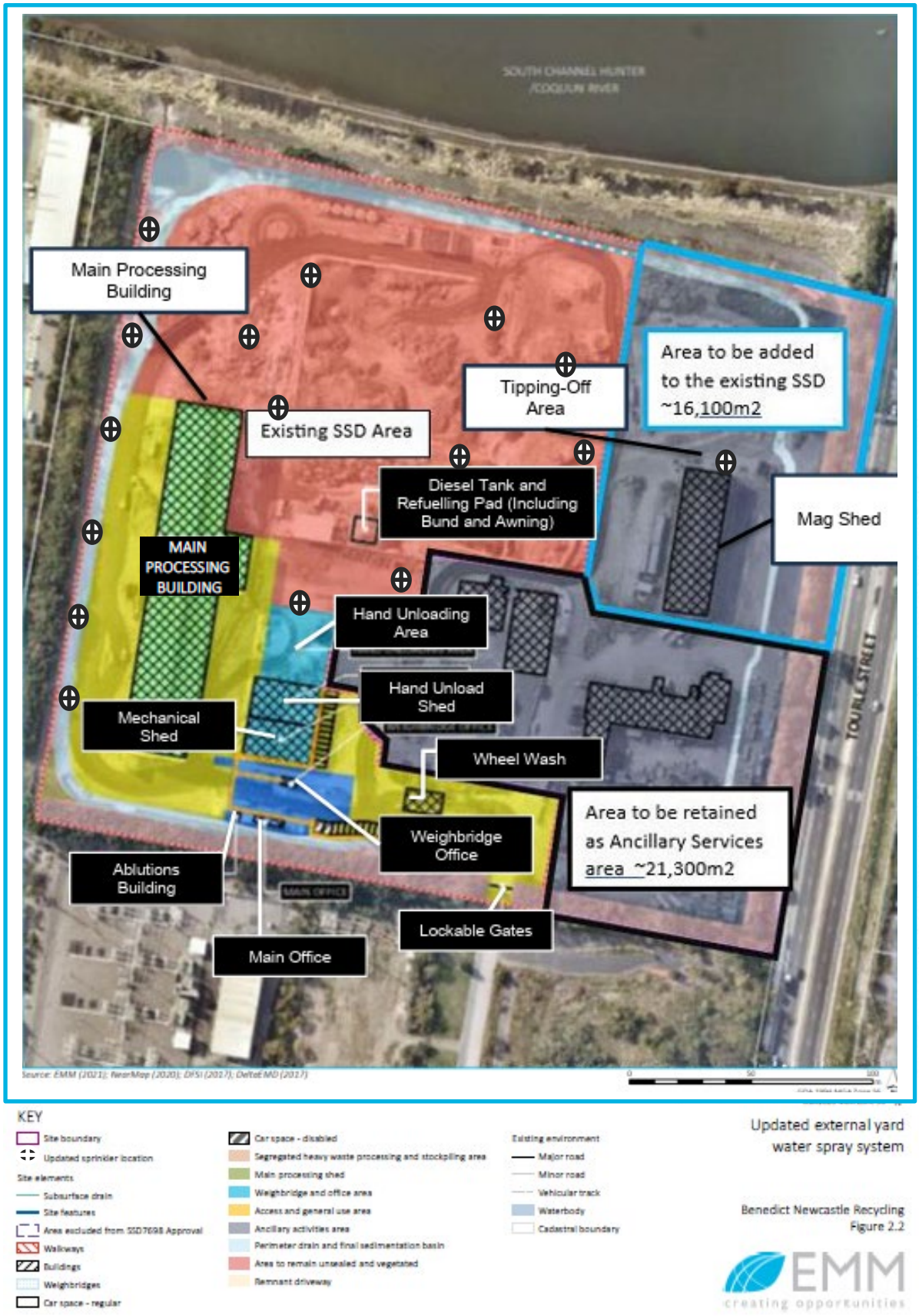

Figure 2.2 External yard water spray system

Table 2.2 Emission source mitigation measures

Emission source category	Mitigation measures in place at the facility
External yard crushing and screening.	Processing plant water sprinkler system to be in operation whenever the crushing and screening plant is operational. The use of water sprays in external yard and at crushing/screening plant increases the moisture content of material being crushed. Crushing and screening activities are reduced or ceased during strong wind conditions.
Material handling in external yard (including truck unloading, material handling and storing by front end loader and excavator, truck loading).	The use of water sprays in external yard increases the moisture content of material being unloaded, transferred and loaded to trucks. Material handling activities are reduced or ceased during strong wind conditions.
Material handling inside shed (including truck unloading, material handling and storing by front end loader and excavator, truck loading).	The use of water sprays increases the moisture content of material being unloaded, transferred and loaded to trucks. Truck unloading within the shed provides wind breaks.
Material processing inside shed.	Shed provides partial enclosure of the material screen. Water misting system to increase material moisture levels through the inside screening process. Conveyor belts and transfer points will be routinely cleaned of overspill.
Truck movements.	Trucks will only move along paved surfaces. Paved surfaces are regularly swept to reduce surface dust loading Travel speeds along all unpaved roads within the facility are limited to 20 km/hr. Reduction in vehicle travel speed minimises dust generation. All loads leaving the site are covered. External customer's loads entering the site are predominantly covered and all customers are encouraged to cover their loads.
Wind erosion of external stockpiles.	Majority of facility area is concreted. Stockpile heights are limited to 7 m in external yard. Water cannon system is used to dampen all external stockpiles areas. Paved surfaces are regularly swept to reduce surface dust loading. All trucks pass through wheel wash on exit of the facility.

2.4 Mitigation during adverse weather conditions

From the perspective of dust emissions from the facility, adverse meteorological conditions are considered to be sustained periods of hot and dry weather and/or high wind speeds. A key environmental management responsibility of facility personnel, led by the facility foreman, is the visual monitoring of dust emissions (Section 3.2 presents air quality emission management responsibilities).

In the event of adverse weather conditions, the facility foreman is required to maintain vigilance for visual dust emissions leaving facility boundary and implement appropriate additional mitigation strategies. Additional mitigation measures will include the targeted use of water sprays at site to the identified dust emissions sources or the temporary restriction and/or cessation of the activity until adverse weather conditions have eased. In accordance with Condition B55(g) crushing is not to occur during adverse weather conditions.

2.5 Plant and equipment emission mitigation measures

All mobile plant and equipment owned and operated by Benedict Recycling at the facility will be routinely serviced to ensure that fuel combustion emissions meet manufacturer emissions specifications on an ongoing basis. At a minimum, all Benedict Recycling mobile plant and equipment will be serviced on an annual basis, with more frequent servicing conducted if required (e.g. occurrence of excessive smoky exhaust). Further, engine idling will be minimised wherever practicable. A register of all servicing to plant and equipment conducted will be established and maintained by Benedict Recycling.

In accordance with Condition B56 of the conditions of consent, equipment will be installed and operated in accordance with best practice to ensure that the development complies with all load limits, air quality criteria, air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.

It is noted that EPL 20771 contains no emission load limits, air quality criteria, air emission limits or air quality monitoring requirements.

2.6 Odour emissions - general

The majority of material received by the facility would be inert building waste and therefore the potential for odour emissions arising is low. The facility is licensed to receive greenwaste material and glass. The facility is not approved to undertake composting on site nor receive putrescible waste.

Storage of potentially odorous material, such as greenwaste, will only occur within the shed and for a limited period of time, reducing the potential for odorous emissions impacting the surrounding area.

Current measures currently implemented at the facility to reduce odour emissions from stockpiled materials include:

- regular monitoring of odour levels in the facility by site personnel
- cleaning of the waste storage/processing areas
- ensuring the removal or residual waste on a timely basis
- use of odour neutralising sprays as required.

2.7 Odour emissions - AASS/PASS material

As stated in Section 1, Benedict received approval to accept and store AASS/PASS material at the facility in June 2023 through SSD 7698 Modification 2. In February 2025, through Modification 3, Benedict received approval to relocate the approved AASS/PASS material receival and processing from the main processing building to an existing vacant building (known as the Mag Shed) on the site.

When disturbed or exposed, AASS/PASS material has the potential to oxidise and form odourous hydrogen sulphide (i.e. rotten egg gas) emissions. To control potential odour emission generation from AASS/PASS material, Benedict implement the following material receival and management procedures:

- Highly reactive PASS material, highly reactive anaerobic soil or mud containing naturally putrescible organic or carbonous material are not to be received by the facility.
- All AASS / PASS material must be subject to an independent and certified waste classification report, as per the NSW EPA Waste Classification Guidelines.
- No more than 500 tonnes of AASS/PASS material may be stored at the facility at any one time.
- All AASS/PASS material must have a pH range of between 4.5 and 5.5.

- All AASS/PASS material handling must occur within the dedicated area of the Mag Shed, within an area that is appropriately bunded.
- Only material that is spadable will be received (i.e. no liquid waste, or material with an exceedingly high moisture content).
- The receival bays containing AASS/PASS material are fitted with misting sprays to keep the material damp at all times.
- Material will be inspected prior to load-out from the site of origin to ensure there are no odour issues at time of loading to trucks for transportation to the facility.
- All received AASS/PASS material at the facility will be treated with lime within 24 hours.
- Any material subsequently and unexpectedly discovered to be odorous after tipping will be immediately quarantined, treated with lime or covered.
- A minimum distance of 20 m from AASS/PASS stockpiles will be maintained by personnel or operators who may occasionally be located within other separate sections of the existing shed building (i.e. other waste tipping areas).
- All excess water from the AASS/PASS shed must be captured in the bunded area and must be removed from the facility for treatment at an appropriately licensed facility, or discharged via an approved trade waste disposal connection.
- Processed AASS/PASS soil material must only be disposed at an appropriately approved facility or reused in a manner that complies with an EPA resource recovery exemption issued pursuant to Clause 93 of the Protection of the Environment (Waste) Regulation 2014.4.
- Prior to the receipt of AASS/PASS material at the recycling facility, Benedict will prepare a specific odour response procedure for the recycling facility.

EMM completed a screening level assessment of the potential odour impact risk from the storage of AASS/PASS material at the recycling facility for both Modification 2 and Modification 3. The odour assessment methodology followed the Level 2 odour assessment approach prescribed by the Environment Protection Authority (EPA) Victoria in the *Guidance for assessing odour*[1] (publication 1883, June 2022, hereafter the VEPA odour guidance. For both Modification 2 and 3, the Level 2 odour assessment returned a low odour risk rating associated with the storage of AASS/PASS material at the recycling facility.

[1] VEPA 2022 - https://www.epa.vic.gov.au/about-epa/publications/1883

3 Monitoring and incident reporting

3.1 EPL operating conditions

Condition O3 of the EPL 20771 for the existing operations at the facility outlines the requirements of dust management, as follows:

> O3.1 Activities must be carried out in a manner that minimises the generation of dust.
>
> O3.2 Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.

3.2 Dust mitigation performance monitoring and responsibilities

Facility personnel are responsible for monitoring the performance of onsite air quality (dust and odour) mitigation measures on a day to day basis. Responsibilities for air quality emission management are as set as follows:

The Site Operator is responsible for:

- managing vehicle speed movements
- restricting operations during periods of strong wind
- utilising spray systems when required for receival, stockpiling and processing activities
- arranging or street sweeping of hardstand/roads when required
- maintain effectiveness of wheel wash by monitoring water levels and the removal of sedimentation when necessary
- arranging for watering of the pavement to reduce dust when appropriate
- regular monitoring of odour levels in the facility
- cleaning of the waste storage/processing areas
- arranging the removal of residual waste
- reducing odours by the use of portable odour neutralising sprays when appropriate.

The site leading hand/supervisor is responsible for:

- regular visual monitoring of the dust levels at the facility
- completion of a complaint form if dust or odour complaint is received
- coordinating with the site manager to ensure the complaint is investigated.

The site manager is responsible for:

- implementing this procedure
- auditing the site on a regular basis to ensure compliance with the OEMP for air and odour emissions
- coordinating investigation of the dust or odour complaints with the site leading hand/supervisor

- documenting the results of the investigation and actions taken
- maintaining the records of the dust and odour complaints
- liaison with the complainant regarding the steps to be taken to minimise further air pollution emissions where appropriate
- ensuring that the nominated officers have been trained in the requirements of this procedure.

3.3 Ambient air quality monitoring

Condition B52 and B53 of the conditions of consent require that Benedict Recycling maintain a suitable meteorological monitoring station that complies with the *NSW EPA Approved Methods for Sampling of Air Pollutants in NSW*. The station must be maintained to the satisfaction of the NSW EPA for the life of the facility operations. A meteorological station was installed at the facility in September 2018.

3.3.1 Air quality monitoring and reporting of the development study (Condition B59)

Condition B59 requires Benedict Recycling to commission an Air Quality Monitoring and Reporting of the Development study for the first three crushing events. The monitoring study is to be conducted by a suitably qualified and experiences person whose appointment is endorsed by the Secretary.

The monitoring and reporting study must:

- monitor the dust emissions whilst the Development is in operation and crushing (as described Section 3.5 of the RTS) is occurring
- include a summary of air emission related complaints and any actions that were carried out to address the complaints
- validate the Development against air quality predictions in the RTS
- review design and management practices of the Development against industry best practice for dust emission
- include an action plan that identifies and prioritises additional dust mitigation measures that may be necessary to reduce emissions.

Each monitoring report must be submitted to the Secretary within three months of each monitoring event.

3.4 Complaints reporting

Any complaint received by Benedict Recycling regarding dust or odour impacts from the facility will be acted on within 24-hours in the following manner:

- Details of the complaint (date, time, specifics, complainants contact details) will be noted.
- Activities occurring during the complaint period to be investigated.
- Log findings of operations during the complaint period in the complaints register. Review relevant management practices as necessary.
- Respond to complainant with findings of the review.

The details of any dust or odour related complaint will be logged, with investigation findings and actions noted. The record of a complaint must be kept for at least 4 years after the complaint was made. The record must be produced to any authorised officer of the EPA who asks to see them

All complaints received will be listed in the EPL Annual Return. A verified complaint would be treated as an air quality incident which would be directly reported to the DPHI.

3.5 Air quality incident definition and response

As stated previously, a verified complaint that is deemed to be the direct result of operational emissions from the facility will be classified as an air quality incident. Within 24-hours of an air quality incident, an initial letter report outlining basic details of the incident will be sent to the DPHI. Within 14 days of an incident, a detailed report will be prepared and submitted to the DPHI documenting incident investigation findings, causes of the incident and additional mitigation measures proposed to prevent a reoccurrence.

A register of verified incidents will be maintained by Benedict Recycling and made available for review on request.

3.6 Review of AQMP

This AQMP will be reviewed and revised as necessary within three months of the following:

- Approval of a modification to site operations.
- Approval of an annual review under Condition C9 of the conditions of consent.
- Submissions of an incident report under Condition C11 of the conditions of consent.
- Completion of an audit under Condition C13 of the conditions of consent.

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