



Illawarra Coal



# Dendrobium Mine Air Quality Management Plan

DENMP0037

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## VERSION HISTORY

VERSION	DESCRIPTION OF CHANGES	DATE
1.0	Original Document	November 2004
2.0	Update following PRP9 and Department of Planning Compliance Audit	October 2016
3.0	Three yearly review as required by Development Consent	March 2008
4.0	Review as required by the revised Development Consent (issued 8 December 2008)	April 2009
5.0	Three yearly review as required by Development Consent and to reflect changes in Licenses monitoring point within the Environmental Protection Licence (removal of point 15)	March 2012
6.0	Removed Dust Deposition monitoring sites Point 10 and Point 12 following EPL 324 variation.	June 2014
7.0	The following changes have been made: <ul style="list-style-type: none"> <li>Updated roles and responsibilities</li> <li>References to parent company changed</li> <li>Update in accordance with Development Consent</li> </ul>	January 2018
7.1	<ul style="list-style-type: none"> <li>Updated roles and responsibilities</li> <li>References to parent company changed</li> <li>Update in accordance with Development Consent</li> </ul>	June 2018

## PERSONS INVOLVED IN THE REVIEW OF THIS PLAN INCLUDE:

NAME	TITLE	EXP (YRS)
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## REPRESENTATIVES FROM EXTERNAL ORGANISATIONS AND REGULATORY AGENCIES INVOLVED IN THE PREPARATION OF THE ORIGINAL MANAGEMENT PLAN:

ORGANISATOIN	TITLE
NSW EPA	Head Regional Operations
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## 1 INTRODUCTION

### 1.1 Background

This Air Quality Management Plan (AQMP) addresses the management of dust associated with the operation of the mine and associated infrastructure. It describes the actions that are undertaken to effectively manage fugitive dust emissions in line with the sites Environment Protection Licence (EPL) 3241 and Schedule 4, Condition 10 of the Development Consent.

Air quality performance of the mine is determined by a number of factors:

- Design features that have been built into the mine that control the emission of dust; and
- Operational practices that control the emission of dust.

Monitoring programs that measure the levels of dust in the ambient air are used to provide guidance on the performance of the mine. This information is periodically supplied to the Community Consultative Committee (CCC) and the local community (via website) and reported annually in Annual Returns and the Annual Review.

### 1.2 Scope

The scope of this management plan includes the following sites and facilities:

**Dendrobium Pit Top** - consists of administration building, workshop, machinery and equipment storage areas, people and materials access to the underground workings via the Dendrobium Tunnel, a sedimentation pond and grey water treatment and Oil Water Separation facility.

**Kemira Valley Coal Loading Facility** – the KVCLF receives coal from underground via the Kemira Valley Tunnel. Coal is transported from underground to KVCLF via a conveyor network into a coal sizer. The coal travels a further 200 metres via a partially enclosed surface conveyor, to the 150,000 tonne stockpile via a rill tower. Coal loading to trains takes place via an enclosed gravity-feed system within the tunnel that runs under the stockpile.

**Ventilation Shaft Number 1** - The No.1 ventilation shaft, located within the Metropolitan Special Area administered by WaterNSW (WNSW), operates as a downcast shaft (i.e. drawing fresh air into the underground workings). The No. 1 vent shaft is on land owned by Illawarra Coal.

**Ventilation Shafts Number 2 and 3** – Also located within the WaterNSW Metropolitan Special Area and within Mining Lease ML1566. Construction of the No.2 and 3 ventilation shafts was completed during 2008. The No.2 shaft operates as an additional downcast shaft whilst the No.3 shaft operates as an upcast shaft.

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## 2 OBJECTIVES

The objectives of the AQMP are to:

- Comply with all regulatory requirements set out in the Development Consent conditions and Environmental Protection Licence 3241;
- Define measures to minimise dust emissions;
- Provide an overview of the air quality monitoring program; and
- Outline the process for investigating air quality complaints and implementing solutions to address complaints.

## 3 ROLES AND RESPONSIBILITIES

Roles and responsibilities associated with environmental management at Dendrobium Mine are defined in the Dendrobium Mine Environmental Management Strategy. The roles and responsibilities specific to the development, implementation and review of this plan are outlined in Table 1.

**Table 1: Roles and Responsibilities**

Responsibilities	Role
Development and periodic review of this Management Plan.	Environmental Supervisor
Meeting the commitments contained within this management plan for the operational areas.	Environmental Officer
Meeting the commitments contained within this management plan for stakeholder engagement.	Manager External Affairs and Communications

## 4 LEGISLATIVE AND OTHER REQUIREMENTS

### 4.1 Legislative Requirements

Legislation relating to the management of air quality includes:

- Protection of the Environment Operations Act 1997 (POEO Act);
- Protection of the Environment Operations (General) Regulation 2009; and
- Protection of the Environment Operations (Clean Air) Regulation 2010.

### 4.2 Environmental Protection Licence Requirements

Environmental Protection Licence 3241 applies to the Dendrobium Mine premises and associated activities, and contains conditions pertaining to air quality. A copy of the licence is accessible via the following link:

<http://www.epa.nsw.gov.au/prpoeoapp/ViewPOEOLicence.aspx?DOCID=33858&SYSUID=1&LICID=3241>

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### 4.3 Development Consent Conditions

This AQMP has been developed in accordance with Schedule 4 of the Dendrobium Mine Development Consent. A copy of the Development Consent is available on the South32 website (regulatory page), accessible via the following link:

<https://www.south32.net/what-we-do/places-we-work/illawarra-metallurgical-coal/documents>

### 4.4 South32 & Other Policies

This AQMP has been developed to be consistent with principles of the following:

- South32 Sustainability Policy and Environment Standard.
- Dendrobium Mine's environmental management system has been certified to ISO14001.

## 5 MANAGEMENT STRATEGIES

### 5.1 Baseline Air Quality Management

An Air Quality Impact Assessment for the Dendrobium operations was completed in 2000 by Holmes Air Sciences as part of the original Dendrobium Project Environmental Impact Study (refer to Volume 4 of the EIS). The assessment used a computer-based dispersion model, with local meteorological data and estimates of dust emissions, to predict the concentration and deposition rate of particulate matter from activities associated with the Dendrobium operations.

The assessment was used as a basis for the identification and implementation of suitable management strategies to control fugitive dust emissions and/or odour issues associated with the Dendrobium operations. The strategies are outlined in section 5.3 of this management plan.

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## 5.2 Operational Activities and Controls

**Table 2: Operational activities and potential air quality issues**

Aspect	Site	Potential Source	Cause	Controls
Fugitive Dust	Kemira Valley	Stockpile and conveyors	Loading coal to the stockpile	<ul style="list-style-type: none"> <li>- Reduced drop height (rill tower)</li> <li>- Moisture content maintained at &gt;8%</li> <li>- Automated rill tower spray system</li> <li>- Coal clearance suppression system</li> <li>- Conveyors and conveyor transfer points are covered and/or partially enclosed</li> <li>- Scrapers are used to clean the return conveyor</li> </ul>
		Stockpile	Bulldozer/loader operation	<ul style="list-style-type: none"> <li>- Travel route and materials moist</li> </ul>
		Stockpile	Wind erosion	<ul style="list-style-type: none"> <li>- Automated Dust Suppression System</li> </ul>
		Train loading	Loading coal to trains	<ul style="list-style-type: none"> <li>- Enclosed train loading</li> <li>- Moisture content maintained at &gt;8%</li> </ul>
	Dendrobium Pit Top	Coal Sizer	Emissions from ventilation air	<ul style="list-style-type: none"> <li>- Enclosed and mechanically ventilated with the ventilation air passed through a fabric filter</li> </ul>
		Fugitive emissions from mine activities	Movement of vehicles along portal road	<ul style="list-style-type: none"> <li>- The majority of trafficable surfaces on the Pit Top are sealed and are swept by a vacuum sweeper truck on a regular basis</li> <li>- An automatic fixed water spray system is in operation along the mine portal road to suppress dust</li> </ul>
		Ventilation fans	Fugitive emissions	<ul style="list-style-type: none"> <li>- Dust suppression sprays on underground mining equipment</li> <li>- Maintenance of travel roads</li> </ul>
	Kemira Rail Line	Coal in wagons	Fugitive emissions	<ul style="list-style-type: none"> <li>- Coal profile</li> <li>- Moisture content of product</li> <li>- Train speed</li> </ul>
Odour	Dendrobium Fan Site	Fugitive emissions from mine activities	Shale oil aromatics	<ul style="list-style-type: none"> <li>- No controls are required at this stage due to low odour levels and the remote location of fans. No complaints have been received</li> </ul>

## 5.3 Management Strategy Effectiveness

The effectiveness of the existing controls is reviewed on an annual basis as part of the Environmental Aspects and Impacts Register review.

In addition to the annual review, a number of additional reviews have been undertaken to target specific areas of the site. The additional reviews that have been undertaken (to date) are listed below:

- “Air Quality Monitoring and Analysis near Kemira Valley Coal Loading Facility (2006).”
- Review of coal dust management practices at the Kemira Valley stockpile in 2007. Improvements implemented including lowering the coal loading profile in train wagons, more frequent dust suppression spraying in hotter months (September - April), change to better spray heads for the rill tower sprays, and improvements in the conveyor wash down procedures.
- “Dendrobium Mine Particulate Matter Control Best Practice Pollution Reduction Program (2012)”

The effectiveness of design and operation of controls are also assessed as part of the Triennial Independent Environmental Audit (as required under Schedule 8, Condition 6 of the Development Consent).

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The geo-mechanical properties of coalwash have also been established to ensure that the product does not cause unintentional environmental consequences when emplaced or beneficially reused.

## 6 MONITORING AND REVIEW PROGRAM

The objective of the monitoring program is to provide information on fugitive dust levels in the vicinity of Dendrobium operations and to provide guidance on the effectiveness of current controls. Refinement of the monitoring programs may occur due to changes in:

- Operational activities;
- Air quality; and
- Community feedback.

### 6.1 Air Quality Criteria

Air quality criteria applicable to Dendrobium operations, as outlined in Schedule 4, Condition 9 of the Development Consent, are outlined in the tables below.

**Table 3: Long term impact assessment criteria for particulate matter**

Pollutant	Averaging Period	Criterion
Total Suspended Particulate (TSP) Matter	Annual	90 µg/m <sup>3</sup>
Particulate Matter < 10 µm (PM <sub>10</sub> )	Annual	30 µg/m <sup>3</sup>

**Table 4: Short term impact assessment criteria for particulate matter**

Pollutant	Averaging Period	Criterion
Particulate matter <10 µm (PM <sub>10</sub> )	24 hour	50 µg/m <sup>3</sup>

**Table 5: Long term impact assessment criteria for deposited dust**

Pollutant	Averaging Period	Maximum increase in deposited dust level	Maximum total deposited dust level
Deposited Dust	Annual	2 g/m <sup>2</sup> /month	4 g/m <sup>2</sup> /month

*Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia, 1991, AS/NZS 3580,10,1-2003: Methods for Sampling and Analysis of Ambient Air – Determination of Particulates – Deposited Matter – Gravimetric Method.*

### 6.2 Air Quality Monitoring Program

Compliance monitoring against the air quality criteria detailed in the tables above is conducted at sites throughout Mt Kembla and Kembla Heights and is reviewed monthly. Monitoring currently undertaken includes:

- Dust deposition monitoring;
- Microscopic (visual) analysis of deposition samples;

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- Monitoring of the concentrations of Total Suspended Particulates (TSP); and
- Monitoring of the concentrations of particulate matter less than 10 µm (PM10).

The monitoring network comprises:

- Five dust deposition gauges measuring monthly deposition and microscopic analysis. Microscopic analysis determines the percentage contribution of mineral dirt, coal, fibrous material, metal, insect and vegetation; and
- Two sites where 24-hour average TSP and PM10 concentrations are measured monthly using High Volume Air Samplers (HVAS).

The gauges and samplers provide information that allows air quality in the nearby residential area to be determined either directly or to be inferred. The network of deposition gauges and samplers are maintained and operated in line with the relevant Australian Standards (where possible).

The specific locations of each of the dust monitoring stations are outlined in Table 6 and Figure 1.

**Table 6: EPL Required Dust Deposition Gauges**

Site	Type of Monitoring	GPS Coordinates*		Description
		Easting	Northing	
Point 6	Dust Deposition	300928	6188716	Figtree Farm, O'Briens Road, Figtree
Point 9	Dust Deposition	299434	6187701	Mt Kembla Public School, Mt Kembla
Point 13	Dust Deposition	298830	6188007	Portal Road, Pit Top site
Point 17	Dust Deposition	300350	6187985	206 Cordeaux Road, Mt Kembla
Point 18	Dust Deposition	300344	6189321	Old Loading Bins, KVCLF
Point 20	High Volume Air Sampler	300273	6188795	Located at the entrance to KVCLF
Point 21	High Volume Air Sampler	298680	6187770	Located on top of the Bathhouse building (Pit Top site)

\* Coordinates using GDA 1994, MGA Zone 56 projection

The data from the air quality monitoring program is reviewed and checked against the relevant criteria (refer to Section 6.1) monthly. Exceedances of the criteria are investigated with details reported both internally and externally in accordance with internal South32 requirements and legislative requirements (refer to Section 7 of this plan).

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### 6.3 Meteorological Monitoring

Meteorological stations are located at the Vent Shaft 2/3 site, Kemira Valley Coal Loading Facility and Dendrobium Mine. The main parameters measured are outlined in Table 7.

**Table 7: Meteorological parameters and locations.**

Parameter	Locations
Wind speed	Vent Shaft 2/3, Pit Top, KVCLF
Wind Direction	Vent Shaft 2/3, Pit Top, KVCLF
Temperature	Vent Shaft 2/3, Pit Top, KVCLF
Rainfall	Vent Shaft 2/3, KVCLF

### 6.4 Air Quality Monitoring Program Review

The air quality monitoring program is generally reviewed on a triennial basis as part of the Triennial Independent Environment Audit process. A detailed review of the air quality data and associated community complaints was undertaken in 2009. Compliance levels achieved at each of the dust monitoring sites, for the period from 2006 to 2008 were reviewed. Recommendations included the removal of a number of monitored dust deposition gauges as shown in Table 8.

The Triennial Independent Environmental Audit by KADENZ Pty Ltd in December 2011 recommended the removal of Point 15 due to its proximity to the motor cross park.

A further two dust deposition sites, Point 10 and Point 12, were removed from the monitoring program in May 2014 following an internal review of the long term dust levels and compliance against the relevant criteria at these locations. The requirement to monitor deposition dust at these sites was removed from Environment Protection Licence 3241 in May 2014 (Licence Variation Notice: 1521876).

**Table 8: Monitoring sites that have been removed**

Location	GPS Coordinates		Address	Date removed	Reason
	Easting	Northing			
Point 7	299771	6188869	Stones Road, Mt Kembla	February 2009	Refer to PAE Holmes Report: dated 28/1/09
Point 8	299918	6188337	26 Stones Road, Mt Kembla	February 2009	Refer to PAE Holmes Report: dated 28/1/09
Point 10	298982	6187685	374 Cordeaux Road, Mt Kembla	May 2014	Internal Review, April 2014 EPL Variation: 1521876
Point 11	298040	6187427	Windy Gully, Kembla Heights	February 2009	Refer to PAE Holmes Report: dated 28/1/09
Point 12	298666	6188095	55 Harry Graham Drive, Kembla Heights	May 2014	Internal Review, April 2014 EPL Variation: 1521876

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Location	GPS Coordinates		Address	Date removed	Reason
	Easting	Northing			
Point 14	298945	6188348	Old Mine Managers Residence, Kembla Heights	February 2009	Refer to PAE Holmes Report: dated 28/1/09
Point 15	299381	6189589	O'Briens Gap East, Harry Graham Drive, Kembla Heights	February 2012	Refer to Independent Environmental Audit 2011
Point 16	299003	6190105	O'Briens Gap West, Harry Graham Drive, Kembla Heights	February 2009	Refer to PAE Holmes Report: dated 28/1/09
Point 19	300418	6189563	West End of KVCLF	February 2009	Refer to PAE Holmes Report: dated 28/1/09

## 7 REPORTING

### 7.1 Monitoring Data and Non-Conformances

All non-conformances to this AQMP and community complaints are recorded in a computer based incident recording and reporting system. This system keeps track of non-compliances, corrective actions, responsibilities, planned and actual completion dates and details of reporting to Regulatory Agencies and the community where appropriate.

### 7.2 Internal and External Reporting

Reporting of air quality monitoring results and non-compliances occurs in a range of formats including:

- Internal Reporting;
- Reports to Regulatory Agencies (e.g. Licence Annual Returns, Annual Review, Development Consent compliance reporting);
- Report to the General Public (e.g. 14 day EPL monitoring report published on South32 web site); and
- Community Reports (e.g. South32/Illawarra Coal Sustainability Reports, and presentations to the Dendrobium Community Consultative Committee (DCCC)).

The number and category (noise, traffic, dust, etc) of complaints are reported during DCCC meetings on a bi-monthly basis. A summary of complaints for the year is reported in the Annual Review.

The Environmental Management Strategy contains further details of these reporting mechanisms.

### 7.3 Landowner Notification of Non-Conformance

If Dendrobium receives notification from a landowner who considers the operations to be exceeding the air quality criteria detailed in Schedule 4 of the Development Consent, the applicable conditions outlined in Schedule 7 of the Consent will be followed.

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## 8 RELATED DOCUMENTS

Coal Services Health (2006). "Report into PM10 dust monitoring at Kemira Valley" Prepared by Coal Services Health (Peter Adlington), Corrimal, NSW.

Holmes Air Sciences (2000), Air Quality Impact Assessment: Dendrobium Underground Mine Extension – Southern Coalfields NSW. Prepared for BHP Billiton by Holmes Air Sciences, Suite 2B, 14 Glen Street, Eastwood, NSW 2122

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KADENZ (2008). "Independent Environmental Audit for The Dendrobium Mine" Prepared by KADENZ Pty Ltd - Environmental Consultancy 1 Fairweather Street, Bellevue Hill, NSW 2023

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EML (2005). "Dendrobium Mine – Emission Testing Report – April 2005" Prepared by EML Pty Ltd, 417-431 Canterbury Road, Surry Hills, Victoria 3127.

Heggies (2006). "Dendrobium Coal Mine Environmental Particulate Monitoring and Compliance Assessment" Prepared for the Department of Planning, 23 to 33 Bridge Street, Sydney, NSW 2000 by Heggies Australia Pty Limited, Level 2 Lincoln Street, Lane Cove NSW, 2066.

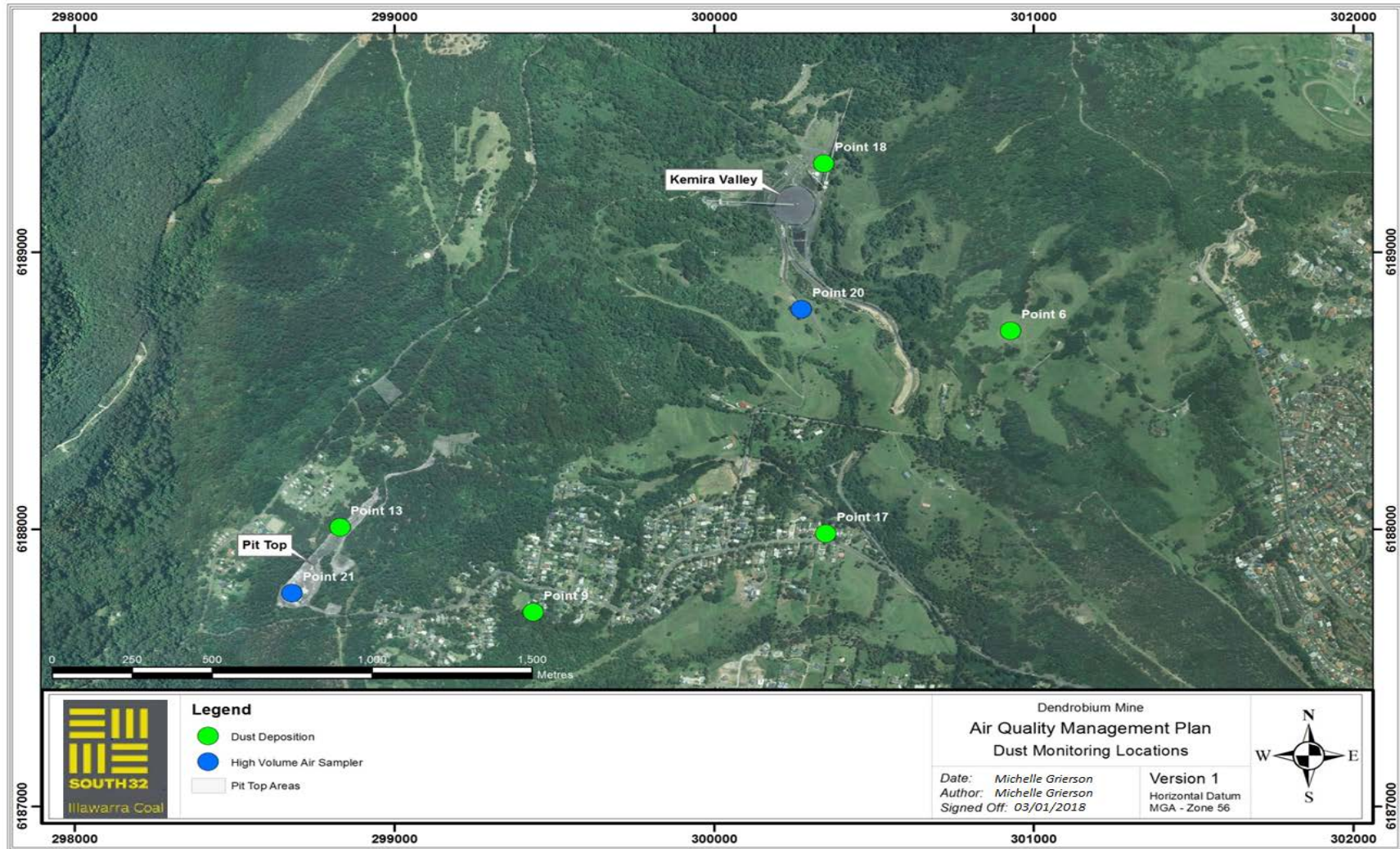
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Figure 1: Air Quality Monitoring Sites



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