

Construction Air Quality Management Plan

Augusta Street – Warehouse and Distribution
Centre

Augusta Street – Warehouse and Distribution Centre

SSD – 36138263

Construction Air Quality Management Plan

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Report No	J1969250109.02	
Date	09/01/2025	
Revision	02	

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REVISIONS

Revision	Date	Description	Prepared by	Approved by
Rev01	13/05/2024	Draft issued to client for review	Z Ahmed	M Williams
Rev02	09/01/2025	Updated to address client comments and Development Consent	Z Ahmed	M Williams

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Construction Air Quality Management Plan

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Acronyms and Definitions

Acronym / Term	Meaning
CAQMP	Construction Air Quality Management Plan
CEMP	Construction Environmental Management Plan
CO	Carbon monoxide
CoC	Condition(s) of Consent
DP	Deposited Plan
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
NO ₂	Nitrogen dioxide
NO _x	Oxides of nitrogen
PM	Particulate Matter
POEO Act	NSW Protection of the Environment Operations Act 1997
pphm	Parts per hundred million
ppm	Parts per million
SO ₂	Sulphur dioxide
SSD	State significant development
The Development	Augusta Street – Warehouse and Distribution Centre

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1. INTRODUCTION

1.1. Background

This Construction Air Quality Management Plan (CAQMP) has been prepared by Aspect Environmental Pty Ltd on behalf of ESR Australia & NZ (ESR) to support the State significant development (SSD 36138263) for the proposed Augusta Street Warehouse and Distribution Centre (the Development) at Augusta Street, Huntingwood (the Site).

The CAQMP is a sub-plan of the Construction Environmental Management Plan (CEMP) and has been prepared with reference to:

- State significant development 36138263 Development Consent and the included conditions of consent (CoC) dated 17 December 2024
- Response to Submissions Report (Urbis, 26 March 2024)
- Environmental Impact Statement (Urbis, 12 September 2023)
- SSD 36138263 Planning Secretary's Environmental Assessment Requirements which were issued in November 2023.

This CAQMP assesses the potential construction air quality impacts associated with the Development.

1.2. Development Description

The Development seeks to construct a modern industrial warehouse and distribution precinct which would be located at Augusta Street, Huntingwood East within the Blacktown local government area. The Site comprises multiple parcels of land and is legally described in Section 1.2 of the Construction Environmental Management Plan (CEMP).

The Site is approximately 34km west of the Sydney CBD and approximately 3.3km south of the Blacktown commercial centre.

The Site comprises a total of 26.64ha of undeveloped industrial zoned land within the Western Sydney Employment Area. The Site is immediately adjacent to two main roads, the Great Western Highway and the M4, bordering the north and south of the Site, respectively.

The Development involves:

- Site earthworks, including cutting and filling, required to deliver large-scale warehouse buildings.
- Construction and fit-out of four buildings (comprising 15 warehouse tenancies) including:
 - Warehouse Building 1, single-level (maximum building height 16.80m)
 - Warehouse Building 2, single-level (maximum building height 16.80m)
 - Warehouse Building 3 and 4, single-level (maximum building height 16.80m)
 - Warehouse Building 5, multi-level (maximum building height 34.84m).
- A total of 134,565m² of gross floor area is to be provided in the above buildings, comprising:
 - Warehouse: 128,027m²

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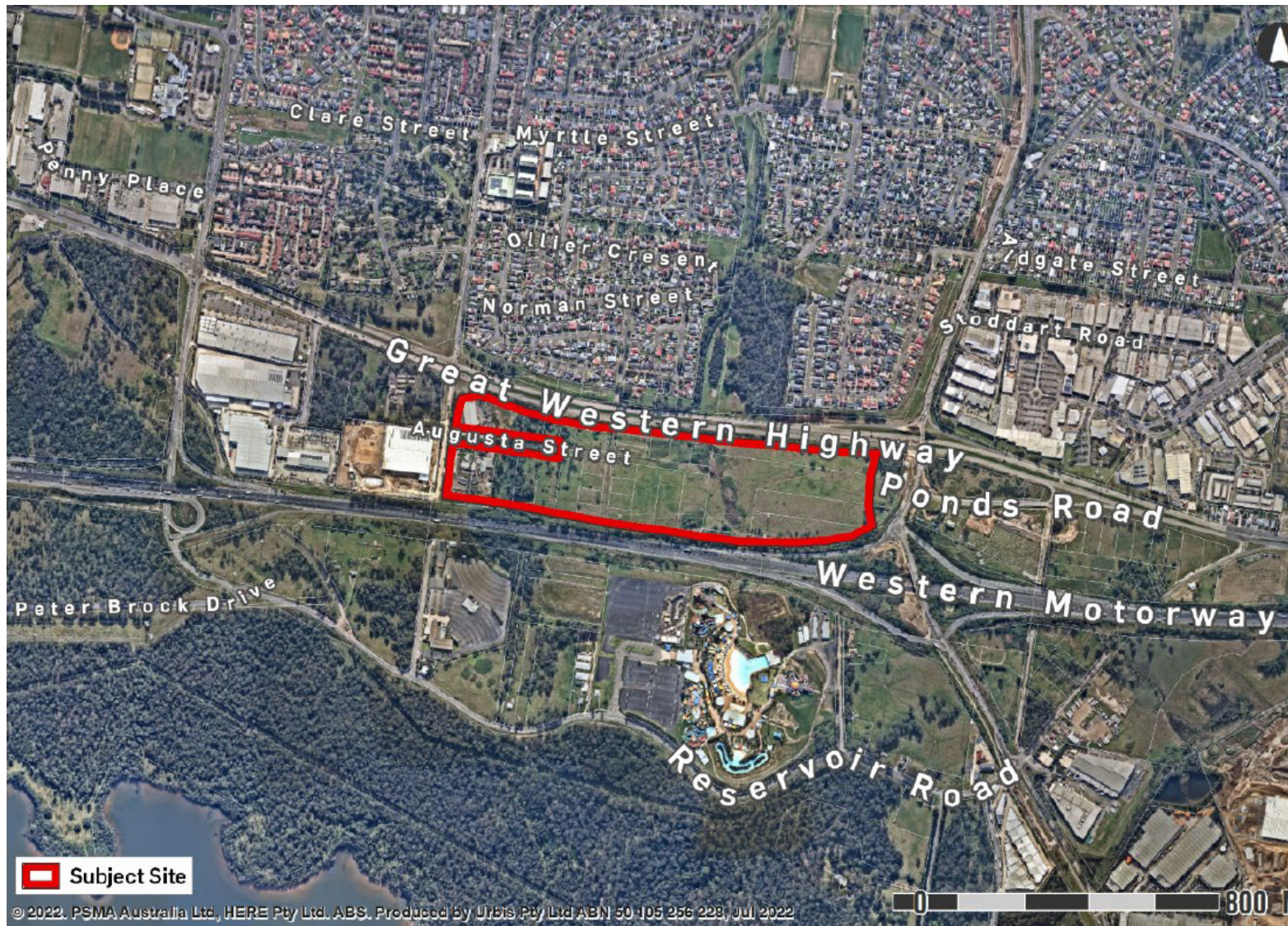
- Office: 6,538m².
- Vehicle access to Warehouses 1-4 is via Augusta Street and Flushcombe Road. A new intersection providing access from the Great Western Highway and Prospect Highway enables access to Warehouse 5.
- On site car parking provision of 951 spaces, including an overflow car parking area to satisfy Council's parking requirements, as well as forecast demand.
- Riparian planting and landscaping within the conservation areas and along the site boundaries.
- Business and building identification signage.
- Consolidation of the existing lots and subdivision into three Torrens title lots.

The Development site is indicated by red outline on Figure 1-1 and the site layout for the Development is shown in Figure 1-2.

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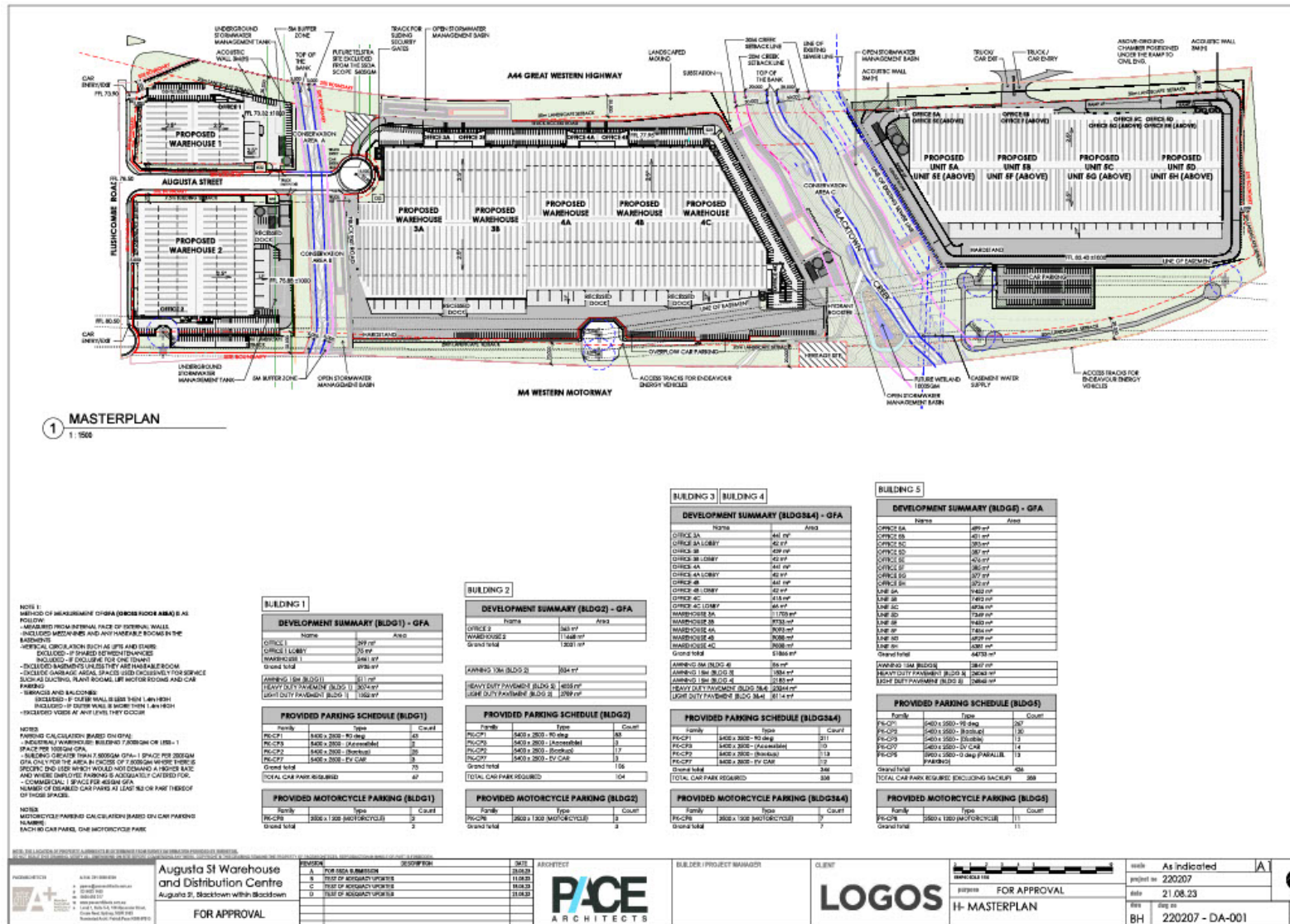
Figure 1-1 Site context (EIS, Urbis, February 2023)



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Figure 1-2 Site layout (EIS, Urbis, February 2023)



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1.3. Purpose of This Plan

This CAQMP has been prepared to address the conditions of the SSD 36138263 Development Consent related to air quality (CoC B43, B44 and B45), to provide methods to monitor and manage impacts to air quality during the construction of the Development.

Construction is to be undertaken in accordance with the most recent, approved version of this CAQMP.

All ESR personnel, contractors and visitors are responsible for the implementation of this CAQMP and have the responsibility to stop works if there is the potential for a safety or environmental incident to occur.

Roles and responsibilities for environmental management of the Development are outlined in Section 3.2 of the CEMP.

1.4. Objectives and Targets

The objectives and targets of this CAQMP are summarised in Table 1-1.

Table 1-1 Objectives and targets

Objectives	Target	Timeframe	Responsibility	Monitoring Method
Enable compliance with relevant legislation, CoC, requirements and guidelines	No written warnings or infringement notices	At all times	Contractor Environment Manager	Daily Site Inspection Checklist
	EPA air quality criteria		Contractor Project Manager	Daily logbook
Minimise impacts from dust emissions during construction for sensitive receivers	No complaints relating to air quality	At all times	Contractor Environment Manager	Complaints register

2. COMMUNITY AND STAKEHOLDER ENGAGEMENT

2.1. Consultation during Preparation of Plans

In accordance with SSD 36138263 Development Consent, consultation with stakeholders was not required during the development of this plan.

3. LEGAL AND OTHER REQUIREMENTS

3.1. Legislation and Guidelines

The Development is to be constructed in accordance with applicable legislative instruments, permits, licences and guidelines as required. The instruments relevant to the management of air quality across the Development are outlined in Table 3-1.

Table 3-1 Legislative and related instruments relevant to the Development

Instrument	Key Development Requirements	Activity/Aspect
<i>Environment Planning and Assessment Act 1979</i>	Establishes a system of environmental planning and assessment of proposed developments in NSW. The Development must comply with the requirements of the consent.	All
<i>Protection of the Environment Operations Act 1997 (POEO Act)</i>	Part 5.4 of the POEO Act requires operators to: (a) maintain plant in an efficient condition, or (b) operate plant in a proper and efficient manner. The Act also creates obligations for dealing with raw materials and emissions of particulates and odours which cause air pollution outside the premises.	Bulk earthworks. Materials management Stockpile management Operation and maintenance of plant and equipment
<i>Protection of the Environment Operations (Clean Air) Regulation 2022</i>	Part 5 deals with air impurities emitted from activities and plant including for non-scheduled premises.	Operation and maintenance of plant and equipment
National Environment Protection (Ambient Air Quality) Measure 2021	Establishes air quality criteria for chemical and particulate emissions.	Bulk earthworks Materials management Stockpile management Operation and maintenance of plant and equipment
Approved Methods for Modelling and Assessment of Air Pollutants in NSW (NSW Environmental Protection Authority (EPA), 2016)	Establishes air quality monitoring and assessment methods for chemical and particulate emissions.	Operation and maintenance of plant and equipment
Technical framework: Assessment and management of odour from stationary sources in NSW (EPA, 2006).	Odour emissions from plant or materials beyond site boundary.	Operation and maintenance of plant and equipment Site amenities Waste disposal areas

Where updated or revised versions of guidelines, protocols, standards or policies, or a replacement of them are available, the most recent versions are applicable to this Plan.

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3.2. Development Consent Conditions

The Development is to be constructed in accordance with SSD 36138263 Development Consent and in accordance with the documents referenced under CoC C3.

The conditions which apply to air quality and where they have been addressed are identified in Table 3-2.

Table 3-2 Relevant CoC and where the CAQMP addresses them

SSD 36138263 CoC		CAQMP Section
Operation of Plant and Equipment		
A29	All plant and equipment used on site, or to monitor the performance of the development, must be:	Section 5.3
	(a) maintained in a proper and efficient condition; and	Table 5-3
	(b) operated in a proper and efficient manner.	
Dust Minimisation		
B43	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Section 5.3
B44	During construction of the development, the Applicant must ensure that:	
	(a) exposed surfaces and stockpiles are suppressed by regular watering or other alternative dust suppression method;	
	(b) all trucks entering or leaving the site with loads have their loads covered;	
	(c) trucks associated with the development do not track dirt onto the public road network;	Table 5-3
	(d) public roads used by these trucks are kept clean; and	
	(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	
Air Quality Discharges		
B45	The Applicant must install and operate equipment in line 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 Protection of the Environment Operations (Clean Air) Regulation 2022	Section 5.3
Management Plan Requirements		
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:	Section 3.1
	(a) details of:	
	(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Section 3.1

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SSD 36138263 CoC	CAQMP Section
(ii) any relevant limits or performance measures and criteria; and	Section 5.2
(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Section 5.2 Section 6.4 Table 1-1
(b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Table 5-3
(c) a program to monitor and report on the:	
(i) impacts and environmental performance of the development; and	Section 6.2 Section 6.7
(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	Section 6.2 Section 6.7
(d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 6.4
(e) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 6.8
(f) a protocol for managing and reporting any:	
(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);	Section 6.6
(ii) complaint;	Section 6.6
(iii) failure to comply with statutory requirements; and	Section 6.5
(h) a protocol for periodic review of the plan.	Section 6.8
Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	Noted

4. EXISTING ENVIRONMENT

4.1. Meteorological Conditions

Meteorological conditions can have a large impact on local air quality. Local wind speed and direction influence the dispersion of air pollutants. In periods of high wind and dry weather there is a greater potential for dust and volatiles to be generated and transported offsite.

Wind data obtained from nearby Horsley Park Equestrian Centre air quality monitoring station show similar patterns of wind speed and wind direction over a four-year period, with south-westerly, north-easterly, and north-westerly winds prevailing (see Figure 4-1).

4.2. Local Ambient Air Quality

The closest weather station recording long term wind speed and wind direction data is the Horsley Park Equestrian Centre automatic weather station (Station ID 67119), located approximately 7 km south-west of the Site. The Horsley Park Equestrian Centre AWS is operated by the NSW Department of Planning Housing and Infrastructure.

A summary of air quality monitoring data over a seven-year period from 2018–2022 against the NSW EPA air quality criteria is provided in Table 4-1 for particulate matter (PM₁₀ and PM_{2.5}) and NO₂. A review of the Prospect air quality monitoring station data shows that exceedances of the 24-hour average PM₁₀ criterion were recorded in three years (2018–2020) and exceedances of the 24-hour average PM_{2.5} criterion were recorded in four years (2018–2021). A review of these exceedances indicates that they were associated with natural events such as bushfires, dust storms, or hazard reduction burns.

The results indicate local ambient air quality is generally below the relevant NSW EPA air quality criteria, noting that elevated levels were recorded during 2019 due to bushfires and dust storms in the region.

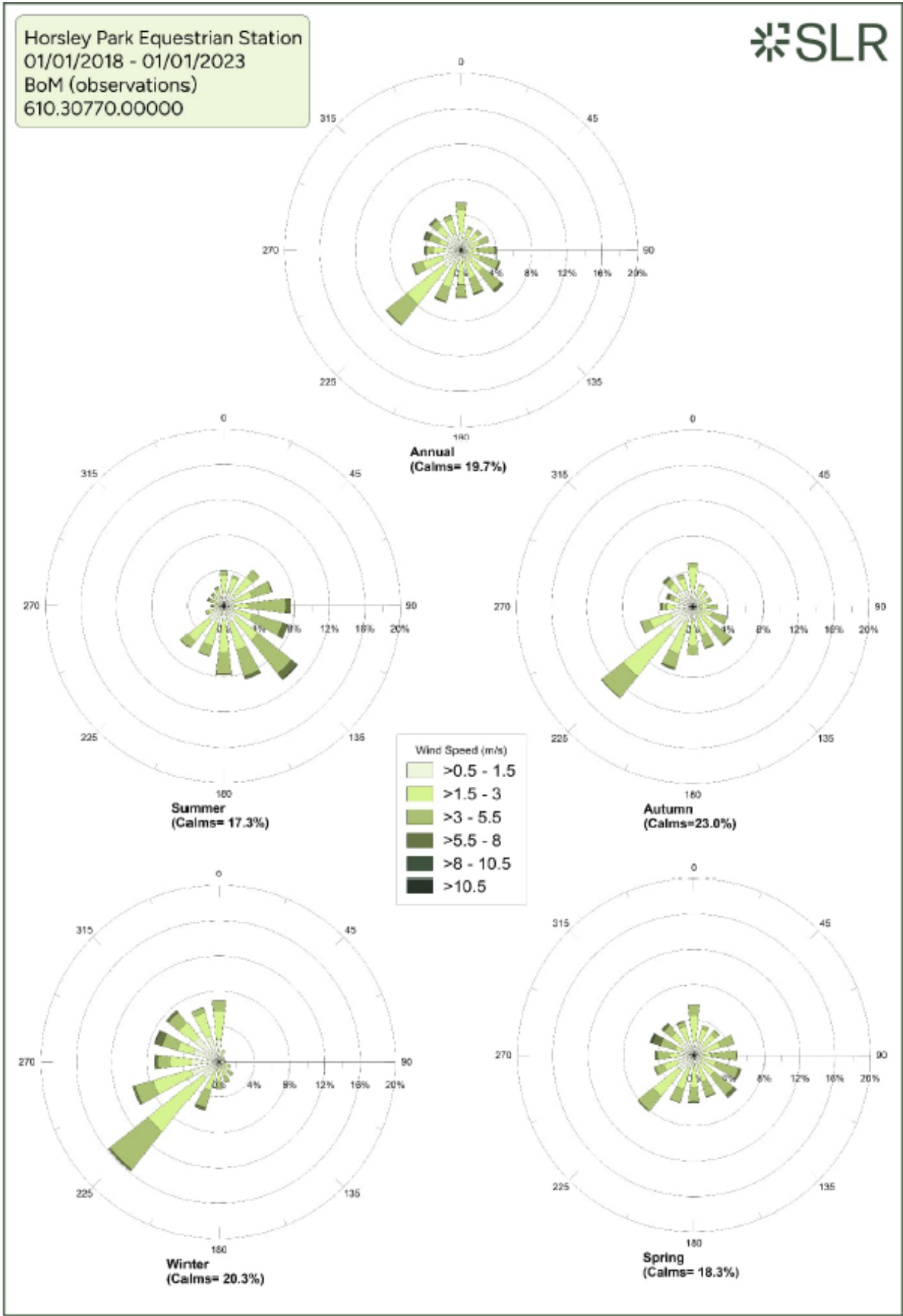
Table 4-1 Ambient air quality monitoring concentrations in proximity to the Development

Pollutant	Average Annual Concentration (µg/m³) 2018-2022	Average Annual NSW EPA Air Quality Criteria (µg/m³)
PM ₁₀	19.3	25
PM _{2.5}	7.8	8
NO ₂	15.9	31

Other sources of air emissions and odour in the surrounding area include traffic emissions from the surrounding road network including the M4 Western Motorway and M7 Westlink, and the Eastern Creek racetrack. There are several logistics and distribution centres in the vicinity of the Development which would also generate potentially significant local traffic movements.

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Figure 4-1 Horsley Park Equestrian Centre annual and season wind roses, 2018-2022 (SLR, 2023)



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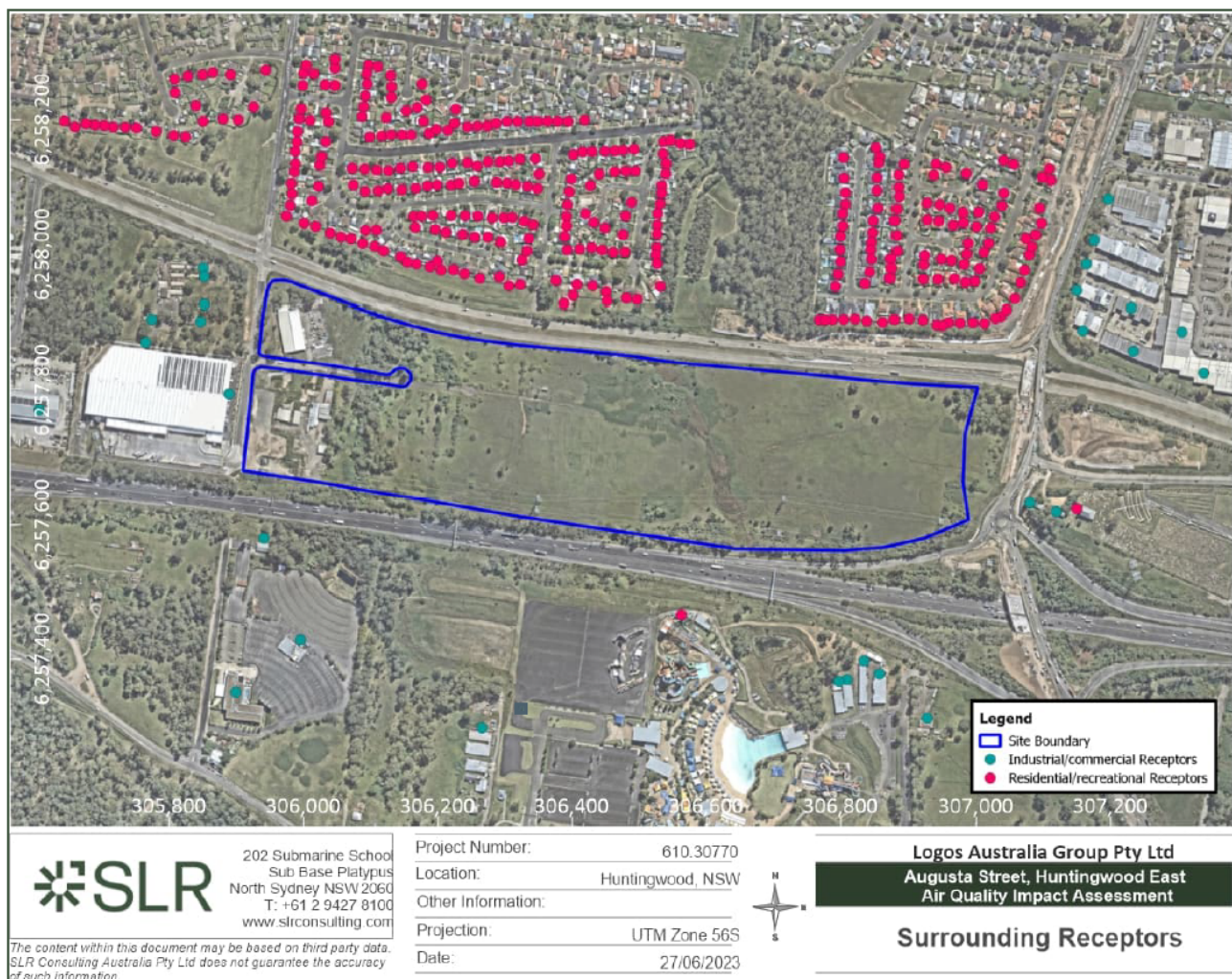
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4.3. Sensitive Receivers

The Development is located within an area utilised for industrial, warehouse and logistics purposes. The nearest residential area is located approximately 70m north of the site on the northern side of the Great Western Highway. There are industrial receptors on neighbouring lots to the east and west, and Raging Waters Sydney is located approximately 400m to the south. To the west, approximately 100m away, lies a national warehousing and logistics company (QLS Logistics). These sensitive receivers have been identified on Figure 4-2.

The Air Quality Impact Assessment (EIS, SLR 2023) undertook assessment of sensitivity of the identified individual receptors to assess the sensitivity of the area surrounding the active construction area, taking into account the proximity and number of those receptors, and the local background PM₁₀ concentration (in the case of potential health impacts) and other site-specific factors. The assessment concluded that the risk from construction activities to human health was low to negligible.

Figure 4-2 Sensitive receivers identified for the Development



5. IMPLEMENTATION

5.1. Air Emissions Sources

Section 6 of the Air Quality Assessment (SLR, 2023) identified likely sources of air emissions during construction of the Development:

- Earthworks:
 - Likely to be the longest stage of works and of most impact
 - Significant earthworks required that are to involve a large number of trucks, excavators, dozers, graders and associated equipment
 - Site requiring earthworks is expected to be approximately 232,216m². It is assumed that any contaminated material be identified and is to be appropriately treated/removed.
- Construction of warehouses:
 - Given the staging it is likely to be of a short duration with less impact than earthworks
 - Building works likely to involve a high number of truck movements, cranes and power tools
 - The total building footprint to be constructed is approximately 78,888m² with two storey buildings. Considering this the total building volume is estimated to exceed 100,000m³.
- Track-out:
 - It is estimated that more than 50 heavy vehicles movements per day are to occur during the peak construction period.

Section 6.1 of the Air Quality Assessment (SLR, 2023) concluded that the Development is considered unlikely to result in unacceptable air quality impacts, subject to the implementation of the identified management measures.

The main air quality issue associated with construction works relates to emissions of fugitive dust. The potential for dust to be emitted during the construction works is directly influenced by the nature of the activities being performed at any given time. Generally, the activities that are most likely to lead to short-term emissions of dust are:

- Grading
- Loading and unloading of materials
- Wheel-generated dust and combustion emissions from construction equipment
- Wheel-generated dust from trucks travelling on unpaved surfaces
- Wind erosion of exposed surfaces.

A number of environmental factors may affect the generation and dispersion of dust emissions, including:

- Wind direction – determines whether dust and suspended particles are transported in the direction of the sensitive receptors
- Wind speed – determines the potential suspension and drift resistance of particles

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- Surface type – more erodible surface material types have an increased soil or dust erosion potential
- Surface material moisture – increased surface material moisture reduces soil or dust erosion potential
- Other external factors such as current works being undertaken by others outside of the defined Development boundaries and current climatic (dry) weather conditions
- Rainfall or dew – rainfall or heavy dew that wets the surface of the soil reduces the risk of dust generation.

The potential sources of air emissions are identified and ranked in additional detail in Table 5-1.

Table 5-1 Potential sources of air emissions

Source	Description	Potential Emissions	Potential Impact
Earthworks	Active working of unsealed areas, including construction of internal roads, with excavators, bulldozers, scrapers, graders and other plant and equipment	Dust generation	High
		Vehicle, plant and equipment exhaust	Medium
	Vehicle and equipment movements across unsealed areas	Dust generation	High
		Vehicle, plant and equipment exhaust	Medium
	Screening, crushing or other processing of excavated material	Dust generation	Medium
		Plant and equipment exhaust	Low
	Loading and unloading of excavated material to and from trucks	Dust generation	High
		Vehicle, plant and equipment exhaust	Medium
	Exhaust from generators and other plant	Plant and equipment exhaust	Low
	Stockpiling of excavated and other material	Dust generation	High
		Odour generation	Low
Services/ utilities works	Site wide services and utilities installation using a variety of vehicles, plant and equipment	Dust generation	Low
		Vehicle, plant and equipment exhaust	Low
Roads and other sealed surfaces	Sediment deposited on roads and other sealed surfaces	Dust generation	Medium
Site compound	Light vehicle movements	Dust generation	Low
		Vehicle exhaust	Low
	Site ablutions facilities	Odours	Low

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5.2. Air Emissions and Air Quality Criteria

Based on the potential sources of air emissions identified in Table 5-1, the following pollutants require management during construction:

- Deposited dust particles – for management of nuisance dust
- Particulate matter – measured as total suspended particulates, PM₁₀ and PM_{2.5} – for management of potential health impacts
- Products of combustion of fuels in vehicles, plant and equipment – carbon monoxide (CO), oxides of nitrogen (NO_x) and in particular Nitrogen Dioxide (NO₂) and sulphur dioxide (SO₂) – for management of potential health impacts
- Odours generated during construction – for management of nuisance to community members outside of the site.

Air quality guidelines for these pollutants are specified in the approved methods for the Modelling and Assessment of Air Pollutants in New South Wales (NSW EPA, 2017) and the Technical framework: Assessment and management of odour from stationary sources in NSW (NSW EPA, 2006). Relevant air quality criteria from these documents are provided in Table 5-2.

Table 5-2 Construction air quality criteria

Pollutant	Averaging Period	Air Quality Criteria	Application
Deposited dust	Annual	4g/m ² /month total	Off-site receiver
Total suspended particulates	Annual	90µg/m ³	Receiver
PM ₁₀	Annual	25µg/m ³	Receiver
	24-hour	50µg/m ³	Receiver
PM _{2.5}	Annual	8µg/m ³	Receiver
	24-hour	25µg/m ³	Receiver
CO	8 hours	9ppm	Receiver
	1 hour	25ppm	Receiver
	15 minutes	87ppm	Receiver
NO ₂	Annual	3pphm	Receiver
	1-hour	12pphm	Receiver
SO ₂	Annual	2pphm	Receiver
	24 hours	8pphm	Receiver
	1 hour	20pphm	Receiver
	10 minutes	25pphm	Receiver
Odours	-	2OU	Site boundary

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Subsequent to the publication of the NSW EPA documents, the National Environment Protection Council varied the National Environment Protection (Ambient Air Quality) Measure standards for NO₂, PM_{2.5} and SO₂ in 2021.

The updated criteria for PM_{2.5} apply from 2025 and are:

- annual average of 7µg/m³
- 1-hour average of 20µg/m³.

The updated criteria for NO₂ are:

- annual average of 1.5pphm
- 1-hour average of 8pphm.

The updated criterion for SO₂ is:

- 1-hour average of 10pphm.

5.3. Management Measures

The air quality management measures to be implemented for the Development are identified in Table 5-3.

Table 5-3 identifies the emission sources (described in Table 5-1) that are addressed by each management measure, as well as the timing and responsibility for the implementation of each measure. The air quality criteria and details of air quality monitoring are included in Section 5.2 and Section 6.2 respectively.

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Table 5-3 Air quality management measures

ID	Management Measure	Timing	Responsibility
AQ 1	Record all air quality related complaints and any management measures taken. Make complaints log available to relevant authorities if requested (Council, EPA, DPE).	When required	Communications and Community Liaison Representative
AQ 2	Investigate all complaints and if required take appropriate action to manage emissions in a timely manner.	When required	Contractor Project Manager
AQ 3	Record any exceptional incidents (e.g. high winds, bushfire) that may cause dust and/or air emissions on or off site and note any actions taken.	When required	ESR Representative Contractor Environment Manager
AQ 4	Undertake daily site inspections on site and off site to monitor visible dust generation, dust suppression effectiveness and weather conditions and act if necessary.	During construction	Contractor Environment Manager
AQ 5	Where possible, locate high dust generating activities away from sensitive receivers and supervise these activities to allow prompt action to be taken should excessive dust generation occur.	During construction	Project Manager
AQ 6	Impose and signpost 25km/h maximum speed limits on surfaced and 15km/h on unsurfaced haul routes and work areas to minimise dust generated from vehicle movements.	During construction	All personnel
AQ 7	Utilise water cart(s) on site for dust suppression of haul roads, stockpiles and dust generating activities.	During construction	Contractor Project Manager
AQ 8	Install a shaker grid and wheel wash bay on site to minimise and manage tracking of sediment on public roads.	During construction	Contractor Project Manager
AQ 9	Remove materials that have a potential to produce dust as soon as possible, unless being used on site. If being reused, stabilise and cover materials.	When required	Contractor Project Manager

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ID	Management Measure	Timing	Responsibility
AQ 10	During periods of unsuitable weather (high winds and high temperatures), avoid or minimise dust generating activities where possible, or increase frequency of dust suppression activities.	When required	Contractor Project Manager
AQ 11	Avoid unnecessary idling and switch off engines during periods of inactivity.	During construction	Contractor Project Manager
AQ 12	Maintain vehicles, plant and monitoring and other equipment in accordance with manufacturers requirements and operate them in a proper and efficient manner. Replace, repair or service vehicles, plant and equipment observed to have excessively smoky exhausts.	When required	All personnel
AQ 13	Monitor weather conditions and stop works if dust generation is excessive.	Daily	Contractor Environment Manager
AQ 14	Use water-assisted dust sweeper(s) on the access and local roads, as necessary.	When required	Contractor Project Manager
AQ 15	Cover vehicles and trucks entering and exiting site to prevent escape of materials during transport.	During construction	Contractor Project Manager
AQ 16	Where possible, prioritise land stabilisation works to minimise exposed surfaces.	During construction	Contractor Project Manager
AQ 17	Where feasible, locate potential odour sources (e.g. sewage pumpouts, portalooos and stockpiles) away from sensitive receivers and monitor the works to avoid the emission of any offensive odour across the site boundary.	During construction	Contractor Project Manager
AQ 18	Record inspection results and make available to relevant authorities. This should include regular dust soiling checks of surfaces such as street furniture, cars and windows.	During construction	ESR Representative

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ID	Management Measure	Timing	Responsibility
AQ 19	Cover, seed or fence stockpiles to prevent wind erosion.	Where required	Contractor Project Manager
	Stockpiles to be stabilised in accordance with Blue Book requirements including:		
	- Stockpiles to be less than 2m in height		
	- Stockpiles to be away from sensitive receptors		
	- Stockpiles to be trimmed with slopes		
	- Stockpiles to be retained on site for more than 30 days are to be stabilised. Use soil binding agents on exposed surfaces – these can form a crust that prevents wind erosion and can be more effective than dewatering.		
AQ 20	Check the spill equipment is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable.	During construction	Contractor Project Manager
AQ 21	Inspect on site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.	Where required	Contractor Project Manager
AQ 22	Record all inspections of haul routes and any subsequent action.	During construction	Contractor Project Manager
AQ 23	Maintain an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.	During construction	Contractor Project Manager
AQ 24	Maintain paved surfaces on site to avoid accumulation of dust and mud and tracking of sediment.	During construction	Contractor Project Manager
AQ 25	Install and maintain access and egress points in accordance with Blue Book requirements, with hardstand installed to prevent wheel rutting and degradation of the access points.	During construction	Contractor Project Manager

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5.4. Training and Awareness

As detailed in Section 3.6 of the CEMP, all Development personnel to be made aware of the site-specific air quality management requirements through a site induction and prestart meetings/toolbox talks prior to the commencement of construction.

All Development personnel to benefit from specific air quality management training to help them better manage the environmental impacts of the Development, where they are made aware of:

- the air quality objectives of this CAQMP
- air quality related legislation requirements
- roles and responsibilities outlined in this CAQMP
- relevant control measures
- incident management and response
- communication and notification requirements.

6. MONITORING AND REVIEW

Ongoing environmental inspections, monitoring and reporting for the Development is detailed in Section 5 of the CEMP. The monitoring and review actions relevant to this CAQMP are provided below.

6.1. Environmental Inspections

Environmental inspections to be undertaken are described in Section 5.1 of the CEMP. Environmental inspections relevant to this CAQMP are detailed in Table 6-1.

Table 6-1 Environmental inspections

Report	Timing/Frequency	Responsibility
Implementation of management measures	Daily and weekly inspection	Contractor Environment Manager
Report on excessive dust being generated at source and dust leaving the site	As required, based on daily visual inspection	Contractor Environment Manager
Pre-start checks on plant and equipment and reports to Environmental Manager	Daily	Plant and Equipment Operators

6.2. Environmental Monitoring

Environmental monitoring is summarised in Section 5.2 of the CEMP and is to be undertaken to assist in the management of the following:

- construction of the Development in accordance with environmental approvals
- compliance with all relevant legislative requirements
- the minimisation of potential environmental incidents
- effectiveness of environmental controls
- implementation of this CAQMP.

ESR will perform their functions in accordance with the SSD 36138263 Development Consent.

6.3. Environmental Auditing and Records

Environmental auditing is described in Section 5.3 of the CEMP. Audits would involve a review of all environmental documents, records and reports to verify compliance with the CEMP and this CAQMP.

Environmental and procedural aspects to be covered by the audit may include:

- implementation and effectiveness of management measures detailed in this CAQMP
- adherence to reporting procedures
- complaint and incident management
- compliance with legislative requirements.

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The environmental records that need to be maintained are:

- complaints
- incident, non-conformance and corrective action reporting
- communications with stakeholders
- environmental monitoring
- waste classification and disposal management
- CEMP audit documentation.

Records of auditing and reporting are to be maintained on site.

6.4. Contingency Management Plan

If inspections, monitoring and/or auditing indicate that the construction air quality management measures listed in this CAQMP are not effective in managing environmental impacts from the Development, the air quality management measures detailed in the Contingency Management Plan are to be implemented. The implementation of this Plan will allow the Development team to reduce ongoing impacts to levels below relevant impact assessment criteria as quickly as possible.

The consolidated Contingency Management Plan is included as Appendix K of the CEMP.

6.5. Non-Compliance and Actions

A non-compliance is defined in SSD 36138263 Development Consent as an:

occurrence, set of circumstances or development that is in breach of this consent.

Potential non-compliances with the CoC and this plan will be managed in accordance with Section 5.5 of the CEMP. This includes the reporting, investigation and notification of non-compliances.

6.6. Environmental Incident and Emergency Response

An environmental incident is defined in SSD 36138263 Development Consent as an:

occurrence or set of circumstances that causes or threatens to cause material harm, and which may or may not be or cause a non-compliance.

Environmental incidents can be identified by anyone and are to be reported to the ESR Representative immediately.

Potential or actual environmental incidents will be management in accordance with Section 5.6.1 of the CEMP.

Section 5.6.2 of the CEMP details the response to environmental emergencies for the Development. Emergency contact details are also provided.

In the event of an environmental incident or emergency related to the implementation of this CAQMP, the responses detailed in the CEMP are to be implemented.

6.7. Environmental Reporting

The reporting of environmental performance during construction is to be undertaken as required by the Development Consent. Environmental reporting requirements for the

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Development are documented in Section 5.7 of the CEMP and reports relevant to this CAQMP are listed in Table 6-2.

Table 6-2 Summary of CAQMP environmental reporting requirements

Report	Timing/ Frequency	Responsibility	CoC
Environmental inspection and progress reports	Ongoing to the Project Manager	Contractor Environment Manager	NA
Report on excessive dust being generated at source and dust leaving the site	When occurs, based on daily visual inspection	Contractor Environment Manager	NA
Pre-start checks on plant and equipment and reports to Environmental Manager	Daily	Plant and Equipment Operators	NA
Non-Compliance Report	As required, following identification of a noncompliance	Contractor Project Manager	CoC C12
Incident Report	Within 30 days of the date on which the incident occurred	Contractor Project Manager	CoC C11

6.8. CAQMP Review and Revision Program

This CAQMP is to be reviewed in accordance with Section 5.8 of the CEMP. The Development will bi-annually review the adequacy of the environmental management measures within the CEMP and sub-plans (including this CAQMP) as well as the effectiveness of their implementation to determine whether they are still applicable to the activities being carried out on site. This review is to be undertaken by the Contract Environment Manager in consultation with the Contract Project Manager and ESR Representative.

CoC C8 also states that all strategies, plans and programs required under the SSD 36138263 Development Consent would be reviewed and the Planning Secretary notified of the review within three months of:

- the submission of an incident report under CoC C11;
- the approval of any modification of the conditions of this consent; or
- the issue of a direction of the Planning Secretary under CoC A2(b) which requires a review.

As per CoC C9, where documents are revised under the above reviews, the revised documents would be sent to the Planning Secretary for approval within six weeks of the review.

All employees and contractors are to be informed of any revisions to the CAQMP during toolbox talks.