

Environmental Program

AIR QUALITY MANAGEMENT

BBA-ENP-1000-1400-0008

Revision	Date	Revision Description	Prepared	Reviewed	Approved
A0	27 April 2007	Draft for BBA review	IW		
A1	9 May 2007	Draft for DTAE review	IW		
B0	31 Oct 2007	Revised after audit and issued for DTAE approval	IW	JD	JC
B2	22 Jan 2008	Revised following DTAE comments	JRD	JD	CF

Table of Contents

1.	PURPOSE AND SCOPE	2
2.	OBJECTIVES	2
3.	TARGETS	2
4.	REGULATORY AND CONTRACTUAL REQUIREMENTS	2
5.	TECHNICAL DOCUMENTS	2
6.	KEY ISSUES	3
7.	OPERATIONAL CONTROLS	3
8.	SITE ENVIRONMENTAL PLANS	4
9.	CONTINGENCY MANAGEMENT	4
10.	EVALUATING PERFORMANCE	4
11.	REPORTING	5
12.	ATTACHMENTS	5

Operational Control Tables

Table OCO 8.1 Air Quality Management

1. Purpose and Scope

This Environmental Program describes Air Quality Management measures to minimise the impact of the design and construction of the Bell Bay pulp mill.

This Environmental Program forms part of the Bell Bay Alliance (BBA) Construction Environmental Management Plan (CEMP) and must be read in conjunction with the CEMP.

2. Objectives

1. Protect the beneficial uses of the air environment consistent with the requirements of Tasmania's Environment Protection (Air Quality) Policy 2004 during the construction stage.
2. Prevent, as far as practicable, raised dust, which would cause nuisance to local residents, workers and the natural environment.
3. Ensure there is no health risk or loss of amenity due to the emission of dust to the environment.

3. Targets

1. Construction activities to be managed in accordance with EPA Victoria publication 480 (Environmental Guidelines for Major Construction Sites) so as to maintain air quality to a standard which does not prejudice the health and amenity of nearby residents.
2. Total Dust to be no greater than 50% above background ($g/m^2/month$).
3. Visible smoke from construction plant shall not persist for longer than 15 seconds (for off road plant) and 10 seconds (for plant registered for use on public roads).
4. Minimise community dust-related complaints during construction.

4. Regulatory and Contractual Requirements

Refer to:

- CEMP Appendix B – Environmental Legislation Register
- CEMP Appendix C – Approvals Matrix
- CEMP Appendix D - Environmental Licences Register
- CEMP Appendix F – Environmental Commitments
- CEMP Environmental Obligations Register: GNS-OBL-1000-1400-001.

5. Technical Documents

The following background studies, research documents and assessments have been used to identify the key environmental aspects:

Reference	Document Title
http://www.gunnspulpmill.com.au/iis/	Bell Bay Pulp Mill Draft IIS and Appendices

The following technical documents have been used to assist in identifying appropriate operational controls:

Availability	Document Title
DTAE	Environment Protection Policy (Air Quality) 2004
Envirolaw Website	Victorian State Environment Protection Policy (Air Quality Management) (SEPP (AQM)), December 2001.
EPA Victoria	EPA Publication 480 – Environmental Guidelines for Major Construction Sites, February 1996.
EPA Victoria	Instructions for Completing Works Approval, Licence & Licence Amendment Applications, EPA Publication 375.2, July 2004.

6. Key Issues

Refer to:

- CEMP Appendix G – Environmental Risk Assessment.

The civil earthworks associated with this project has the potential, if not properly managed, to generate significant fugitive dust emissions.

The technical documents and the environmental risk assessment have identified the following key issues:

- Dust from exposed soil surfaces and haul roads during construction can cause a nuisance in surrounding areas.
- Dust from exposed soil surfaces and haul roads during construction can settle onto vegetation during dry periods, reducing photosynthesis.
- Excessive smoke from exhausts causes pollution of the atmosphere.

In all instances, dust generation will be minimised as the first option, in preference to dust suppression measures.

7. Operational Controls

Environmental outcomes to be achieved include:

- Dust Management Plan
- No nuisance dust impacting on residential or commercial areas
- No widespread build-up of dust on vegetation foliage
- No nuisance dust impacting on workers.

The operational controls for management of air quality during design and construction are set out below:

Table Reference	Title
OCO 8.1	Air Quality Management

The operational controls include requirements and responsibilities for:

- Consultation.
- Approval requirements.
- Design of permanent works.
- Design of temporary works.
- Construction activities.
- Commissioning and handover.

8. Site Environmental Plans

- Refer to SEP Register.

Site Environmental Plans (SEPs) detail practical environmental management measures to be implemented at specific worksites to minimise potential impacts of construction activity on the environment and community. They are designed to provide more site specific detail than is included in the Environmental Program and Operational Control tables.

The information contained in the SEPs is presented in tabular drawing format. This is to make them easy for use by all BBA site personnel, consultants and subcontractors.

The controls set out in the SEPs are drawn from the Environmental Programs.

9. Contingency Management

The environmental risk assessment has identified the following circumstances that could occur outside normal operating conditions:

- Extreme dry and/or windy conditions during a weekend or overnight break in construction causing excessive dust emanating from the site.

If these circumstances occur, the following contingency measures will be implemented:

- Supervisors will arrange water trucks to moisten haul roads, earthworks areas and spoil heaps to reduce dust emissions.

10. Evaluating Performance

The Operational Controls, together with the SEPs are used as the basis for evaluating performance.

Refer to:

- CEMP Appendix H – Construction Monitoring Plan.
- CEMP Appendix I – Internal Environmental Audit Schedule.
- CEMP Appendix J – External Environmental Audit Schedule.

Environmental Checklists are used for evaluating performance.

Refer to:

- BBA-CKL-1000-1400-008A Air Quality Management.

11. Reporting

Refer to:

CEMP Appendix K – Environmental Reporting Program.

12. Attachments

Not Used.