

Management Plan

Air Quality

Risk Statement: High

This document will be reviewed on a one yearly basis, unless a process change occurs earlier than this period. The information in this document relates to management, monitoring and associated reporting required by Development Consent 11_0060 and Mining Leases 1247, 1367 1641 and 1743.

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Revision Summary

First Issue	Issue Date	Implementation Requirements	Approved By
1		Document created	NMT

Version No.	Revision Date	Summary of Revision Details	Approved By
10	Apr 14	Reviewed by A. Youssef – transfer to new CMOC template, document hierarchy added, update of content to reflect current operational status in light of approvals.	NMT
11	Oct 15	Reviewed and updated by E&H Advisor and Supt Env. & Farms.	NMT
12	Feb 16	Reviewed and included new Section 8 by B Ram. With flowcharts for assessing dust data	NMT
13	Mar 16	Reviewed and included comments from DPE. By B Ram Update sections 9.4 and Section 11. Included Appendix 1 for regulatory consultation.	NMT
14	Oct 17	Reviewed by N Jones, only minor changes.	NMT
15	Apr 18	Reviewed by M Thomas, minor changes to section 9.3.4	NMT
16	Oct 18	Reviewed by N Jones, updated to new format, update weekly weather assessment template and minor amendments	CD
17	25 Feb 20	Updated to new DCS. Revision table reduced.	M Row
18	29 Jun 20	Post 2020 Annual Review	C Higgins
19	Jun 21	Annual review	C Higgins

Consultation Required	Hard Copy Locations
<ul style="list-style-type: none"> - Department of Planning, Industry and Environment; - EPA 	Northparkes website

Associated Documents to be Reviewed

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1. OVERVIEW

1.1 Background

CMOC Mining Services Pty Limited (CMOC) is the manager of the Northparkes Joint Venture, an unincorporated joint venture between CMOC Mining Limited (80%); Sumitomo Metal Mining Oceania Pty Ltd (13.3%) and SC Mineral Resources (6.7%). Northparkes is a copper-gold operation in Goonumbla, situated 27 kilometres north-west of the town of Parkes.

Construction of the ore processing plant and associated facilities began in 1993. Open cut mining commenced on the E22 and E27 ore bodies in late 1993. Development of the E26 lift 1 block cave underground mine began in 1994, with full scale production commencing in 1997.

1.2 Mining Context

Operations at Northparkes primarily comprises underground mining from multiple ore sources that feed a processing plant with a capacity of 6½ million tonnes per annum (Mtpa). The underground mine is accessed via a decline ramp from the surface for people and materials with ore transported to the surface via inclined conveyors and a hoisting shaft, with a nominal capacity of 7.2 Mtpa. Northparkes utilises low cost block and sub-level cave mining and exploits industry leading technology, such as semi-autonomous loaders and various cave monitoring systems.

The ore processing operation consists of four stages: crushing, grinding, flotation and thickening / filtering. In addition to producing concentrate, the ore processing team also manages tailings disposal. The concentrator was constructed in two modules. Each module consists of its own grinding circuit with a single flotation circuit, concentrate thickener and filter. After extracting the copper and gold bearing minerals, the tailings are combined in a single tailings thickener before being deposited in the active tailings storage facility.

Northparkes' copper concentrate is transported to a rail siding where it is then transported by rail to Port Kembla, for shipping to overseas customers.

1.3 Air Quality

A detailed Source of environmental dust within the area are limited, and generally subject to specific activities and climatic conditions. Dusty conditions arise in periods of drought, or during specific farming activities such as harvest, sheep work or vehicle transit along unsealed roads. Throughout the remainder of the year, land is generally covered by crops or native grasslands which reduce available dust generating surfaces.

The background air quality levels adopted for the site are listed in Table 1. For each pollutant, the maximum background concentration has been selected for each relevant averaging period.

Table 1: Background air quality levels for particulate matter.

Pollutant	Averaging Period	Assumed Background Ambient Level
Total Suspended Particulate (TSP) Matter	Annual	72µg/m ³
Particulate Matter < 10µm (PM10)	Annual	18µg/m ³
Particulate Matter < 10µm (PM10)	24-hour	Variable
Deposited dust	Annual	2.7g/m ² /month

Northparkes consists of an open cut pit (not currently operational), two underground block cave mines, processing plant and associated waste dumps and tailings dams. Northparkes has been operating since 1994, during this time waste rock dumps of approximately 25m height and tailings impoundments of approximately 24m height have been constructed within the mining lease. Key potential sources of dust on site are open areas, waste dumps, tailings storage facilities (TSF's), unsealed roads and ore transfer.

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Northparkes owns approximately 5,000ha of agricultural land surrounding the mining operations, providing a considerable buffer between operations and our neighbours mitigating potential nuisance impacts of environmental dust on neighbours. However between the site and the nearest residences there is no significant change in topography deemed to influence atmospheric dispersion.

Historical monitoring data indicates that dust generated by mining activities is not extensive and generally falls out within 500m of the source.

2. SCOPE

This document applies to all activities undertaken by Northparkes including mining and exploration activities, processing of copper / gold ore resources, project development, maintenance activities, mine closure, logistics, associated service and support functions, bore fields, farming operations and products.

3. PURPOSE / OBJECTIVES

The objectives of the Air Quality Management Plan (AQMP) are:

- ensure that dust emissions from operations are minimised and appropriately controlled
- ensure that air quality impacts on surrounding residents are minimised
- keep the local community and regulators informed of activities where required and respond quickly and effectively to issues or complaints
- carryout regular monitoring to ensure compliance against air quality criteria
- adequately manage and mitigate potential air quality impacts from the construction and operational activities

4. RESPONSIBILITIES

Specific accountabilities in relation to management of 'air quality' at Northparkes are outlined in Table 2. Personnel carrying out work under this Management Plan must be familiar with and comply with it in full.

General role responsibilities are outlined in the Health, Safety and Environment Responsibilities and Accountabilities Procedure (PRO-0080). Personnel carrying out work under this document must be familiar with and comply with it in full. The following persons have specific responsibility:

Table 2: Responsibilities

Role	Responsibility
Operational	
Superintendent Environment	<ul style="list-style-type: none"> - environmental inductions and training to ensure workforce awareness - restrictions on clearing, topsoil stripping and access to disturbed areas - progressive rehabilitation - implement a program of regular monitoring
Operational Managers	<ul style="list-style-type: none"> - sealing high traffic roads, where possible - control mechanisms on crushing and conveying infrastructure, including complete or partial enclosure dust extraction filters and mist sprays
Manager – Ore Processing	<ul style="list-style-type: none"> - product transportation in sealed containers; - operation of the tailings storage facilities to minimise dust and capped as early as practicable - dust controls on surface - operation of the tailings storage facilities to minimise dust and capped as early as practicable

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Role	Responsibility
Manager – Mining	<ul style="list-style-type: none"> – minimise use of haul trucks (through use of conveyors & planning) – dust controls on surface
Manager – Tech Services	<ul style="list-style-type: none"> – reverse circulation drill rigs
Adverse Weather	
(to be applied in situations where adverse weather conditions are resulting in significant risk of dust generation)	
Manager – Mining	<ul style="list-style-type: none"> – review of the elevation of mining and dumping and, where possible, relocate equipment to lower elevations, until more suitable conditions return
Managing Director	<ul style="list-style-type: none"> – amended working hours – temporary cessation of work within an area
Long Term	
Superintendent Environment	<ul style="list-style-type: none"> – identifying major dust generating activities and implementing appropriate control methods – review monitoring trends to drive improvements and maintain compliance – maintain awareness of current dust control methods and technology
Operational Managers	<ul style="list-style-type: none"> – identifying major dust generating activities and implementing appropriate control methods

5. DEFINITIONS

Table 3: Definitions

Key Word	Definition
TSP	Total Suspended Particulate matter refers to the total of all particles suspended in the air.
PM10	A subset of TSP, and includes all particles smaller than 10µm in diameter
Adverse Weather Conditions	Includes moderate wind speeds prevailing from the west to southwest (blowing in the direction of the closest inhabited residences)

6. KEY ISSUES

6.1 Potential Sources

The potential sources of dust generated by activities include:

- Topsoil stripping;
- Excavation, transportation and placement of materials;
- Wind erosion from disturbed surfaces;
- Exposed dried surfaces of the tailings storage facilities;
- Overland conveying of crushed ore;
- Ore handling at the rill towers and ROM pad;
- Crushing and screening of ore;
- Open cut mining, including drilling and blasting;
- Use of unsealed roads around the mine site;
- Exploration activities; and
- Fuel combustion emissions from onsite vehicles and plant equipment.

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The primary impact of dust generation is likely to be nuisance to surrounding land owners, and the subsequent community impact. Dust generated at the site has not been identified as having contaminant levels that would cause health or environmental impacts. Similarly, to date, there is little evidence to support supposition that environmental dust will have a detrimental impact on flora or fauna in the vicinity of the mine. This does not negate the possibility of future impacts, but literature reviews and monitoring results suggest that the risk is low.

6.2 Air Quality Criteria

6.2.1 Northparkes Development Consent 11_0060

As per Schedule 3, condition 14 of Northparkes Development Consent 11_0060, Northparkes shall ensure that the dust generated by the project the project does not exceed the criteria in Table 4 at any residence on privately-owned land.

Table 4: Long term impact assessment criteria for particulate matter

Pollutant	Averaging period	^a Criterion
Total suspended particulate (TSP) matter	Annual	^a 90 µg/m ³
Particulate matter < 10 µm (PM ₁₀)	Annual	^a 30 µg/m ³

Table 5: Short term impact assessment criterion form particulate matter

Pollutant	Averaging period	^a Criterion
Particulate matter < 10 µm (PM ₁₀)	24 hour	^a 50 µg/m ³

Table 6: Long term impact assessment criteria for deposited dust

Pollutant	Averaging period	Maximum increase ² in deposited dust level	Maximum total ¹ deposited dust level
Deposited dust	Annual	^b 2 g/m ² /month	^a 4 g/m ² /month

Notes to Table 4, Table 5 and Table 6

- a) Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources)
- b) Incremental impact (i.e. incremental increase in concentrations due to the development on its own)
- c) Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method; and
- d) excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Secretary

These limits do not apply if Northparkes have an agreement with the relevant owner/s of the residences or land to generate higher dust levels, and Northparkes has advised the Department of Planning and Environment in writing of the terms of the agreement.

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7. CONTROL MEASURES

Control measures for the management of air quality during construction, operation and decommissioning are essential in minimising air quality impacts.

7.1 Operational

Operational control measures include:

- The property "Avondale" is currently unoccupied and the owners will provide Northparkes notice to update environmental monitoring programs to include the property if this changes
- major works scheduled undergo a risk assessment prior to commencing work
- environmental inductions and training to ensure workforce awareness
- purchase of equipment that meets relevant air emission standards
- maintaining plant and machinery in good working order
- maintaining haul roads in good condition
- regular contact with local residents
- sealing high traffic roads, where possible
- use of water carts on unsealed roads
- scheduling of work with attention paid to adverse weather conditions and modifications made to the work program where necessary
- implementation of best management practice to minimise the construction, operational and road air quality of the operations
- an air quality management system that uses a combination of predictive meteorological forecasting and real-time weather monitoring data to guide the day to day planning of construction and mining operations, and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions and approvals
- a program of regular air quality monitoring of site operations to determine whether the operations are complying with the criteria set out in Northparkes Development Consent 11_0060. This monitoring will be undertaken as real-time dust (continuous) PM10, TSP (6-day cycle) and depositional dust (monthly) monitoring at surrounding receivers over the life of the mine

Adverse Weather

Should adverse weather conditions exist, the following options are available to mitigate offsite, private property impacts:

- review of the elevation of earthworks or mining activities and, where possible, relocate equipment to lower elevations, until more suitable conditions return
- amend working hours where possible
- stop construction works if required for a period of time to reduce any abrupt changes in air quality

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7.2 Risk Assessments

The primary impact of dust generation is likely to be nuisance to surrounding land owners, and the subsequent community impact. Dust generated at the site has not been identified as having contaminant levels that would cause health or environmental impacts. Similarly, to date, there is little evidence to support supposition that environmental dust will have a detrimental impact on flora or fauna in the vicinity of the mine. This does not negate the possibility of future impacts, but literature reviews and monitoring results suggest that the risk is low.

8. MONITORING

An air quality monitoring program is implemented to regularly sample air quality at key locations on and adjacent to the mine site. The program is designed to measure the effectiveness of control measures and ensure compliance with consent and licence conditions, relevant standards and corporate requirements.

The program is comprised of a combination of high-volume air samplers (PM10 and TSP) and depositional dust gauges to monitor performance. All monitoring is undertaken in accordance with the following procedures:

- Environmental Monitoring and Measuring Schedule (REG-0008)
- Depositional Dust Monitoring Work Instruction (WKI- 0180)
- High Volume Air Sampling Monitoring Work Instruction (WKI-0192)

A meteorological monitoring station is maintained to provide real time and periodic meteorological data to assist in the interpretation of results. The environmental dust monitoring program is outlined in Table 7.

Table 7: Environmental Dust Monitoring Requirements

Monitoring Parameter	Monitoring Method	Frequency	Location	Accountable Person
Total Suspended Particulate Matter	Depositional Dust bottles	Monthly	Boundary and offsite monitoring locations outlined in Depositional Dust Monitoring Work Instruction	Environment Advisor
TSP	High Volume Air Sampler	6 days	Milpose Hubberstone Hillview	Environment Advisor
PM10	BAMs – Real time monitors	Continuous	Milpose Hubberstone Hillview	Environment Advisor
Weather -Wind Speed -Wind direction -Rainfall	Meteorological monitoring station	Continuous	Northparkes - Rosedale	Environment Advisor

The Air Quality Monitoring data analysis procedure, found in Depositional Dust Work Instruction will be followed in the event of an exceedance of criteria outlined in Table 1. Any exceedance of the criteria deemed to be attributable to Northparkes, or if the source of the exceedance is unable to be definitively determined will constitute an environmental incident and require reporting through the internal HSE Management system. Any community complaint received in relation to dust will be reported as an environmental incident and investigated accordingly.

Actions required because of an exceedance of the air quality criteria will be determined on a case by case basis, according to determined causal factors.

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8.1 Real Time Dust Monitoring

Northparkes will utilise real-time air quality monitoring with alarm / SMS capabilities at three locations as shown in Figure 1: Northparkes Air Quality Monitoring Location (Real time, TSP's and Depositional Dust). Real time air monitors will:

- monitor and record real time dust
- notify works area supervisors of dust levels encroaching criteria
- run alongside with TSP and depositional dust monitoring to calibrate and validate the real time air quality monitoring results

Any dust that is above the air quality criteria as required by the Development Consent where the source of dust is from the mining activities will be deemed as a dust incident. A detailed investigation will be carried out and mitigation measures will be implemented to reduce the air quality impact. All exceedances and investigations will be reported to the regulators within 7 days of the incident.

8.2 Real Time Meteorological Monitoring

Northparkes operate a meteorological monitoring station, located within area ML 1367. Fifteen minute and 24-hour average wind speed, wind direction, air temperature, relative humidity, solar radiation, and rainfall are being monitored.

These measurements will allow identification of the periods when wind speeds of up to 3m/s at 10m above ground level and temperature inversions of up to 3°C/100m are experienced.

The weather monitoring station Northparkes is sited as required in "Approved Methods for Sampling of Air Pollutants in New South Wales", which complies with AS 2923 – 1987 – Guide for Measurement of Horizontal Wind for Air Quality Applications.

The meteorological station complies with AS 2923 – 1987 on all respects. The 10m tower located on relatively flat terrain and is at least ten times the height of obstructions, and away from those obstructions, as per Section 8.3 of AS 2923 – 1987.

Fifteen minute and 24-hour average wind speed, wind direction, air temperature, relative humidity, solar radiation and rainfall are currently being monitored. These measurements will allow cross reference with dust deposition and High-Volume Air Sampler results to aid in the identification of dust sources should exceedances of the prescribed air quality criteria are observed.

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Figure 1: Northparkes Air Quality Monitoring Location (Real time, TSP's and Depositional Dust)

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9. DATA ANALYSIS

All air quality data will need to be assessed for compliance with licence conditions in Schedule 3, Condition 14 – Air Quality Criteria, of the Northparkes Development Consent No. 11_0600. The process for assessing compliance and a potential incident are highlighted in the following flowcharts.

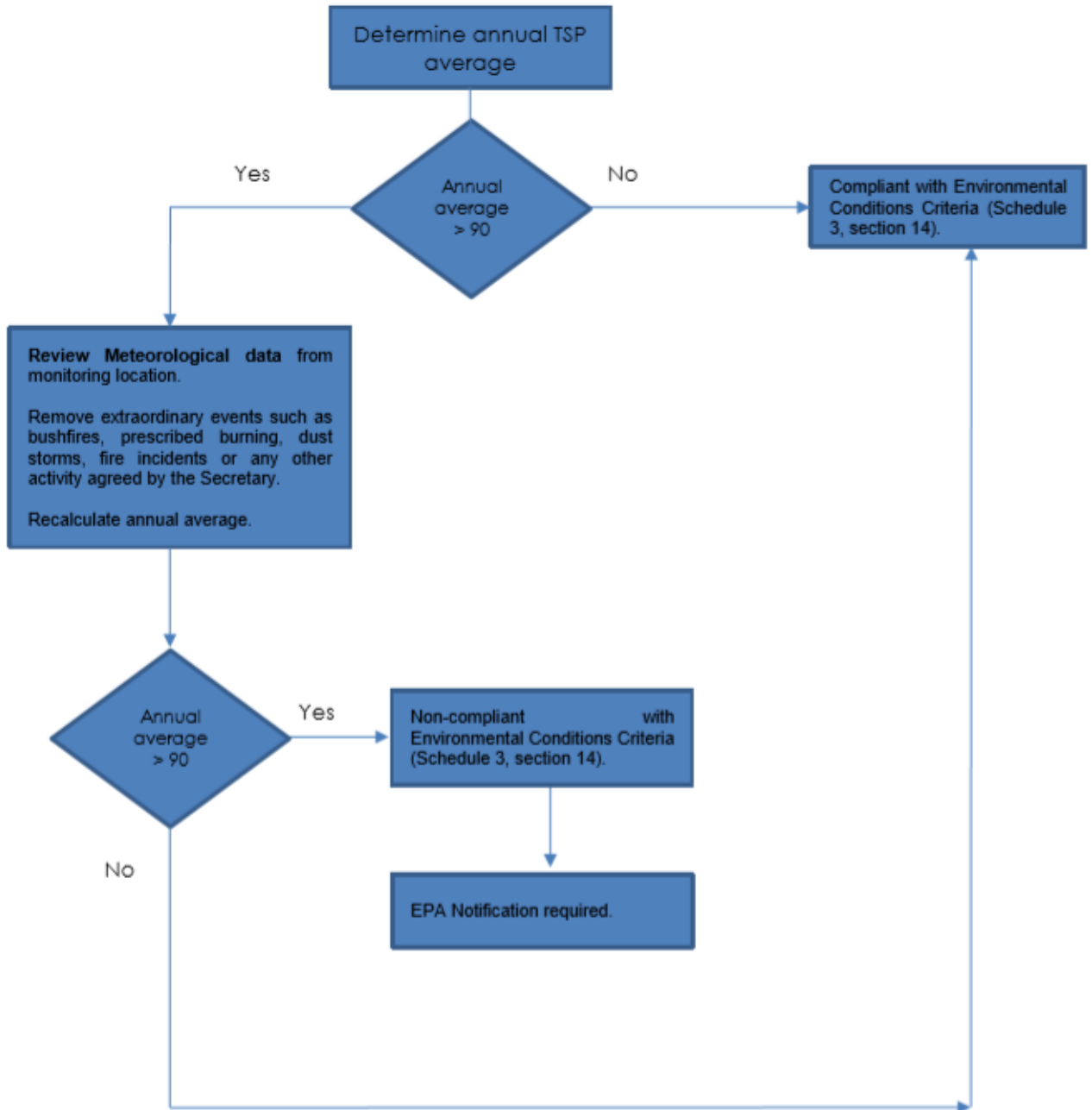


Figure 2: Flowchart for annual TSP monitoring data evaluation.

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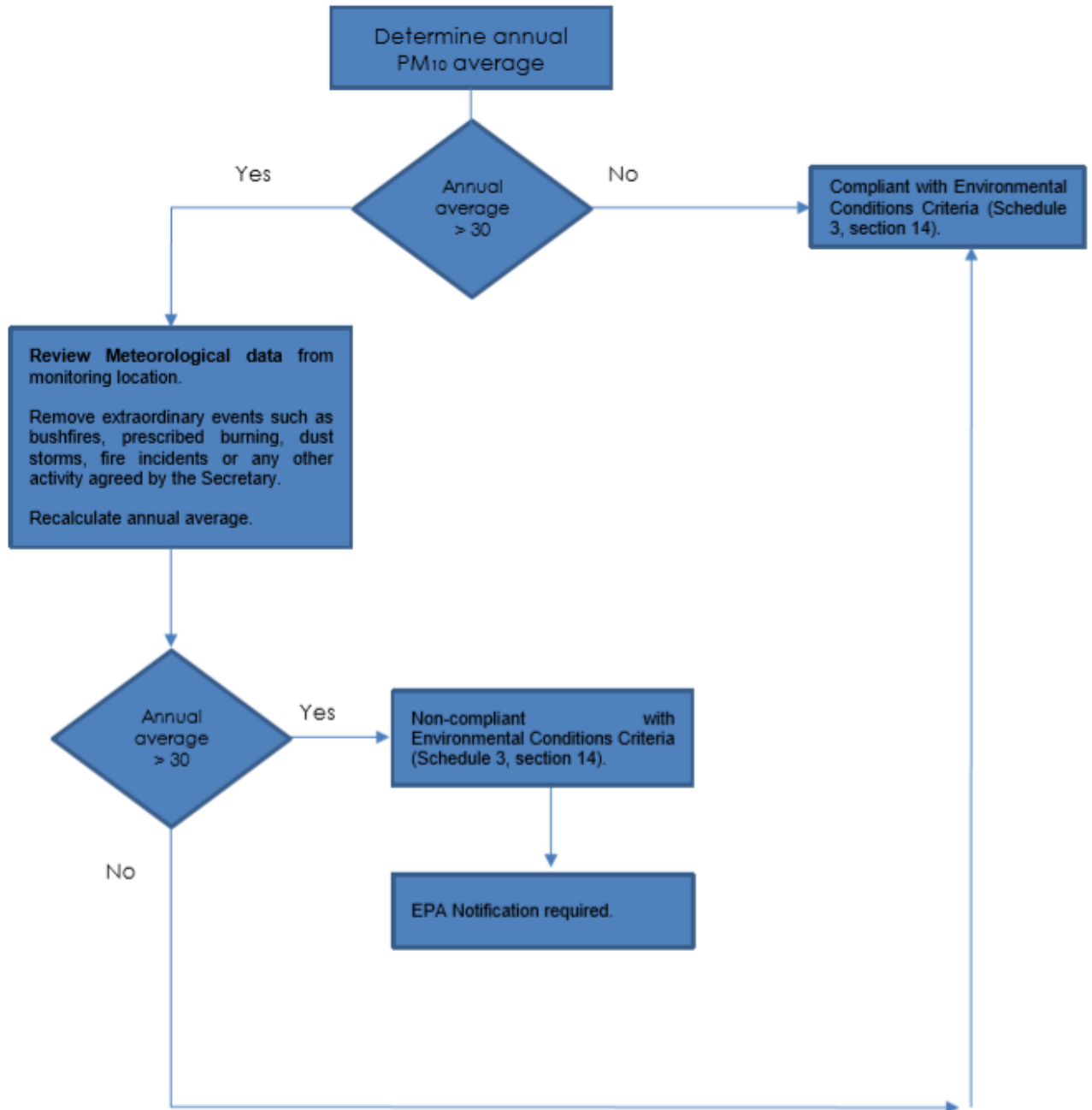


Figure 3: Flowchart for annual PM10 monitoring data evaluation.

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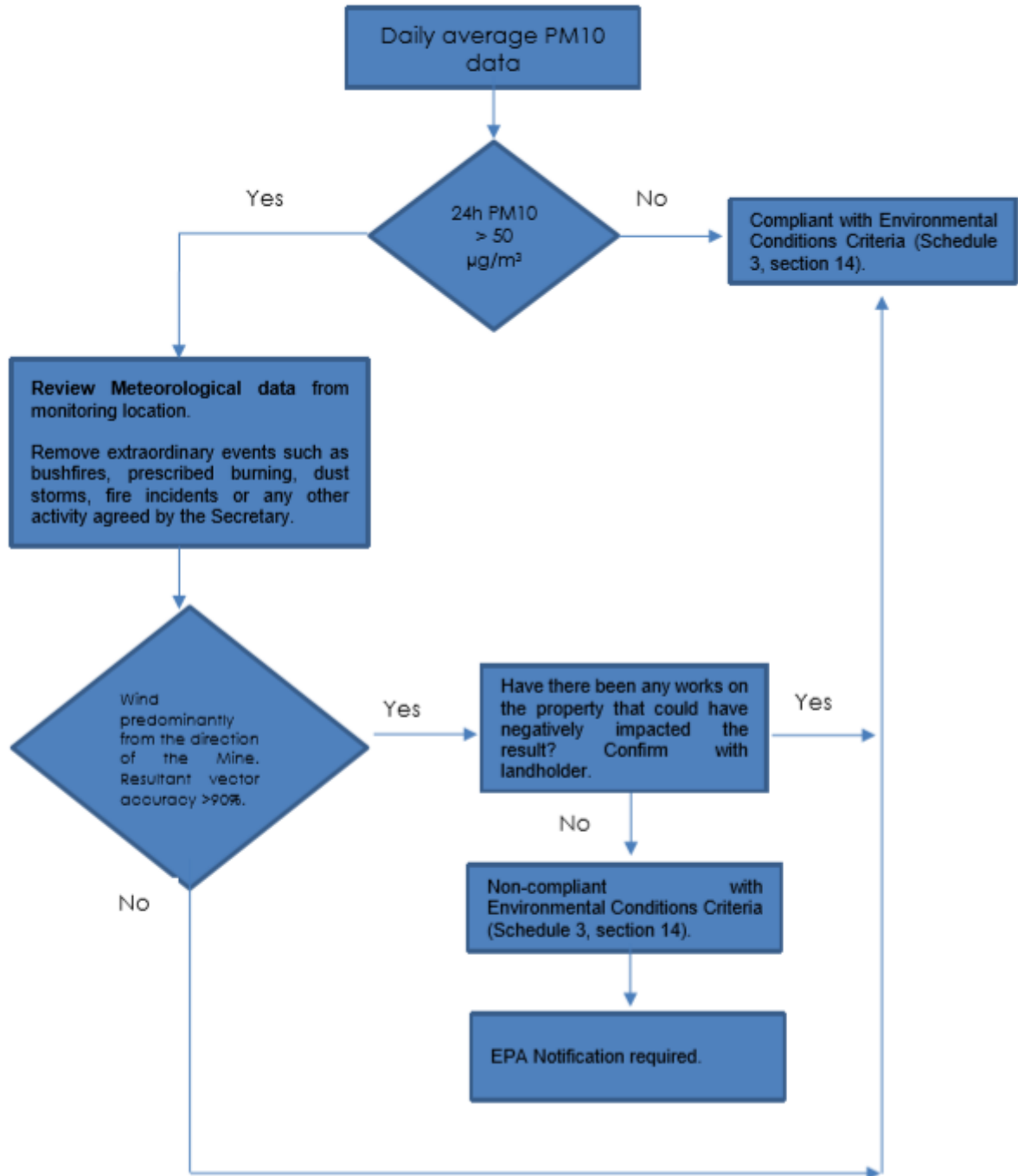


Figure 4: Flowchart for 24 hour PM10 monitoring data evaluation.

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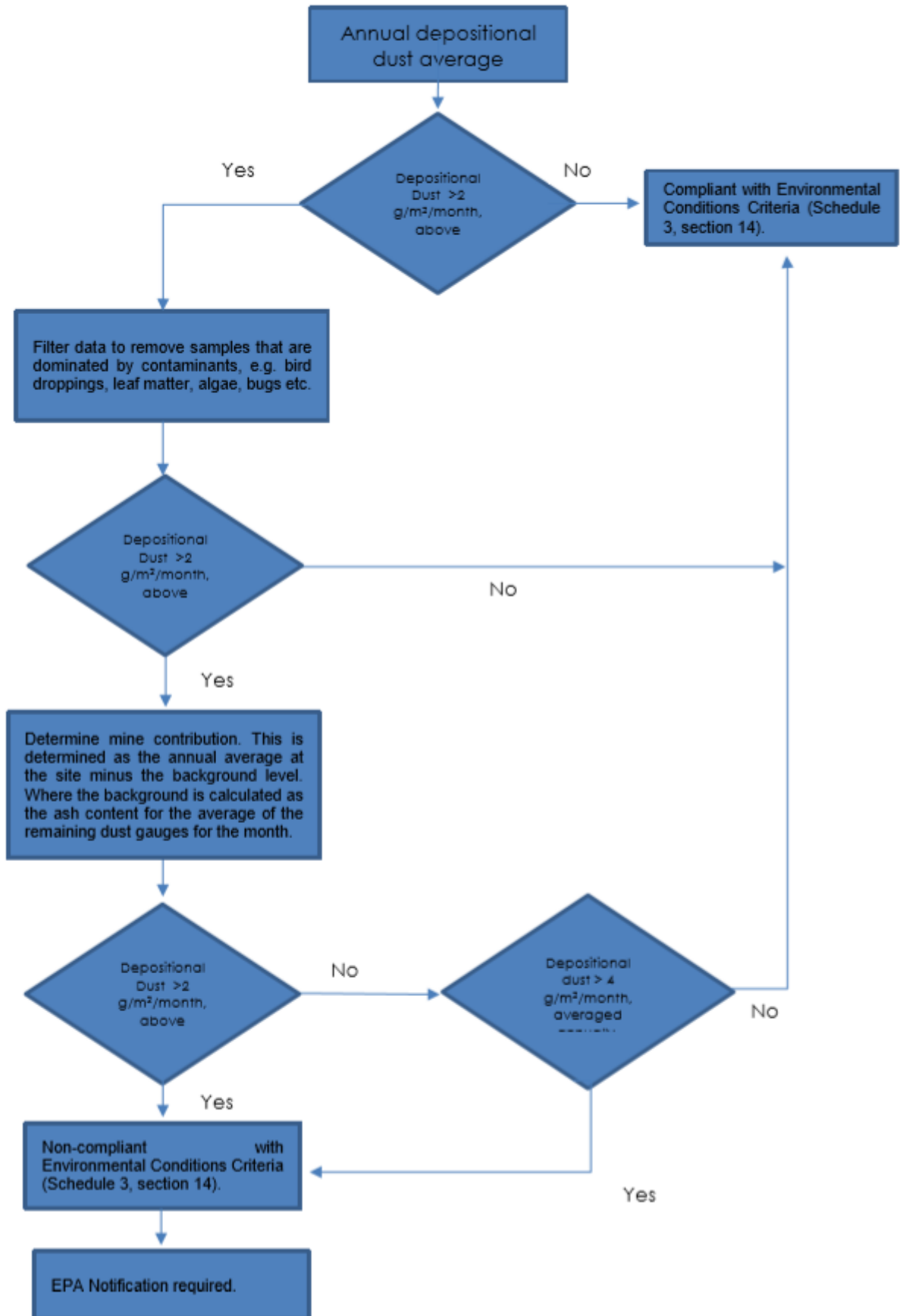


Figure 5: Flowchart for annual depositional dust data evaluation.

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10. AIR QUALITY INCIDENT RESPONSE

Where a dust reading is deemed an incident requiring reporting, as per protocols above, then the Northparkes Pollution Incident Response Management Plan will need to be implemented.

10.1 Pollution Incident Response Management Plan

Northparkes Pollution Incident Response Management Plan (PIRMP) is to be immediately implemented in the event that a pollution incident occurs at the Northparkes such that material harm to the environment is caused or threatened.

10.2 Pollution Incident Definition

A 'pollution incident' includes a leak, spill or escape of a substance, or circumstances in which this is likely to occur.

According to the POEO Act a pollution incident is defined as: an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

Pollution incidents causing or threatening material harm to the environment trigger the incident response measures below (including notification) and detailed in the Pollution Incident Response Management Plan.

Harm to the environment is material if:

1. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
2. it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000. Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

'Material harm' includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.

10.3 Incidents Causing or Threatening Harm to Environment

Part 5.7 of the Protection of the Environment Operations Act 1997 (POEO Act) specifies requirements relating to the notification of pollution incidents.

Under Part 5.7, the occupier of premises, the employer or any person carrying out the activity which causes a pollution incident must immediately notify each relevant authority when material harm to the environment is caused or threatened.

10.3.1 Internal Notification Protocol

All employees and contractors are legally required to assist Northparkes to meet EPA's notification requirement. Under the internal notification protocol, it is intended that the Northparkes People, Safety & Environment Manager (PS&E Manager) or Managing Director undertake external notification. The internal notification protocol allows external notification by other parties in the case that the PS&E Manager or Managing Director cannot be immediately contacted.

The potential material harm pollution incident must:

Immediately notify your Northparkes supervisor or Environment Phone (0458 042 391) or the Northparkes Access Control (02) 6861 3211 per the Northparkes Emergency Procedures. The supervisor or Environment Team member should then immediately notify the:

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- People, Safety & Environment Manager (PSE Manager); or
- Managing Director (in the absence of the PSE Manager).

Note: This can be any time 24hrs per day.

3. In the event that the supervisor or the Control Room Operator cannot be immediately contacted, contact the Environmental Superintendent immediately.
4. In the event the Environmental Superintendent or PSE Manager cannot be immediately contacted, the EPA require that the supervisor/employee/contractor/agent must notify the EPA immediately.

Note: In this instance, the PSE Manager and/ or the Managing Director should be contacted as soon as possible after notifying the EPA.

10.3.2 External Notification Protocol

After the internal notification protocol has been followed, the person undertaking external notification must immediately follow the below protocol:

1. Firstly, call 000 if the incident presents an immediate threat to human health or property. (Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents).
2. If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:
 - a) the EPA Environment Line 131 555 (the appropriate regulatory authority (ARA) for the activity under the POEO Act)
 - b) the Ministry of Health via the local Public Health Unit – (02) 4924 6477 (diverts to John Hunter Hospital) - ask for Public Health Officer on call
 - c) SafeWork – phone 13 10 50
 - d) Parkes Shire Council – phone:
 - Work Hours ph: 02 6861 2333
 - After Hours ph: 1800 648 585

The Department of Planning and Environment – Manager, Mining Projects – 1300 305 695 shall also be notified as soon as practicable.

10.3.3 Relevant Information

The relevant information about a pollution incident required under section 148 of the POEO Act consists of the following:

- the time, date, nature, duration and location of the incident,
- the location of the place where pollution is occurring or is likely to occur,
- the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
- the circumstances in which the incident occurred (including the cause of the incident, if known),
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

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10.3.4 Notifications to Landowners/Tenants

In the event there is an incident which poses a potential threat to surrounding property owners and occupiers, Northparkes will notify those likely to be affected as soon as practicable. Weekly weather predictions will allow Northparkes to notify neighbours of high-risk days in advance of potential dust impacts. This will be in conjunction with the Community Department.

The effected landowners will be notified in writing of any exceedance of environment monitoring criteria for air quality as required by the Development Consent 11_0060, within one week of obtaining results from the lab. In the instance of an exceedance of the air quality criteria, Northparkes will also send a copy of the NSW Health fact sheet entitled "Mine Dust and You" to the affected landowners and/or existing tenants of the land including the tenants on mine-owned land. Following notification of an exceedance, Northparkes will provide quarterly monitoring results to each of these parties until the results show that the project is complying with the criteria.

Northparkes will also notify all privately-owned land owners within 2 kilometres of the approved open cut mining pits that they are entitled to request an inspection to establish baseline condition assessments of any building or structures on their land. This will be undertaken 3 months before the commencement of open cut mining operations. Northparkes will include a copy of the NSW Health fact sheet entitled "Mine Dust and You" to the all landowners and/or existing tenants of the land including the tenants on mine-owned land.

Northparkes will also inform landowners of their rights under Development Consent 11_0060 before entering into any agreement on exceedances of dust and/or noise criteria. Northparkes will also provide information of the potential health and amenity impacts associated with living on the land and give landowners a copy of the NSW Health fact sheet entitled "Mine Dust and You".

10.4 Proactive Management – Planning for Adverse Weather

Northparkes operate a meteorological monitoring station, located within area ML 1367. Fifteen minute and 24-hour average wind speed, wind direction, air temperature, relative humidity, solar radiation, and rainfall are being monitored.

Weekly weather assessments are issued every Monday morning for the oncoming week's weather to alert the processing department and tailings project team of upcoming wind and weather events. The days are related on a traffic light system with high days rated in red. The Trigger Action Response Plan (TARP) will be implement for any week which is high risk rated and has the possibility to cause harm to the environment or adverse impact to community.

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Table 8: Trigger Action Response Plan (TARP)

Trigger Plan

Trigger Levels and Action Response Plans			
OFFSITE DUST EVENT			
Location	Normal	Level 1	Level 2
		Triggers	Triggers
Site Wide	<p>The day is forecast as being of normal risk, when there has been rain over the Site in the last 10 days. In addition, one or more of the following aspects should also hold true:</p> <ul style="list-style-type: none"> a) winds are expected to range between 0 – 3.6 m/s b) prevailing wind direction is north, north-east, east, south-east. c) day lies in the months of November to April. 	<p>The day is forecast as being of a moderate risk, when there has been no rain for 10 – 20 days over the Site. In addition, one or more of the following aspects should also hold true:</p> <ul style="list-style-type: none"> a) winds are expected to range between 3.6 – 8.8 m/s b) prevailing wind direction is south or south-westerly c) day lies in the months of May to June. 	<p>The day is forecast as being of a high risk, when there has been no rain for greater than 20 days over the Site. In addition, one or more of the following aspects should also hold true:</p> <ul style="list-style-type: none"> a) winds are expected to be greater than 8.8 m/s b) prevailing wind direction is west or northwesterly c) day lies in the months of August to October.

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Response Plan

Trigger Levels and Action Response Plans			
OFFSITE DUST EVENT			
Responsibilities	Normal	Level 1	Level 2
		Response	Response
Environmental Advisor	<ul style="list-style-type: none"> Track weather forecasts using online sources. Send out weekly weather assessment to Environment advisors; Environment and Farms Superintendent; Superintendent Ore Processing; OPD Personnel; Community and External Relations Advisor; OPD shift Supervisors; Ore Processing Superintendent; Manager – Ore Processing; Manager – People, Safety and Environment; and Project Manager – Tailings. Weekly weather forecast is reviewed daily against the latest weather predictions, and if conditions have been deemed to be significantly different (i.e. change in risk rating) to those that were originally predicted at the start of the week, then a revised weather forecast is circulated. 	<ul style="list-style-type: none"> Track weather forecasts using online sources. Send out weekly weather assessment to Environment advisors; Environment and Farms Superintendent; Superintendent Ore Processing; OPD Personnel; Community and External Relations Advisor; OPD shift Supervisors; Ore Processing Superintendent; Manager – Ore Processing; Manager – People, Safety and Environment; and Project Manager – Tailings. Weekly weather forecast is reviewed daily against the latest weather predictions, and if conditions have been deemed to be significantly different (i.e. change in risk rating) to those that were originally predicted at the start of the week, then a revised weather forecast is circulated. 	<ul style="list-style-type: none"> Track weather forecasts using online sources Send out weekly weather assessment to Environment advisors; Environment and Farms Superintendent; Superintendent Ore Processing; OPD Personnel; Community and External Relations Advisor; OPD shift Supervisors; Ore Processing Superintendent; Manager – Ore Processing; Manager – People, Safety and Environment; and Project Manager – Tailings. Weekly weather forecast is reviewed daily against the latest weather predictions, and if conditions have been deemed to be significantly different (i.e. change in risk rating) to those that were originally predicted at the start of the week, then a revised weather forecast is circulated. If mine generated dust is witnessed offsite, notify the EPA (Dubbo) of nuisance dust outside the Mine Lease.
Community and External Relations Advisor	No action	No action	Notify all sensitive receptors in the receiving environment of potential dust impacts.
OPD Personnel	No action	<ul style="list-style-type: none"> Where the option of tailings deposition is available i.e. Rosedale, ensure infrastructure is ready and operational. Report and log any changes in dust levels on and around the TSF facilities through to shift supervisor. 	<ul style="list-style-type: none"> Where the option of tailings deposition is available (i.e. Rosedale, Estcourt and TSF Infill), wet TSF surface with tailings. Report and log any changes in dust levels on and around the TSF facilities through to shift supervisor.

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Trigger Levels and Action Response Plans			
OFFSITE DUST EVENT			
Responsibilities	Normal	Level 1	Level 2
		Response	Response
OPD Team Leaders	<ul style="list-style-type: none"> Adhere to daily plan Continue with TSF inspections Ensure all people are aware of operating procedures Report any unforeseen dust issues.. 	<ul style="list-style-type: none"> Notify Superintendent Ore Processing of any changes in dust levels on and around the TSF facilities within 1 hour. Verbally notify oncoming shift supervisor of upcoming dust risk. Make preparations (all materials on hand) to assist with TSF related dust suppression. 	<ul style="list-style-type: none"> As per Level 1 Resposne Monitor extent and development of dust levels in area. Report to Superintendent Ore Processing. Verbally notify oncoming Shift Supervisor
Ore Processing Superintendent	<ul style="list-style-type: none"> Adhere to daily plan 	<ul style="list-style-type: none"> Review situation and action required with environmental support Plan and manage operating requirements 	<ul style="list-style-type: none"> Plan and manage appropriate operating requirements and installation of additional support where necessary If forecast is for continued strong wind, notify area manager Review situation and action required with Environment team. Facilitate the operation of tailings deposition

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10.5 Community Liaison

Northparkes recognises that dust generated by mining activities can impact on adjacent properties and communities.

A community relations program (via the Neighbours Meetings and Community Consultative Committee) shall be maintained to ensure two-way communication on air quality management. Neighbours will be notified as soon high risk days are predicted through weekly meteorological assessments.

Prior to construction activities, Northparkes will contact nearby residents to outline the nature and duration of works and to provide contact details should they have any queries. All dust complaints will be registered, investigated and responded to promptly.

11. REPORTING

Air quality monitoring results are reviewed by the Environment Advisor within two weeks of collecting the data and a results summary provided to the Environment Superintendent.

The results of the monitoring program and any complaints received are communicated to relevant personnel and externally communicated through the Annual Review which is made publicly available on the website (<http://www.northparkes.com>).

Incident reporting (including any exceedances and complaints) will be in accordance with Condition 7, Schedule 6 of Northparkes Development Consent 11_00060, and the Procedure Incident Management (PRO-0148).

12. REGULATORY REQUIREMENTS

The Air Quality Management Plan (AQMP) addresses the relevant components of schedule 3 conditions 14 – 18 of the Northparkes Development Consent (PA11_0060). These conditions are outlined in Table 9 and Table 10 below.

Table 9: NSW Development Consent Conditions

Requirement	Northparkes Reference
Air Quality Criteria	
Condition 14. The Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not cause exceedances of the criteria listed in Table 3, Table 4 and Table 5 at any residence on privately-owned land.	Section 5.2.1

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Requirement	Northparkes Reference																							
<table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>^dCriterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>≈ 90 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>Annual</td> <td>≈ 30 µg/m³</td> </tr> </tbody> </table> <p>Table 4 Short term impact assessment criterion for particulate matter</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>^dCriterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>24 hour</td> <td>≈ 50 µg/m³</td> </tr> </tbody> </table> <p>Table 5 Long term impact assessment criteria for deposited dust</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Maximum increase² in deposited dust level</th> <th>Maximum total¹ deposited dust level</th> </tr> </thead> <tbody> <tr> <td>^cDeposited dust</td> <td>Annual</td> <td>≈ 2 g/m²/month</td> <td>≈ 4 g/m²/month</td> </tr> </tbody> </table> <p>Notes to Table 3-Table 5</p> <p>a) Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources);</p> <p>b) Incremental impact (i.e. incremental increase in concentrations due to the development on its own);</p> <p>c) Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method; and</p> <p>d) Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Secretary.</p>	Pollutant	Averaging period	^d Criterion	Total suspended particulate (TSP) matter	Annual	≈ 90 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	Annual	≈ 30 µg/m ³	Pollutant	Averaging period	^d Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	≈ 50 µg/m ³	Pollutant	Averaging period	Maximum increase ² in deposited dust level	Maximum total ¹ deposited dust level	^c Deposited dust	Annual	≈ 2 g/m ² /month	≈ 4 g/m ² /month	
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^c Deposited dust	Annual	≈ 2 g/m ² /month	≈ 4 g/m ² /month																					
Schedule 3																								
<p>Condition 15. The Proponent shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not cause exceedances of the criteria listed in Table 3, Table 4 and Table 5 at any occupied residence on mineowned land unless:</p> <p>a) the tenant has been notified of any health risks associated with such exceedances in accordance with the notification requirements under schedule 5 of this approval;</p> <p>b) the tenant of any land owned by the Proponent can terminate their tenancy agreement without penalty at any time, subject to giving reasonable notice;</p> <p>c) air mitigation measures such as air filters, a first flush roof water drainage system and/or air conditioning) are installed at the residence, if requested by the tenant;</p> <p>d) air quality monitoring is regularly undertaken to inform the tenant of the actual particulate emissions at the residence; and</p> <p>e) data from this monitoring is presented to the tenant in an appropriate format for a medical practitioner to assist the tenant in making informed decisions on the health risks associated with occupying the property, to the satisfaction of the Secretary.</p>	Section 6																							
<p>Condition 16. The Proponent shall:</p> <p>a) implement best management practice to minimise the off-site odour, fume and dust emissions of the project</p> <p>b) implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site</p> <p>c) minimise any visible off-site air pollution generated by the project</p> <p>d) minimise the surface disturbance of the site</p> <p>e) operate a air quality management system that uses a combination of predictive meteorological forecasting and real-time air quality monitoring data to guide the day to day planning of mining operations and the implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this approval</p> <p>f) minimise the air quality impacts of the project during adverse meteorological conditions and extraordinary events (see Noted above under Table 5);</p> <p>To the satisfaction of the Secretary.</p>	Section 6 & 7																							

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Requirement	Northparkes Reference
<p>Condition 17. The Proponent shall prepare and implement an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by 30 June 2014;</p> <p>b) describe the measures that would be implemented to ensure compliance with the relevant air quality criteria and operating conditions of this approval;</p> <p>c) describe the air quality management system;</p> <p>d) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> • adequately supports the air quality management system; • evaluates and reports on the: <ul style="list-style-type: none"> – the effectiveness of the air quality management system – compliance with the air quality criteria – compliance with the air quality operating conditions; and <ul style="list-style-type: none"> ○ defines what constitutes an air quality incident, and includes a protocol for identifying and notifying the Department and relevant stakeholders of any air quality incidents 	Section 6, 7 & 8
<p>Condition 18. For the life of the project, the Proponent shall ensure that there is a meteorological station in the vicinity of the site that:</p> <p>a) complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline; and</p> <p>b) is capable of continuous real-time measurement of stability class in accordance with the NSW Industrial Noise Policy, unless a suitable alternative is approved by the Secretary following consultation with the EPA</p>	Section 7.2
Schedule 5	
<p>Condition 3. As soon as practicable after obtaining monitoring results showing:</p> <p>(a) an exceedance of any relevant criteria in schedule 3, the Proponent shall notify affected landowners in writing of the exceedance, and provide regular monitoring results to each affected landowner until the project is again complying with the relevant criteria; and</p> <p>(b) an exceedance of the relevant air quality criteria in schedule 3, the Proponent shall send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected tenants of the land (including the tenants of any mine-owned land).</p>	Section 9

Comments from Regulators

On 01 September 2015, Northparkes received comments from Department of Planning and Environment (DPE) requesting Northparkes to amend additional information in the Air Quality Management Plan. The comments are detailed in Table 10 along with Northparkes comments for each component of the Condition is addressed within this document.

Table 10: Regulatory Comments

Comments	Section
Additional procedures of Schedule 5 need to be incorporated.	Section 9
Last dot point of Schedule 3 Condition 17 (d) not adequately addressed.	Section 9

On 26 November 2015, Northparkes received comments from the DPE requesting Northparkes to amend further changes with the Management Plan submitted in October 2015. The comments are detailed in Table 11 along with Northparkes responses for each component of the Condition addressed within this document.

Table 11: Regulatory comments on 26 November 2015

Requirement	Section
<ul style="list-style-type: none"> • Last dot point of Schedule 3 Condition 17 (d) still inadequately addressed. Section 9 defines a pollution incident and includes a protocol for managing this. However, this needs to focus on an air quality incident - essentially an exceedance of the air quality criteria. Protocols for identifying and notifying the Department and relevant stakeholders should relate to an air quality incident specifically. 	Section 8

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On 11 March 2016, Northparkes received comments from the DPE requesting Northparkes to amend further changes with the Management plan submitted on 17 February 2016. The comments are detailed in Table 12 along with Northparkes responses for each component addressed within this document.

Table 12: Regulatory comments on 7 March 2016

Requirement	Section
Evidence of consultation with the EPA should be provided	Appendix 1
The meteorological monitoring station has the potential to trigger early investigation and response before air quality levels are exceeded. Please identify how this is being used to facilitate proactive and adaptive management of air quality	Section 9.4
Section 11 refers to the frequency of updates to the Air Quality Management Plan. This should also include the requirements under Schedule 6, condition 5.	Section 11

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13. REVIEW / CONTINUOUS IMPROVEMENT

Northparkes will strive to continually improve on the mine's environmental performance by applying the principles of best practice to mining operations, including where cost-effective and practicable, the adoption of new best practice technologies and improved air quality control measures.

The Air Quality Management Plan will be reviewed and updated annually or in the case of a significant operational change. The review will include an assessment of the effectiveness of control measures and performance against the Plan's objectives.

The objectives of a review are:

- to maintain compliance with statutory requirements
- to identify opportunities for improvement in the management plan
- incorporate community considerations

The Northparkes review will include:

- this Document
- Legislation, Approval, Licence changes
- community complaints and enquiries
- Neighbour Meetings
- Community feedback.

Northparkes will review, and if necessary revise the Air Quality Management Plan within 3 months of:

- the submission of an annual review;
- the submission of an incident report;
- the submission of an audit report; or
- any modification to the conditions of this approval.

Where this review leads to revisions in the Air Quality Management Plan, then within 4 weeks of the review the revised document will be submitted to the Secretary for approval.

14. REFERENCE MATERIALS

Table 13: Reference Materials

Document Title	ID No.
Environmental Monitoring and Measuring Schedule	REG-0008
Depositional Dust Monitoring Work Instruction	WKI-0180
High Volume Air Sampling Monitoring Work Instruction	WKI-0192
Heggies Pty Ltd (2007) Northparkes Air Quality and Meteorological Monitoring Programs	
Minimising Dust Training Module	
Stakeholder Management Plan	PLN-0040
Annual Review	
AS3580.1.1:2007 Methods for sampling and analysis of ambient air. Part 1.1: Guide to siting air monitoring equipment.	
AS3580.9.3:2003 Methods for sampling and analysis of ambient air. Determination of suspended particulate matter – Total suspended particulate matter (TSP) – High volume sampler gravimetric method	
AS3580.10.1:2003 Methods for sampling and analysis of ambient air – Determination of particulate matter – Deposited matter – Gravimetric method	

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Document Title	ID No.
Northparkes Development Consent 11-0060	
Corkery, R.W. (2006) Environmental Assessment Northparkes – E48 Project.	2006
Heggies Australia Pty Ltd. (2006). Northparkes – E48 Project Air Quality Assessment	2006
Umwelt (2013) Northparkes Step Change Project, Environmental Assessment Vol. 1	31-11769
Umwelt (2013) Northparkes Step Change Project, Environmental Assessment Vol. 2	31-11761
Northparkes Environmental Protection Licence EPL 4784	
NSW Department of Environment and Climate Change (2005). Approved Methods and Guidance for Modelling and Assessment of Air Pollutants in New South Wales.	2005
NSW Department of Environment and Climate Change (2005). Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.	2005

15. ATTACHMENTS

15.1 Appendix 1 – Consultation with Environment Protection Agency (EPA)

From: Ramakrishnappa, Bharath (NPM) [mailto:Bharath.Ramakrishnappa@northparkes.com]
Sent: Monday, 25 August 2014 2:35 PM
To: Tanswell Bradley; Gibson Michelle
Cc: EPA North Far West Operations Unit Mailbox
Subject: Project Approval 11_0600 - Management Plans for Approval

Hi Brad,

Northparkes Mines (NPM) submit for your approval the Management Plans (Air, Noise and Blast) as per the requirements in the new Project Approval (11-0600). Please find the management plans in the attached. If you can review and get back with any comments by 5th September 2014 it would be appreciated. I would send the Water Management Plan in the next email as it's a large document.

I have also handed the hard copies of the Management Plans to Michelle Gibson.

If you have any questions please contact Michael Priest (Superintendent Environment & Farm) on 02 661 3264 / Michael.priest@northparkes.com as I will away from 26 Aug to 22 September.

Regards
Bharath



Tue 25/08/2014 2:54 PM

Ramakrishnappa, Bharath (NPM)

RE: Project Approval 11_0600 - Management Plans for Approval

To: Michelle Gibson

Hi Michelle,

NPM have submitted for your approval the Management Plans (Air, Noise and Blast) on 25 August 2014 for approval. Can we get the comments/feedback for the management plans. If EPA is satisfied with the Management Plans, can we get an letter of approval from EPA for all the management plans.

Regards
Bharath

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20 August 2014

Mr Bradley Tanswell
Environment Protection Authority – South West
PO Box 2111
DUBBO NSW 2830

Attention: Bradley Tanswell

Dear Bard

Re: Northparkes Mines Project Approval 11_0600

Northparkes Mines (NPM) submits for your approval the Air Quality Management Plan as per the requirements under Schedule 3, Condition 17 of the new Project Approval 11_0600 outlined below:

The Proponent shall prepare and implement a Final air quality Management Plan for the project to the satisfaction of the Secretary. This plan must:

- a) *be prepared in consultation with the EPA, and submitted to the Secretary for approval by 30 June 2014;*

As the Project Approval (11_0600) was granted on 16 July 2014, the due date for submission of this Management Plan of 30 June 2014 cannot be satisfied.

It would be appreciated if you could provide any comments against the Air Quality Management Plan in writing by Friday 5th September 2014. If no comments have been received by this date the Management Plan will be implemented as of 5 September 2014.

If there are any questions with regard to this submission please contact Michael Priest (Superintendent Environment and Farms) on (02) 6861 3264.

We look forward to receive your comments.

Yours faithfully
NORTHPARKES MINES



ROB CUNNINGHAM
Manager – Health, Safety, Environment & Farms

Attachments:
Air Quality Management Plan