

Review Group	Management Plan/PEPR Section	Section or Area of Focus	Rex Feedback ID (Internal)	Reviewer Feedback	Rex Classification	Feedback Duplication /Similarity	Rex Response
		2. Air Quality Conditions	AQ073	What happens if local residents consider there is a public health or public nuisance impact from dust, even though limits are being maintained? How can these community-perceived impacts be measured? Community Recommendations: Performance indicators or measurement criteria to be developed by Rex in close consultation with the community, to identify and monitor what constitutes public health and public nuisance impacts from the community's perspective. These to be developed before any construction commences at Hillside. Public Health and public nuisance indicators especially required in view of S. 2 Condition 5	Dust Impacts on Community	AQ038	Public health factors are incorporated into the NEPM standards and Environment Protection (Air Quality) Policy 2016, which were used by the DPC in setting the Hillside compliance levels. These standards assume dust exposure over a period of time also. We will operate to these compliance levels. Public nuisance dust will be the subject of ongoing engagement with the community, preferably through an ongoing air quality working group.
		Schedule 2 and 6	AQ074	Do air quality schedule 2 and schedule 6 conditions apply to construction and operation?	Schedules 2 or 6		Yes they apply to both
		General Comments	AQ075	There is no condition re cumulative effect of PM2.5, PM10 and TSP on human health – (ie how much total PM10, PM2.5 dust is an individual exposed to over a 24 hour period or over a 12 month period? for example) This seems to reinforce the need for community-based indicators for public health impacts.	Dust Impacts on Community	AQ073	The impacts to health of cumulative dust levels have been incorporated into the NEPM and Environment Protection standards, and hence into our ML conditions. In particular Rex needs to ensure it maintains and monitors dust levels within the site for employee health, and this will help to ensure ensure public health is not impacted.
		Schedule 6	AQ076	Schedule 6, condition 2; no loss or abundance or diversity of native vegetation through dust contamination, deposition during construction, operation and post mine completion. QUESTION: Is this dealt with in the Native Vegetation Management Plan? (esp wrt native orchids)? If not, How will this be monitored? When will that monitoring commence? What will be the monitoring frequency? What are the Rex strategies for rectifying problems if identified?	Dust Impacts on Native Veg		Yes will be managed through the Native Vegetation Mgt Plan - refer to this for monitoring of native veg.
			AQ077	Schedule 6, condition 3: no impacts on agricultural productivity during construction, operation and post mine completion. • Performance indicators • Measurement techniques, • What types of monitoring • Commencement of monitoring – start of construction? • Monitoring frequency • Rex strategies if problems identified • What compensation/remedial action taken to fix the damage caused <i>Draft MP – page 21: to assist in reviewing cumulative dust impacts around the Hillside mine, consultation and data sharing arrangements will be explored with neighbouring services". This is too vague. No specific details about who, what, when, how measured.</i> <i>DPC comment re this condition: "Details of monitoring program and Rex's response to identified contamination must be included in the PEPR – following adequate stakeholder engagement" (*DSD response to questions re ML conditions – dated 3/7/15)</i>	Dust Impacts on Agriculture	AQ003	Additional Dust Deposition Gauges may be placed on agricultural land in consultation with landowners on or adjacent to the Land to monitor TDD and/or to evaluate if changes to crop yield are detected/reported. Independent Agronomists may be engaged to undertake these studies.
		Schedule 2	AQ078	NEPM dust concentration limits set for PM2.5 (p 6) – according to Andrew Q = - 25ug/m3. We understand NEPM standards for PM2.5 currently being assessed. If limits set at below 25 ug/m3, will this be applied to Hillside?	PM2.5/PM10	AQ001 & AQ002	Hillside site has current ML conditions set - any future change eg through an updated PEPR process, will be up to the DPC.
			AQ079	How valid is it to cut off PM2.5 measurements after one year of operation when the operation will be very small, there will be no blasting and little haul truck movement and PM2.5 poses greater risk to human health than PM10. Community Recommendation: PM2.5 monitoring should be maintained until at least end of Year 5 and probably year 9, esp. given the following: • Page 12 (draft MP): "Key risks identified in modelling is potential for exceedance of PM2.5 criteria in Year 9 to Receptor 25". Dust is, according to draft MP, going to be most pronounced in Yrs 5 and 9	PM2.5/PM10	AQ001 & AQ002	Rex will develop over a one year period (may not be just first year -have removed reference to this) an empirical relationship with PM10 and PM2.5 to the satisfaction of the DPC. The relationship between PM10 and PM2.5 is constant for the rock types and style of operations over time (hence the one year requirement). This will allow accurate calculation of PM2.5 levels from PM10 results. Also by years 5 and 9 the on-site learnings from dust management should ensure that exceedance risk is lower in those years.
			AQ080	Condition 5: This allows Rex to exceed TSP limits if it satisfies Director of Mines that in so doing, there will be no increase in public nuisance. <i>DSD comment: "DSD expects Rex to engage with the community in relation to any proposed change in existing compliance limits, prior to Rex making a submission". (*DSD response to questions re ML conditions – dated 3/7/15).</i> This is not stipulated in draft MP. Community Recommendation: Community must be informed and consulted beforehand of Rex's intention to seek increase in limits. This needs to be stated in MP. Clear set of criteria or indicators needed to measure whether any increase in TSP limits will lead to increase in public nuisance (also see discussion Point 1 above). These indicators must be developed by the community in consultation with Rex.	TSP		Rex is happy to consult with community through suitable group (eg ongoing air quality group) prior to proposing any change in compliance. Any final decision is by DPC.
			AQ081	Page 13: "to the extent possible, plan activities in areas close to mine boundary..... Use of phrase "to the extent possible" suggests it may not always be viable. Question: how flexible are mining operations (eg redirection of haul trucks) to allow this to occur, esp. as unfavourable conditions may persist for many days (eg south easterlies during summer?)	Dust Mitigation		Refer to TARP and mitigation measures tables - Rex can vary or halt operations for all unfavourable weather conditions, and in general will be able to change dumping sites to suit wind directions - Rex needs to always comply with Lease conditions.

7.3 Mitigation Measures	AQ082	Page 17: <i>"Where relocation not possible, temporarily halt activities"</i> . Again, if conditions persist for days, how viable is this option?	Dust Mitigation	AQ081	Refer to TARP and mitigation measures tables - Rex can vary or halt operations for all unfavourable weather conditions, and in general will be able to change dumping sites to suit wind directions. Also prevailing wind directions in certain seasons can be taken into account for future planning.
	AQ083	Haul trucks – no indication of how to control dust from haul truck loads	Dust Mitigation	AQ081	Water trucks dampen loading areas within pit where truck and excavator loading. Usually fine particles move down through truckload as the trucks move around / drive out of the loading area and pit. Visual monitoring of dust sources by mine supervisors is an important part of daily operations, and additional watering of loading points can be undertaken as needed.
	AQ084	Water trucks: Page 15: three water trucks – what size and capacity? Compare with Klien's Point (1 - 70,000 litres) and Arium (1 - 15,000 litres)	Dust Mitigation	AQ081	2 x 181,000L trucks & 1 X 23,000L truck. This is deemed adequate for an operation this size, and in particular with this fleet size. The smaller truck will be able to water around the process plant roads as needed, and also can be taken offsite for assistance with firefighting etc.
	AQ085	Blasting; Page 16: <i>"based on assessment of weather conditions ..to ensure no excess dust or fume emissions"</i> . How flexible can this be? Halt operations if unfavourable weather conditions persist for entire day? Page 16: <i>Wherever practicable, blasts will be fired in suitable weather conditions....</i> What if this is not practicable – will blasts still go ahead?	Dust Mitigation	AQ081	Refer to TARP and mitigation measures tables - Rex can vary or halt operations for all unfavourable weather conditions, and in general will be able to change dumping sites to suit wind directions. Blasts can be halted and safely held over until the following day - Rex needs to always comply with Lease conditions.
4 Baseline measurements and modelling	AQ086	PM2.5 - averaging period 1 yr - based on 2008 Netley monitoring data (where is Netley?)	PM2.5/PM10		EPA data used from Netley, Adelaide, which will be very conservative compared to likely higher background PM2.5 on YP. Was only SA PM2.5 data available at the time. Hillside will be measured on total leaving site anyway, including existing ambient and mine addition.
4 Baseline measurements and modelling	AQ087	Management Plan - P 11 proposal to <i>"collect sufficient on-site PM10 data to establish a more representative air quality baseline - during early operations"</i> . Seems inadequate because: the data will only be collected within the mine site, not at each sensitive receptors; no PM2.5 data will be recorded and data will be recorded after operations commence, not before. Community Recommendation: Need for baseline data collection at sensitive receptors at least 6 months prior to construction	PM2.5/PM10		Background / baseline dust levels do not vary on average over relatively short distances, and hence DPC and EPA are fine with our monitoring station location. Rex is measured on total dust leaving site, and hence no matter what the background levels Rex has to maintain compliance for dust leaving site - including both existing ambient and mine addition.
Unknown	AQ088	Rex will base averages on hourly readings. Why not 10 minute readings?	Measurement Criteria		Compliance levels are based on 24 hour average - midnight to midnight. Rex will use 10 minute real time for ongoing dust management to keep within compliance.
Page 23	AQ089	Will an independent agent (other than a Rex consultant/employee) oversee and regularly check the accuracy of Rex's calibrations?	Calibration - Dust		Rex has to ensure that monitors are calibrated by a trained professional or instrument technician.- this is normally an external consultant
	AQ090	Does DSD have a monitoring role to ensure calibrations are accurate?	Calibration - Dust		Rex has to ensure that monitors are calibrated and a calibration certificate is issued by the technician. These are included in DPC and annual reporting
Page 27	AQ091	Implication that all extremely high values (limits not specified) are "Suspect", Why?	Data Validity		All data is externally validated by the independent monitoring party before being used - standard practice for dust and other monitoring, including within DPC and EPA.
	AQ092	If negative values are left in, and extremely high values are excluded, won't the averages be skewed to favour of underestimating dust emissions?	Data Validity		The Australian Standards specifies how to handle negative data, and this is followed. All data is externally validated by the independent monitoring party before being used - standard practice for dust and other monitoring, including within DPC and EPA.
	AQ093	Will the determination of which values to include/exclude be left to Rex's discretion?	Data Validity		The independent monitoring group, or in case of dust analysis, the laboratory undertaking the analysis, and our consultant will be involved - all anomalous data will be explained in reports
	AQ094	Will a log be kept of each negative or high positive readings removed by Rex?	Data Validity		Yes - see above
	AQ095	Will this adjustment process be subject to independent audit by DPC?	Data Validity		Results are reported to DPC
	AQ096	Where are the safeguards for the community against Rex manipulating the data in their favour?	Data Validity		Refer above
	AQ097	No readings during power failure. Is that limited to regional blackouts only or does it also apply to internal power failures?	Data Validity		Any type of power failure that impacts the site.
	AQ098	How many outages (if any) are Rex allowed due to their own maintenance regime, rather than regional blackouts?	Data Validity		Rex's production is continuous 24/7, with thickeners tanks needing to be kept moving such that material doesn't settle. We do not plan to have power outages, only ensure we have a contingency plan if there is one.
	AQ099	<i>"At least 75% of hourly data required for valid daily averages"</i> : does that mean that, even if 100% values are present, Rex can select only 75% of these for their calculations?	Data Validity		No, all readings will be used, with at least 75% required for a valid reading.
Table 8 Monitoring Locations	AQ100	Why no real time monitors o due north between RP and Receptor 13, o due NW between Receptor 13 and Receptor 25 o at Black Point o along eastern edge of WRD along Gulf.	Dust Monitoring Locations		The real time monitors are placed around the site to ensure timely dust monitoring feedback for management purposes, and located at closest receptors. Actual dust monitoring experience at mine sites (and other industrial sites) shows that dust concentrations reduce with distance from the site, and therefore areas further away than the closest receptors will have less dust. This is replicated in the modelling also. These five real time locations are not the only monitors, with additional high volume samplers within the site (for management) and dust deposition gauges at other receptor location (residential) and individual landholder sites where agreed (not shown). Rex has also agreed to locate an additional TDD gauge near the closest Black Point residences, and an additional TDD gauge on the ML eastern boundary. Hence there could be between 14 and 18 dust monitoring sites in operation at any one time in and around the mine.
	AQ101	Page 23: <i>"five BAM are installed to measure PM 2.5, PM10 and TSP concentrations in north, south, west of mine site"</i> . Yet table 8 does not indicate all three of these components will be measured at each site. Instead, states: · Near Rogues Point - PM10 Receptor 13: PM10, PM2.5 (year 1 of operations) Receptor 25: PM10 Receptor 34: PM10 Pine Point: PM10 Table 8 therefore suggests only one site where PM2.5 will be measured and that is for first year of operation only.	Dust Monitoring Locations		The current realtime dust monitoring proposed includes five locations with PM10, and one of these (M2 - in the prevailing SE to NW wind direction) having a realtime PM2.5 monitor. The rationale in this is that the PM10 is accurately measured at each location, and the PM2.5 measured at the M2 location provides a real measurement of the ratio between PM10 and PM2.5 on an ongoing basis. This measured ratio can then be used to calculate the PM2.5 at the other locations. Rex will develop over a one year period (may not be just first year - have removed reference to this) an empirical relationship with PM10 and PM2.5 to the satisfaction of the DPC. The relationship between PM10 and PM2.5 is constant for the rock types and style of operations over time (hence the one year requirement). This will allow accurate calculation of PM2.5 levels from PM10 results.

Community Air Quality Management Plan	AQ102	Is there only one PM2.5 monitoring station? Will this monitoring cease after one year of operation? (as indicated by reference to PM2.5 at Receptor 13). If so, is Rex pre-empting a decision by Director of Mines for Rex to use PM10 as a substitute measurement for PM2.5?	PM2.5/PM10	AQ079	Rex will maintain the PM2.5 site until the Director of Mines approves the use of PM10 as an accurate measure of determining PM2.5.
	AQ103	What contingencies are in place if PM10 not acceptable indicator of PM2.5? Measuring for first year of operation is unacceptable (see earlier discussion). Even during that first year, to prove the company is complying with the PM2.5 limits, surely it is essential that this monitoring be undertaken at all BAM locations not just one. Why locate the only PM2.5 monitor at a single farmhouse to the NW of the mine when other locations (eg Rogues Point and Pine Point) have multiple permanent residences?	PM2.5/PM10	AQ079	Side by side monitoring of PM10 and PM2.5 is best obtained in the dominant wind directions, which are SE / NW - hence the location of PM2.5 monitors proposed. The PM2.5 will continue as needed to prove this relationship to the satisfaction of the DPC. Have removed reference to first year only.
	AQ104	Community Recommendations: PM2.5 must be monitored at all five BAM locations. Monitoring must continue until at least year 5 and preferably to year 9. Any decision by Director of Mines to allow PM10 measures as substitute for PM2.5 must be done in full consultation with community (see earlier discussion).	PM2.5/PM10	AQ079	Rex will follow the ML conditions and take best technical advice on where to monitor PM2.5 and PM10 to obtain the empirical relationships which will satisfy the Director of Mines. All this information will be provided to the DPC and EPA. Rex will be engaging with the community through the HMCV is fine to consult and keep the community well informed of progress on this matter.
	AQ105	Page 22: "location generally represents the closest privately owned residential areas to the site" – not at RP. This site is well away from nearest occupied house in middle of paddock. Not acceptable because: o This position totally fails to capture dust coming off E WRD and moving across the bay directly to RP.	Dust Monitoring Locations		Rex can consider moving the realtime dust monitor closer to Rogues Point, provided the location is suited according to our dust consultant.
	AQ106	At 18th June meeting, Rex presenter stated "that monitors were located between the mine and RP, so any dust that travels from the mine towards RP will be somewhere in this [inland] location". This is not accurate – as noted above, dust will travel across the bay to RP from the Eastern WRD.	Dust Monitoring Locations	AQ079	Dust does not travel in straight lines nor just across the bay as such, but disperses away from the source, being the mine. However the real time monitor will be moved closer to RP.
	AQ107	Table 8 of draft MP: "NE of site AFTER year 1....: monitoring to expand to this site when monitor from use of PM2.5 becomes available to also cover monitoring in this direction" – unacceptable. Means this location will be without any real time monitoring throughout construction (18 months) and first year of operations (total – 2.5 years.) Yet there are a number of permanently occupied dwellings at the very southern end of RP.	Dust Monitoring Locations	AQ079	Rex has now elected to have all five real time sites established from the start of construction and to operate continuously.
	AQ108	Power point presentation: Indicates monitor at RP until end of 1 st year when it could be shifted - this suggestion even worse. Means that RP would be left without any real time monitors for the duration of the mining operation at Hillside even though it will be the community most affected by dust emissions from the mine. Statement by Rex representative at Pine Point meeting: That has been updated. There will be a monitor there from day 1. ... In response to question about whether it will be shifted, responded: No. Which is it?	Dust Monitoring Locations	AQ079	See response above
	AQ109	Community Recommendations: Real time Monitors measuring PM10/2.5 and TSP must be located immediately adjacent to most southern permanently occupied house at Rogues Point close to the coast – not inland. Because of the curvature of the coast, dust from the extended Eastern WRD will travel directly to these houses across the bay, not overland. Hence, monitoring needs to pick up that dust as well as that which comes overland from more westerly sections of the mine. At a minimum, monitors must be in place and functioning when construction commences and remain there for duration of operations	Dust Monitoring Locations	AQ079	See responses above - a realtime monitor for PM10 will be site near Rogues Point from start of operations.
	AQ110	No real time continuous monitors along coastal side of eastern WRD immediately adjacent to Gulf. Monitoring of this coastal strip was a key issue raised at the 18th June meeting. Rex response – "there are no houses there" - shows a distinct lack of understanding of local concerns re the potential contamination of Gulf waters and marine life, and its attendant implications for professional/recreational fishing, the new marine reef at Rogues Point and tourism.	Dust Monitoring Locations		Rex and DPC consultants evaluation during the ML application showed that, even with the larger size operation generating more dust, there would be no impacts on marine waters from direct mine generated dust. In particular, now that there will be no concentrate loading at Ardrossan, the highest risk marine area is now eradicated. ML conditions for dust are mostly based around receptors and human health. After our community meeting, Rex has agreed to locate an additional dust deposition gauge along the eastern margin, between M4 and M12.
	AQ111	Rex's response at the 18th June meeting – that mobile monitoring stations could be moved to this stretch when weather conditions requires it - is not a sufficient solution for the following reasons: - Compared with BAMs, they lack the accuracy and precision of real time monitoring: see p.22 : "To collect data at sufficient resolution for dust that may leave the site"... "does not require high level of accuracy". At the meeting on 18th June, Rex presenter noted that "for boundary or early warning monitoring, don't need such precise numbers – just need to know whether dust is going up or if its elevated". So doesn't sound very precise. - The decision re the deployment of mobile monitoring stations (when and for how long) rests entirely with Rex. - The speed at which these monitors can be relocated may be too slow to pick up spikes in emission levels. 18th July meeting – noted that wind changes from NW to W occur very quickly and are amongst the strongest winds experienced here.	Dust Monitoring Locations	AQ084	Refer above

	AQ112	The need for monitoring along this stretch of coast has become more critical because of: o the substantial size increase under the new mine plan of the eastern WRD, o increase in longevity of use of Eastern WRD (from 4 or 5 years to over 10) o increased closeness of E WRD to the Gulf. Potential impacts on the new artificial reef at RP which, at its northern end, is approx. 1.5- 2 kms from the eastern WRD	Dust Monitoring Locations	AQ084	Rex's consultant has undertaken updated dust modelling allowing for the changed stockpiles, hence these have been taken into account.
	AQ113	Marine monitoring as described in the baseline study by Cooe will potentially detect problems only after damage has been caused. An ongoing early warning system is needed here	Dust Monitoring Locations	AQ084	As previously mentioned - there is no impact predicted by mine dust on marine waters. However, a marine monitoring program will be in place to confirm this. Refer to Coastal and Marine monitoring plan.
	AQ114	Community Recommendations: In order for Rex to demonstrate full compliance with all air quality and marine conditions, and to allay community concerns real time permanent monitoring must be located at some mid point along the eastern side of the tenement, adjacent to the Gulf. The issue of power supply must be resolved to allow this to occur.	Dust Monitoring Locations	AQ084	As mentioned above, Rex has agreed to an additional dust deposition gauge to be located along eastern boundary. This will provide data on both background (farm dust) and mine dust which may settle onto marine waters.
Monitoring of Chemical & Toxicological Composition of Air Emissions	AQ115	<i>DPC comment: "The lease contains air quality outcomes dealing with protection of public health and environment, including toxicological impacts on receptors.... The PEPR will provide details on Rex's response and management strategies if testing and monitoring identifies dust chemical concentrations could be an issue. (DSD response to questions re ML conditions – dated 3/7/15). This information is not contained in the draft MP. The lack of specificity - see page 24 - is of concern.</i>	Dust Impacts on Community	AQ038	High volume air sampler will take a 24 hour sample. These will be analysed for metals content - ie toxicological and chemical testing. These will be reported to DPC and EPA and included in HMCV and annual reports.
	AQ116	<i>Page 24: Monitoring for particular matter must comply with AS/NZS 3580.... Methods for sampling and analysis of ambient air ... What are the standards? What standards must be met, what will be measured and how often.</i>	Dust Impacts on Community		These are the applicable Australian Standards which Rex must adhere to for methods for sampling and analysis of ambient air, determination of particulate matter, etc. These are available on line, but are well known and understood by the DPC personnel.
	AQ117	Will composition be determined for PM10, 2.5 and TSP? Page 24 indicates 24 hour period every 6 days to measure TSP but no mention of PM10 and 2.5. This needs clarifying.	PM2.5/PM10		High volume air sampler measures all total suspended particles, including PM10 and PM2.5.
	AQ118	How often will the data be analysed? How will the results be reported to the community and how frequently? What strategies will Rex put in place if unacceptable levels identified?	Dust Impacts on Community		the HVAS samples will be sent to the laboratory in batches each month. Exceedance strategies are included in the AQMP. The real-time monitors and Trigger and Response Plan (TARP) show actions to be identified if dust levels are on the increase, well before any compliance limit is exceeded.
	AQ119	No. and location of monitoring stations? Will the high volume air sampler co-located with weather station be the only monitor for this condition? not, what other monitoring sources will be deployed? Where? this is only location, why here?	Dust Impacts on Community		The HVAS co-located with the weather station is measuring TSP, as well as the two realtime monitors located at M2 and M13.
	AQ120	Uranium - the MLP Response Document stated the Hillside operation will increase U238 and Radium 226 in soil concentrations on the southern edge of the mine by 12% and 5% resp. Why is there no monitoring of the composition of PM10 and PM2.5 in this southern section?	Uranium		As stated in the Response document No 40, the estimated calculation was based on the conservative assumption that all dust was mineralised dust (instead of only 1 part in 8 being mineralised), and still showed that the variation of U and Ra that could result within the soil due to dust was within the range naturally found in the soil in the area. Hence there is no impact from any likely dust.
Monitoring of TDD	AQ121	No monitors along coastal sides of eastern WRD other than at the far north and far south. Hence, no indication of amount of dust being deposited along coastal strip.	Dust Monitoring Locations		As mentioned above, Rex has agreed to an additional dust deposition gauge to be located along eastern boundary. This will provide data on both background (farm dust) and mine dust which may settle onto marine waters.
	AQ122	Location of dust monitor at RP a long way from nearest residences. Needs to be immediately adjacent to houses on southern end of RP, especially given their vulnerability to dust blown across the bay from the Eastern WRD.	Dust Monitoring Locations		Rex will relocate the realtime monitor closer to Rogues Point based on consultant recommendations.
	AQ123	No monitors at Black Point – <i>awaiting feedback from Progress Association</i> .	Dust Monitoring Locations		Rex has agreed to locate an additional TDD gauge near the closest Black Point residences, GREG
	AQ124	No monitors immediately north – ie midway between M19 and M2.	Dust Monitoring Locations		HVAS located at weather station site, plus again dust disperses when moving with wind - both M2 and M19 will cover the northern area. There may be other individual landowner TDD gauges in the area also
	AQ125	Farm locations – <i>awaiting feedback from farmers meeting</i>	Dust Monitoring Locations		We have taken into consideration feedback noted from the farmers meeting - in particular Rex will discuss with individual landowners siting of additional TDD gauges on adjacent properties.
	AQ126	30 days continuous - does this mean deposition will be collected every 30 days, but monitor remains operational the entire time?	Dust Monitoring Locations		Yes correct, except for the time it takes to change the filter paper
	AQ127	How feasible is it to differentiate between mine generated and background dust, given that data are collected only once per month, during which time wind speeds, direction etc are likely to have varied considerably?	Dust Monitoring Locations		To differentiate between mine generated and background dust is a matter of cross-comparing between monitoring locations to determine greatest accumulative locations. Rose diagrams will assist in the determination of wind/dust direction. This collective data can then be compared to operations to determine if there is a discrepancy where operations could not account for excessive dust.
	AQ128	When will collection commence – pre-construction?	Dust Monitoring Locations		Yes dust monitoring will commence prior to construction.
	AQ129	Are all dust deposition samples analysed by independent body?	Dust Monitoring Locations		Yes an independent laboratory is used.
	AQ130	What is being analysed? Presumably volume of deposition (as per condition), but no reference in MP to chemical and toxicological analysis of TDD. However, is this required to ensure Rex meets S6 Condition re no contamination of soils, crops etc.	Dust Monitoring Locations		TDD samples are measured for dust volume (after excluding organics and salt) and for copper. Chemical and toxicological analysis is carried out on HVAS samples.
Monitoring of Dust from Blasting	AQ131	• What criteria used to assess "excess fume emissions"? • What monitoring in place?	Dust Monitoring Locations		There is no lease requirement in place for odour monitoring, as all modelling (and experience at other mines) as indicated there will be no impact from odour.
	AQ132	P 24: Why this location. Given the strong on-shore winds especially in summer why is it located in the lee of the eastern WRD?	Weather Stations		Weather station location has to follow Australian Standards for siting considerations. This site complies with those considerations.

Weather Station	AQ133	P 25: 4 additional weather stations situated around mining operations area – co-located with compliance monitoring stations – which ones? There are presumably 5 BAMS so why 4 not 5 additional weather stations?	Weather Stations	AQ132	Four locations are more than adequate for wind direction and speed - M13 and M11 are close together and hence both do not need a weather station
Compliance Reporting	AQ134	P 18/ 25: annual compliance report insufficient for community accountability.	Compliance Reporting		Annual compliance reports and regular HMCV update reports will be made available. All parties can access the realtime dust website results on a continuous basis.
	AQ135	Is the annual compliance report the main document the regulator will rely on?	Compliance Reporting	AQ134	Both the annual compliance report, plus the regular HMCV reports, and any reporting by exception are made available to the DPC. All parties can access the realtime website dust results on a continuous basis.
	AQ136	Regular updates to HMCV – should be monthly and should be made publicly available.	Compliance Reporting	AQ134	HMCV reports will be tabled, and assume the HMCV will make these available.
	AQ137	Operational responses – eg decision to halt activities – will community be informed when that happens?	Compliance Reporting	AQ134	When internal trigger points are reached that are well within compliance limits, and we undertake certain actions, there is not a requirement to record or report these. The community will be informed at HMCV meetings on site actions as requested. Experience from other mines with local employees suggests that internal site operations like this are well known.
	AQ138	<i>MP page 23: "Reporting to accord with Condition 9, s 2"</i> . But this only applies to real time PM10 and PM2.5. Not TSP or TDD How often will results of TSP and TDD be reported to community? Farmers may want monthly results because timing of dust deposition will have more impact in some months than others. (Waiting for feedback from farmers) <i>DSD response: Any exceedance of TSP compliance criteria will constitute a failure – must be reported within 24 hours.</i> But given TSP and TDD based on monthly averages, there will clearly be a time lag from when deposition conditions were actually exceeded and when the monthly reading identified that exceedance.	TSP		Real time monitoring ensures quick response and reporting of exceedances. TDD are measured monthly with a lead time on results due to analysis. We reference the very low dust levels, and also very low trace levels of Cu that are involved. Both DPC and Rex consultant have shown that there will be no contamination of land from dust. The TDD and HVAS monitoring is to back this up.
AQ139	Page 19: Any exceedance will be notified to DSD. Will each exceedance be reported to community - What will be reported to DSD? - Will community be informed of DSD response?	Compliance Reporting	AQ136	Exceedances will be notified to DPC and investigated by Rex (and DPC if needed). HMCV will receive update reports which will contain this information.	
Public Complaints Register	AQ140	A response must be provided to each complainant, even if no action taken.	Exceedance Protocol	AQ024	Correct, this will be part of the protocol.
	AQ141	Record of level of complainant satisfaction with Rex's response.	Exceedance Protocol	AQ024	Rex will give complainant feedback as to measured levels, record action to mitigate concern and report if there was an exceedance.
	AQ142	If complainant not satisfied: reasons for dissatisfaction - details of further investigation (if undertaken) - if no further investigation by Rex, provide complainant with contact details for specific Government Regulator.	Exceedance Protocol	AQ024	Rex will investigate all complaints, and report to the individual follow up actions. If further information is sought we will try and satisfy, however complainants always have the ability to contact the DPC.
	AQ143	Time taken indicators: Time investigation commenced/completed. (This is critical. Rex have indicated that, following a dust complaint, a person "will travel to boundary of site closest to complainant." Any delay in doing so would render the investigation invalid because conditions may have changed). Time to respond to complainant Time to finalise complaint to satisfaction of complainant.	Exceedance Protocol	AQ024	Usually a visual inspection can be carried out quickly in the event of a complaint on dust. Real-time dust monitors and wind speed records also allow investigation of a complaint after the fact, as does the recording of equipment locations and work undertaken.
	AQ144	Complaints will inevitably be limited to TSP and (to a much lesser extent) TDD because of visibility. Unless there are clear performance indicators for health related issues, complaints about PM10/2.5 will be very difficult to lodge and investigate. (see earlier discussion re need for community measurement criteria for health and public nuisance impacts).	Exceedance Protocol	AQ024	The ML conditions, plus realtime monitoring of PM10 along with the variety of other dust monitors for the operations are comprehensive and will ensure potential dust impacts on health are managed. Nuisance dust as reported in a complaint may take longer to investigate and resolve, but Rex is committed to trying to do this.
Performance Indicators	AQ145	Page 28. Only 3 listed. Inadequate	Additional Requirements		These three KPI's are the most important to ensure Rex is following its compliance conditions, and working with the community to resolve issues.
	AQ146	Community Recommendations: As identified earlier, need specified performance indicators around community expectations re public nuisance and public health impacts, impacts on agriculture, • Need for regular (eg 6 month or 12 month) community survey – possibly managed by HMCV • Targets for responding to complaints: eg x% resolved within one day/one week/one month etc • % of complainants satisfied with investigation outcomes • 6 monthly community "satisfaction survey" re air emissions potentially auspiced by HMCV. Results to be published in YPCT, on HMCV website and distributed to stakeholders via HMCV email network.	Additional Requirements		Rex is willing to work on an ongoing basis with a HMCV air quality working group to evaluate air quality monitoring results, complaints, etc, and undertake community surveys as part of quality ongoing community engagement.
Management Plan Review	AQ147	P 29: "Plan will be reviewed and if necessary revised to satisfaction of DSD and consultation with relevant agencies". Community needs to be directly involved in any review, along with HMCV.	Additional Requirements		Refer above
	AQ148	If evidence of community dissatisfaction, need mechanism by which community can, itself, seek a review of the management plan.	Additional Requirements		Refer above
	AQ149	Should also be subject to ongoing review, not just annually, especially during early days of operation.	Additional Requirements		Rex needs to be compliant with its lease conditions, and has outlined a trigger and response plan with action levels below the compliance points. How the mine performs to these will be at the top of Rex's management actions and may result in some ongoing changes as needed.