

Ref: 21-0708P/01

29 July 2026

Office of the Coordinator-General

PO Box 15517

City East Queensland 4002

Via Email:

Attention:

RE: Response to Information Request

SDA Application for a Material Change of Use for Special industry (Bromelton Energy and Resource Centre) in the Bromelton SDA – AP2026/001

Lot 1 Beaudesert Boonah Road, Bromelton QLD 4285 (Lot 1 on RP45234)

Dear ,

We refer to the Office of the Coordinator-General's (OCG) Information Request, dated 1 May 2026, in relation to the above-described SDA Application (AP2026/001) and the email from of DETSI dated 2 June 2026 providing further information request items, and herein provide a full response in accordance with Schedule 2, Part 2, Section 2.2 of the Bromelton SDA Development Scheme (December 2017).

We request that OCG provide this response to all referral entities, by written notice, within five (5) business days and request that the referral entities process with the assessment of the application in accordance with Schedule 2, Part 2.2 of the Bromelton SDA Development Scheme.

Should you have any further queries regarding this application, please do not hesitate to contact Andrew Crawford / Gabriella Tomarchio on .

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'AC', written over a light blue horizontal line.

Andrew Crawford
EXECUTIVE DIRECTOR

Response to Information Request

Supporting Material

This response is supported by the following information:

Document Title	Prepared By	Date
Response Notes		
Technical Note (Item 1)	Arup	26.06.2026
Technical Note (Items 2 & 3)	Arup	21.07.2026
Technical Note (Items 4 – 6)	Arup	27.06.2026
Technical Note (Items 7 & 10)	Arup	10.07.2026
Technical Note (Item 8)	Arup	11.05.2026
Technical Note (Items 9 & 11)	Arup	26.06.2026
Technical Note (Item 35)	Cleanaway	28.07.2026
Technical Note (Items 42 & 43)	Ramboll	20.07.2026
Air Quality Assessment Technical Memorandum	Katestone	8.06.2026
Greenhouse Gas Assessment Technical Memorandum	Katestone	15.06.2026
Human Health Technical Memorandum	EnRisks	16.07.2026
Updated Technical Reports		
Air Quality Technical Report (Revision D)	Katestone	22.06.2026
Concept Civil Design Drawings	Arup	29.07.2026
Engineering (Infrastructure) Report (Revision D)	Arup	21.07.2026
Greenhouse Gas Assessment (Revision D)	Katestone	15.06.2026
Hazard and Risks Assessment (Revision D)	Arup	2.07.2026
Human Health Risk Assessment (Revision E)	EnRisks	15.07.2026
Pavement Impact Assessment Technical Note (Revision B)	Arup	26.06.2026
Planning Report	Therefor Group	24.07.2026
Socio-Economic Impact Assessment (Revision D)	Arup	21.07.2026
Stormwater Management Plan and Flood Risk Assessment (Revision D)	Arup	28.07.2026
Technical Process Description (revision D)	Arup	27.07.2026
Traffic Impact Assessment (Version D)	Arup	27.07.2026
Waste Feedstock Report (Revision D)	Arup	27.07.2026
Additional Information		
BERC-ARU-BNE-CICW-SKT-2010_etransmit	Arup	30.06.2026

Queensland's Waste Strategy

The Queensland Government has recently released the new waste strategy '*Less Landfill, More Recycling 2035: Queensland Waste Strategy*' (July 2026) which seeks to boost Queensland's recycling rate every year and reduce the amount of waste sent to landfill. The strategy is guided by three priorities:

- **Making recycling easy** for Queenslanders in everyday life
- **Investing in modern infrastructure** to turn waste into new products
- **Establishing strong end markets** where recycled materials are cost-effective and meeting performance standards.

The waste strategy identifies that one of the benefits of boosting recycling is reduced emissions by reducing waste going to landfill. In addition to recycling, the strategy states that investing in technologies such as energy from waste and landfill gas capture, will contribute to cutting greenhouse gas emissions and create economic opportunities through carbon credits. It is noted that the development of energy from waste facilities will be a critical component of Queensland's waste management strategy over the next decade. In this regard, the Project aligns with the waste strategy objectives and intended outcomes, and provides key infrastructure to address waste management in Queensland.

Response to Information Request

The project team has undertaken a comprehensive review of the Information Request and prepared a detailed response to each of the matters raised. Matters are addressed in the context of relevant assessment benchmarks including inter alia, the Bromelton SDA Development Scheme; State Codes, Seqwater Development Guidelines, Scenic Rim Regional Council Planning Scheme, Environmental Protection Act and Regulation, and other relevant legislation, technical standards, guidelines and specifications.

In addition, technical reports have been updated to ensure they accurately reflect additional assessment, further analysis, and any new information provided in support of the response. During this process, further clarification on matters was sought via the OCG, as required, to ensure the submitted responses and updated reports fully address the matters raised. Importantly:

- The Stormwater Management Plan and Flood Risk Assessment has been revised to updated Appendix B – Concept Civil Drawings only in response to the changed intersection dedication boundary as requested by TMR. No other changes have been made to this report.
- The Traffic Impact Assessment has been revised to update the intersection drawing contained in Appendix N. No other changes have been made to this report.

Further to the revisions to technical reports, corresponding updates have also been undertaken to the Planning Report. Specifically, the overview of technical reports detailed in Section 7 are subject to amendments to reflect the updated assessments to maintain across the application material. In particular:

- Hazard and Risk Assessment (Section 7.6).
- Greenhouse Gas Assessment (Section 7.11).
- Traffic Impact Assessment (Section 7.13).
- Human Health Risk Assessment (Section 7.17).
- Socioeconomic Impact Assessment (Section 7.18).

Please refer to the balance of this letter for a full response to the Information Request.

Item 1 – Drainage plan

The Biodiversity Technical report (reference ERC-ARU-BNE-ENFF-RPT-0001, Rev C) submitted as part of the application material includes a recommendation to improve ecological connectivity on site, including along the degraded drainage line that runs west-east through the centre of the proposed development, flowing through to the interstate rail line. The general arrangement plan (drawing no. BERC-ARUP-BNE-ARAR-DRG-001202, Issue R03) highlights existing dams on the site and proposed plantings to the north of the drainage line but does not show any environmental improvement to the south of the drainage line. Mapping the drainage line and proposed improvements (north and south of the drainage line) would be beneficial to understanding how the project will improve the degraded drainage path for better ecological values and stormwater pathing.

The proponent is requested to provide a separate drainage plan, highlighting the drainage path and any vegetation to be planted along the route to improve ecological values and stormwater pathing.

Response

As outlined in the **Technical Note (Item 1)** prepared by Arup, the proposed development seeks to enhance ecological connectivity across the site, including along the degraded drainage line that traverses the central portion of the site in a west-east direction. An updated Site Plan (Overland Flow Path, Ecological Enhancement Opportunity) accompanies the abovementioned technical note and has been prepared in accordance with the recommendations of the submitted Biodiversity Technical Report. The plan proposes revegetation planting on both the northern and southern sides of the drainage line to improve ecological connectivity and habitat values.

Importantly, the proposed development is not requiring removal of vegetation along this drainage line. Rather, the proposed revegetation planting facilitates a net improvement in ecological connectivity and overall environmental values of the site, in accordance with Sections 2.5.8 (Water quality) and 2.5.11 (Environment, Cultural Heritage and Community) of the SDA Development Scheme.

Item 2 – Socio-economic impact assessment

The socio-economic impact assessment submitted as part of the application material (reference BERC-ARUP-BNE-SIA-RPT-0001, rev C) contains impact tables (Table 10-11) identifying potential social impacts from the project. In some of the descriptions of the impact, there is an initial evaluation that may require amending, including:

- Table 10 Way of Life: consider scope to further mitigate impact in lieu of no traffic impact assessment for construction (e.g. could buses be used to transport workers to and from site, could timing for workers on site be staggered to reduce impacts at particular times). Alternatively prepare a traffic impact assessment for construction phase to specifically understand level of impact.
- Table 10 Culture and Heritage: there is no mention or recommendation of the test pitting recommendation identified in the Aboriginal and Cultural Heritage Assessment
- Table 10 Community Safety and Access to Resources: comments regarding risk to water bodies and therefore the local community may need updating following the further IR items in this enclosure
- Table 10 Health and Wellbeing: comments regarding Air Quality Assessment (AQA) may need to be updated following the further IR items in this enclosure
- Table 11 Community Values and Function: comments regarding AQA may need to be updated following the further IR items in this enclosure
- Table 11 Way of Life: states that impacts to amenity would be of a 'minor' magnitude, such as closing windows and spending less time outdoors. However, these changes would constitute major behavioural changes and therefore the assessment of this impact should be amended to reflect this.
- Table 11 Health and Wellbeing: comments regarding AQA may need to be updated following the further IR items in this enclosure

The proponent is requested to submit a revised socio-economic impact assessment with amended impact assessments (tables 10 and 11) where required to appropriately capture and assess social impacts and propose appropriate mitigation.

Response

Please refer to the updated **Socio-Economic Impact Assessment (Revision D)** and the **Technical Note (Items 2 & 3)** prepared by Arup as a response to this item.

As outlined in the Technical Note, the above matters have now been integrated into the updated Socio-Economic Impact Assessment. The updated assessment of these additional matters does not introduce any material change to the socio-economic impacts of the proposed development.

Section 7.18 of the **Planning Report** has also been revised to reflect the updated assessment findings and to represent the feedback from community and stakeholders obtained during the comprehensive community engagement program to date.

The **Socio-Economic Impact Assessment** concludes that the Project has the potential to generate both positive and negative socio-economic outcomes. The extent to which positive outcomes are realised, and potential adverse impacts are minimised, will depend on the effective implementation of the proposed mitigation, management and enhancement measures throughout the Project lifecycle. Notwithstanding the above, implementation of the recommended mitigation and enhancement measures and a Social Impact Management Plan will ensure that the Project complies with Queensland Social Impact Assessment Guideline 2025.

Item 3 – Negative Impacts

The socio-economic impact assessment contains impact assessment tables evaluating the risk of various social impacts identified to be generated by the project. Several proposed impacts are considered to have a minor magnitude of impact but do not consider the ramifications of any potential system failure in the operation of the facility (such as exceedance of emission levels). While this is considered unlikely, the impacts of any system failure should be considered as part of the social impact assessment.

The proponent is requested to submit a revised socio-economic impact assessment having reviewed all impacts (including likelihood and magnitude), with a scope of potential outcomes if there were to be an exceedance of approved emissions.

Response

Please refer to the updated **Socio-Economic Impact Assessment (Revision D)** and the **Technical Note (Items 2 & 3)** prepared by Arup as a response to this item. The assessment has considered a conservative scenario in which short-term exceedance of approved emission limits occurs due to a temporary system failure. The assessment has concluded that whilst this event is unlikely, any exceedance is expected to be of short duration due to the design controls, operational procedures and continuous monitoring systems in place. As a corollary, the short duration of such an event is not determined to introduce unacceptable socio-economic impacts.

Item 4 – Proposed intersection

The Traffic Impact Assessment report submitted as part of the application material (dated 10 February 2025, reference BERC-ARU-BNE-TTMM-RPT-0002, version C) proposes primary access via a new four-way signalised intersection at Beaudesert Boonah Road and Recycling Street.

According to Figure 6.6 and Appendix N of the submitted TIA report, the existing westbound lane on Beaudesert Boonah Road will be shifted to the south with pavement widening and tie back into the existing Beaudesert Boonah Road panel to the west that is under construction. It is currently unclear whether the proposed intersection will integrate with the current upgrade works at Mitchell Road that are currently underway and approaching completion.

The proponent is requested to demonstrate that the proposed access intersection design and the interface can be achieved with the Mitchell Road upgrade under normal design domain. Additionally, the applicant should identify any need for design exceptions early, noting these will require approval by TMR's Regional Director and, if unresolved, may delay the project at the road works application stage.

Note: Design drawings for the intersection works at Mitchell Road had been provided to Cleanaway previously that can assist with any integration works.

Response

Please refer to the updated **Traffic Impact Assessment (Version D)** and **Technical Note (Items 4-6)** prepared by Arup for further information.

As per the response to Item 4, a design review has been undertaken within the normal design domain which confirms that the new 4-way signalised intersection can be achieved in concert with the Mitchell Road upgrade without reliance on design exceptions. Minor amendments to the signalised intersection design have been incorporated and this is presented in the updated design drawings in Appendix N of the above referenced updated Traffic Impact Assessment. These updated drawings also illustrate the interface between the respective intersections.

The updated design drawings reinforce compliance of the proposed development with Table 2 of State Code 1: Development in a state-controlled road environment. Specifically, the proposed site access and intersection design:

- Complies with PO15 of the Code as the location, design and operation of the new access to the state-controlled road does not compromise the safety of users of the state-controlled road.
- Complies with PO16 of the Code, as the location, design and operation of the new access does not adversely impact the functional requirements of the state controlled road.
- Complies with PO25 of the Code, as the development does not compromise the safety of users of the state-controlled road network.

Item 5 – Drawings of land dedication

The land dedication to TMR for potential future road upgrade are shown in the submitted material to include dimensions to demonstrate that an additional lane (min 3.5m wide) and future verge (min 4.5m wide) is achieved.

Appendix B2 Civil Engineering Drawings BERC-ARU-BNE-CICW-DRG-1612 notates the indicative position of the stormwater crossing under new junction. The land dedication for the Beaudesert Boonah Road signals will need to extend into the property to the tangent of the kerb returns. The extent of the proposed culvert (including headwalls) should be considered in the establishment of the land dedication. The proponent is requested to provide the electronic drawing files (.dwg, .12da) of the proposed access intersection to clarify the embankment and drainage implications of the proposed intersection and assist in the delivery / integration of a future four-lane upgrade of Beaudesert Boonah Road west of the railway.

Note: the proposed culvert (including headwalls) must be relocated outside of the land dedication area to ensure there are no future stormwater impacts on the state-controlled road planned upgrades and that these structures do not impede the delivery of the project.

Response

Please refer to the updated **Engineering (Infrastructure) Report (revision D)** and **Technical Note (Items 4-6)** prepared by Arup for further information.

The civil engineering drawings are updated to reflect the land dedication requirement, being a minimum 3.5m additional traffic lane and minimum 4.5m future verge. This demonstrates compliance with Table 2 of State Code 1: Development in a state-controlled road environment. Specifically, the proposed site access and intersection design:

- Complies with PO17 of the Code as the location, design and operation of the new access is consistent with and accommodates the future intent of the state-controlled road.
- Complies with PO29 of the Code, as the development does not impede delivery of planned upgrades of state-controlled roads.

The stormwater infrastructure associated with the proposed intersection has been revised to ensure all elements (including the headwall) are located within the land dedication area for the future intersection. The drainage infrastructure complies with PO13 of the State Code 1 as it does not create a safety hazard for users of the stated controlled road and also complies with PO14 of Code as it is designed to ensure the structural integrity and physical condition of existing drainage infrastructure and the surrounding drainage network.

The updated electronic design files for the proposed intersection are included in this submission (refer BERC-ARU-BNE-CICW-SKT-2010_estransmit). The proposed amendments to stormwater drainage as described above do not compromise the establishment and operation of existing or planned infrastructure in accordance with Section 2.5.2 of the SDA Development Scheme.

Item 6 – Pavement impact assessment

The Pavement Impact Assessment report submitted as part of the application material (dated 4 March 2026, reference 293683-69-ARU-00CIPA-TNE-000001) includes road links where development traffic exceeds $\geq 5\%$ of background loading in the opening year (2032). The following state-controlled roads exceed the 5% threshold:

- Beaudesert Boonah Road
- Mount Lindesay Highway (Brisbane–Beaudesert)

Assumptions such as 100% operational capacity from Day 1 and exclusive use of B doubles likely overstate pavement demand. However, the pavement impact assessment methodology aligns with the TMR Pavement Impact Assessment Guide. The assessment adopts the prescribed marginal cost methodology, correctly applies Standard Axle Repetitions (SARs), uses TMR provided road asset data, applies the 5% traffic loading threshold, and calculates pavement contributions over the required 20 year post opening period.

The assessment is considered conservative as it assumes 100% operating capacity from the start of the development operation. Furthermore, it assumes the largest vehicles to be B-double as the roads are currently approved for B-doubles. Should PBS vehicles (A double) be utilised in the operational stage, the number of vehicles may reduce. As a result, the proposed contribution rate per heavy vehicle may not reflect the flexibility the applicant is seeking for relating to contributions as indicated in the report. As such, contribution rate per tonne may potentially be more appropriate as the contribution required from the development because it relies on the actual operation capacity from the development on an annual basis regardless of the type and number of vehicles used.

The proponent is requested to provide further information regarding potential contribution rate per tonne based on the assumed max operational capacity utilised in the PIA. All relevant details associated with the determination of the contribution rate per tonne must be provided.

Note: Whilst it is understood that there are assumptions made in the pavement impact assessment and there are factors that may materially influence the final pavement contribution value as the project progresses and more realistic operational capacity is known, it is important for the applicant to note that any conditions relating to pavement contribution at this stage can only be determined based on the information available to TMR.

Should further information on waste contracts and vehicle fleet composition become available as the project progresses that will materially change the pavement impact expected, the applicant can lodge a change application to have the conditions relating to pavement contribution reviewed and revised to better reflect the actual operational capacity of the development.

Response

Please refer to the **Technical Note (Items 4-6) and Pavement Impact Assessment Technical Note (Revision B)** prepared by Arup for further information. The amended assessment incorporates the recommendations regarding assumptions and methodology as appropriate and ensures the proposed development achieves compliance with PO28 of State Code 1.

Item 7 – Dangerous goods near rail corridor

The Pavement Impact Assessment report submitted as part of the application material (reference BERC-ARU-BNE-ENRI-RPT-0001, revision C) has not adequately addressed dangerous goods in relation to the railway corridor or the prelodgement advice given about this matter.

In particular, the report only addresses Major Hazard Facilities (under State Code 21) and Work Health and Safety requirements. Table 2 does not adequately set out the quantities and hazardous chemical types/classes as per Table 5.2 of the Model Planning Scheme Development Code. It is likely that some of the dangerous goods thresholds set out in AO26.1 of PO26 of State Code 2 – Development in a Railway Environment of the State Development Assessment Provisions will be exceeded such as for diesel.

The proponent is requested to amend the Hazards and Risks Assessment to demonstrate how the proposed development will comply with PO26, Table 2.1, of State Code 2: Development in a Railway Environment of the State Development Assessment Provisions and Section 2.6 of the Guide to Development in a Transport Environment: Rail. In particular, provide details of the components or aspects of the proposed development likely to involve the storage and handling of dangerous goods. The applicant should confirm the types and quantities of dangerous goods to be stored and handled on the site and whether these are above the threshold quantities identified in AO26.1, being Table 5.2 of the Model Planning Scheme Code for Hazardous Industries and Chemicals. In particular, the classifications of hazardous chemicals and the measurement units used for quantities should allow a direct comparison with Table 5.2 of the Model Code.

Where the thresholds are exceeded, the applicant is required to provide information demonstrating how the proposed development will be designed and constructed to minimise the impacts of a fire, explosion, spill, gas emission or dangerous goods incident on the railway corridor. This should consider that fire-fighting infrastructure will be limited to on-site water storage and therefore potentially limited in capacity, increasing risk.

Provide a Registered Professional Engineer of Queensland (RPEQ) certified risk assessment in accordance with Chapter 2.6 – Dangerous Goods and Fire Safety and Appendix 1 – Development Risk Assessment Guide of the Guide to Development in a Transport Environment: Rail, demonstrating how measures will be incorporated into the development design to minimise the identified risks. This should address the following risks, amongst other identified risks:

- minimising or controlling the outbreak of fire
- controlling smoke and/or gas release dispersion
- minimising heat build-up in structures
- limiting the possibility of structural components being blast damaged
- providing stability or contingency measures in the proposed development
- providing safe emergency access and egress to and from the railway corridor
- ensuring effective containment and clean-up of dangerous goods incidents.

The risk assessment should consider that the railway corridor can be a source of ignition, for example, due to overhead line equipment, rollingstock wheel to rail contact and braking, exhaust sparks from locomotive engines, heat from locomotive engine parts and rollingstock wheels, and from track maintenance work such as slashing.

The risk assessment should include consequence contour mapping for each type of safety incident showing the maximum hazard extent in relation to the railway corridor. The storage and handling of goods will be required to comply with relevant Australian Standards.

An Emergency Response Plan (ERP) should be provided that:

- identifies the emergency contact details for the railway manager (ARTC).
- includes an escalation process where the railway manager is required to be immediately notified of any
- incident so that rail operations can be appropriately managed.

- establishes an emergency response procedure for the railway corridor to be applied during
- incidents/emergencies in agreement with the railway manager.

Response

Firstly, it is understood that reference to the Pavement impact Assessment above is in error and the intended reference is the Hazards and Risks Assessment. Please refer to the updated **Hazards and Risk Assessment (Revision D)** and **Technical Note (Items 7 & 10)** prepared by Arup for further information.

An RPEQ certified Rail-Specific Risk Assessment has been prepared in accordance with Chapter 2.6 – Dangerous Goods and Fire Safety and Appendix 1 – Development Risk Assessment Guide of the Guide to Development in a Transport Environment: Rail. Where relevant thresholds are exceeded, these have been clearly identified and assessed (refer Section 4 – Table 5).

This assessment is provided as Appendix B to the Hazards and Risks Assessment. The above referenced Technical Note states that this assessment identified no credible fire scenario exists in which diesel can impact on the rail corridor. This is further supported by a drawing (refer to Appendix C of Hazards and Risks Assessment) which illustrates the spatial separation between hazardous goods storage areas and the railway corridor. In addition, the report recommends that an Emergency Response Plan (ERP) be prepared in respect of these matters prior to operation.

The Rail Specific Assessment appropriately demonstrates the proposed development involving dangerous goods does not adversely impact on the safety or operations of the railway and rail transport infrastructure, and therefore complies with PO26 of State Code 2: Development in a railway environment.

Item 8 – Earthworks

The Civil Engineering Drawing Set submitted as part of the application material (dated 19 December, document reference BERC-ARU-BNE-ENG-RPT-0001, revision C) provides a difficult to execute earthworks proposal.

In particular, this will contain the development on a raised earthworks pad to a finished level of about 88.5m AHD in proximity to the railway corridor. The embankment structure will feature 1:3 batters down to a batter toe at 75m AHD, setback a minimum of around 5m from the railway corridor. Whilst the Engineering (Infrastructure) Report states that the Department of Transport and Main Roads technical specifications will be complied with, it is unclear as to whether this can be achieved.

The proponent is requested to obtain a RPEQ geotechnical investigation and undertake preliminary RPEQ certified structural engineering design to ensure that an earthworks proposal with adequate stability and compaction can be achieved. Otherwise, it is likely that the development may have to be redesigned, including the interface with the railway corridor. The current design proposal may have limited flexibility if the earthworks design needs to change at detailed design. In addition to geotechnical and structural considerations, cost may also dictate whether the earthworks design needs to alter.

Response

Please refer to the **Technical Note (Item 8)** prepared by Arup for further information.

In 2023 Douglas Partners undertook geotechnical site investigations and the key findings, including borehole sample outcomes are included in the submitted Preliminary Site Investigation for Contamination (Douglas Partners, 219361.01, December 2025). A review of this document indicates that existing ground conditions in the location of the fill embankment comprise of shallow firm topsoil overlying stiff to hard residual soils typically described as medium to high plasticity silty Clay. These ground conditions are considered good/suitable for supporting the proposed ~9 m high fill embankment.

The Technical Note states the preliminary earthworks plans have been reviewed taking into account the geotechnical investigations and it is considered that there is sufficient tolerance within the design strategy to ensure that an earthworks proposal with adequate stability and compaction can be achieved. In addition, and as previously confirmed, the proposed gradient batter slope ties into the existing ground levels at a minimum of 5m inside the lot boundary in accordance with PO33 of State Code 2.

Item 9 – On-site wastewater

The Engineering (Infrastructure) report submitted as part of the application material (dated 19 December 2025, Reference BERC-ARU-BNE-ENG-RPT-0001) Section 3.2.3.2 states that the concept design provisions include a 25,000 L sewer holding tank capacity serving the EfW building and a 5,000 L sewer retention capacity serving the IBA sorting building. Although the report notes these details are shown in concept engineering drawing BERC-ARU-BNE-CICW-DRG-1801, this drawing does not appear to be included in the documents available.

It is noted that the proposed development is intended to connect to future trunk wastewater when it becomes available.

The proponent is requested to provide the following information to confirm compliance with the Seqwater development guidelines:

- Include details regarding if the effluent wastewater is proposed to be pre-treated prior to storage, or if raw sewage is proposed to be stored on site, for treatment and disposal off-site
- The referenced engineering concept drawing (BERC-ARU-BNE-CICW-DRG-1801) which includes the location of the effluent wastewater storage on the site.

Response

The proposed development provides an interim servicing solution to cater for sewerage wastewater for each of the buildings which will house staff, until such time that the trunk sewer main is constructed and operational along Beaudesert Boonah Road. Please refer to the **Technical Note (Items 9 & 11)** and the updated **Engineering (Infrastructure) Report (Revision D)** prepared by Arup for further information. The referenced drawing was inadvertently omitted from the submitted documentation and has been included with this response.

Importantly, the proposed interim wastewater solution complies with AO7.5 of the Seqwater Development Guidelines and PO18 the General Development Provisions Code (Scenic Rim Planning Scheme 2020), as the Proponent will enter into a contract with a licensed waste removal contractor for scheduled pump out of sewerage.

Item 10 – Hazardous substances

The Planning and Assessment Report (dated 18 February 2026, revision 5) lists the following goods stored in quantities over 200kg/200L: hydraulic oil/lubrication oil, activated carbon, 25% aqueous ammonia solution, propane/acetylene, sodium hydroxide, hydrochloric acid, air pollution control residue (including stabilised curing/cured APCr) and diesel.

The Seqwater Development Guidelines (October 2024 version), Acceptable Outcome AO28.2, requires that dangerous/hazardous substances stored in quantities above 200kg/200L maintain a minimum 100m setback to all watercourses. Although the planning and assessment report/Hazard and Risk Assessment report (reference BERC-ARU-BNE-ENRI-RPT-0001, dated 22 January 2026) denote the quantities of hazardous materials to be stored on site and the risk management measures associated with their storage, it remains unclear where these materials are proposed to be stored within the facility. The architectural plans do not clarify storage locations in relation to watercourses identified on site, nor how these materials will be stored specifically, with only general references to Australian Standards included.

The proponent is requested to provide additional information to demonstrate compliance with Acceptable Outcome AO28 of the Seqwater Development Guidelines (2024), including:

- Detailed drawings of storage facilities

- A plan showing the specific location of diesel within the building
- Building components (i.e. bunded edges, floor pad permeability rating etc)
- Secondary containment methods with at least 110% spill recovery capacity, or industry standard, whichever is greatest
- Product details for storage vessels
- Procedures and notifications in the event of a spill
- Spill kit contents, location and signage.

Response

Please refer to the updated **Hazards and Risk Assessment (Revision D)** and **Technical Note (Items 7 & 10)** prepared by Arup for further information.

The proposal complies with the acceptable outcomes of the Seqwater Development Guidelines 2024, as follows:

- The proposal includes the storage and handling of hazardous chemicals exceeding 200L or 200kg, and therefore does not comply with AO28.1. Accordingly, compliance needs to be demonstrated with AO28.2 and AO28.3, OR AO28.4.
- In this instance the proposal is considered to comply with both alternatives as follows:
 - The proposal complies with AO28.2 as storage is more than 100m from the watercourse that traverses the site, and there is no potable water supply within a 800m separation distance, AND
 - The proposal complies with AO28.3 as the dangerous goods, hazardous substances or environmentally hazardous materials are capable of being stored in a manner as specified in the code (and this can be secured through conditions as required).
 - In addition, a Site-Specific Risk Assessment –Water Quality (refer Appendix D of the Hazards and Risk Report Rev D) has been prepared, which determines that the facility “is designed so dangerous goods, hazardous substances or environmentally hazardous materials are stored and handled in a manner that minimises the potential for the release of hazardous materials and chemicals to drinking water source areas during a potential contamination event”, consistent with AO28.4.

Achievement of the above outcomes also contributes to the applicant’s compliance with SDA wide assessment criterion 2.5.8 regarding water quality outcomes.

Item 11 – Water Supply

Seqwater is currently evaluating the capacity of the Beaudesert WTP with regards to the proposed development’s projected water usage. Seqwater reiterates its concerns surrounding interim uncertainty of supply until 2032 (optimally, possibly later), particularly for large water users. These concerns relate to both the construction and operational phases of the proposed BERC, with estimated water demand during construction not provided, and during operation estimated at 0.5ML/d (approximately 180 ML/per annum) from day one.

Continued coordination and communication are required to ensure water supply is viable for operation of the development, considering full water flow rate is expected for day one of operations.

The proponent is requested to provide further details regarding the expected water usage during the construction phase of the development and approximate timeframes for construction of the proposed facility.

Response

Please respond to the **Technical Note (Items 9 & 11)** prepared by Arup for further information which provides a comprehensive response to this matter. Cleanaway is committed to ongoing coordination with Seqwater and Queensland Urban Utilities will continue throughout detailed design, construction, and operation to ensure that both construction and operational water demands can be appropriately managed.

Item 12 – Emissions monitoring methods

The Air Quality Assessment (AQA) provided as part of the application material (reference D24578-11, revision C) contains reference to the Waste Incineration (WI) Best Available Techniques Reference Documents (BREF) that outlines approximately 37 Best Available Techniques (BAT) requirements, including BAT 4, which mandates that emissions to air must be monitored using European (EN) standards. If EN standards are unavailable, ISO, national, or other international standards of equivalent scientific quality must be used. In Queensland, Australian Standards (AS), which are largely based on US EPA standards, are used. The AQA report did not provide a clear comparison of the monitoring results obtained using EN or AS. Further to this, no information was provided if any of the Australian laboratories are NATA-accredited for EN standards. A discussion on EN monitoring standard equivalence to AS is crucial to understanding the application of WI BREF to the assessment of air emissions from the proposed development and subsequently to conditioning of the proposal.

The proponent is requested to submit a revised AQA report with a section discussing EN monitoring standards and Australian Standards, including an assessment of the scientific equivalence of the two methods and clarification if any Australian Standards or EN standards will be used. The applicable Australian Standards must be identified for each parameter.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which discusses the proposed monitoring standards. This response provides an analysis of the scientific equivalence of Australian Standards and EN Standards, and documents the proposed test methods and supporting rationale. The recommendations align with the updated **Air Quality Assessment (Revision D)**.

Item 13 – Cumulative impacts

Section 4.5 of the AQA report discusses future industries within a 20 km radius of the project, which represents the modelling domain of the local airshed. However, the report does not include consideration of the future Kalfresh Scenic Rim industrial project, located approximately 18 km from the proposed BERC facility. This project includes composting, an anaerobic digester, and a biogas power generator, which may contribute to cumulative air quality impacts in the region.

The proponent is requested to submit a revised AQA report to include a discussion of the potential air quality impacts of the Kalfresh Scenic Rim industrial project and its contribution to the local airshed. This should include an assessment of the cumulative impacts of emissions from the proposed BERC facility and the future Kalfresh project within the 20 km modelling domain.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which provides a response to this item, and demonstrates, inter alia, that the Kalfresh Scenic Rim industrial project is located more than 33km from the BERC project and not 18km as suggested. Acknowledging the substantial separation distance between the two projects, the localised nature of the predicted impacts identified in the Kalfresh assessment and the low predicted off-site pollutant concentrations associated with each development, the response concludes that cumulative air quality impacts between the Kalfresh Scenic Rim Industrial Project and the proposed BERC facility are considered unlikely. On this basis, the conclusions of the BERC Air Quality Assessment regarding compliance with applicable air quality objectives and acceptable impacts to the local airshed remain unchanged.

Item 14 – Worst case scenario modelling

Section 5.2.4 of the AQA report discusses dispersion modelling scenarios but assumes a worst-case scenario where one line operates at short-term emission limits while the other operates at the daily average (upper) concentration limit. This does not represent the true worst-case scenario, as emissions would be significantly higher if both lines were operating at short-term emission limits. Under non-routine conditions, it is possible for both lines to operate at short-term limits, which has not been accounted for in the modelling.

The proponent is requested to submit a revised AQA report to include a scenario where both lines are operating at short-term emission limits to accurately assess the worst-case impact.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which sets out the facts and circumstances supporting the adopted scenario testing and outlines why the above referenced is not adopted as an appropriate worst case scenario. .

Item 15 – Potential final design changes

The modelled mass emission rates for the Flue Gas Treatment (FGT) stack were estimated using EU BREF concentration limits for waste incineration and boiler design specifications, based on the flue gas volume flow rate. However, the project design is not yet finalised, and there is a possibility that stack parameters may change after the selection of the moving grate technology provider and finalisation of the project components. These changes could affect the emission rates and the modelled ground-level concentrations (GLC).

The proponent is requested to submit a revised AQA report to include a discussion on how potential changes to the final design, including stack parameters and technology specifications, may impact the estimated emission rates and the modelled GLC. This should also address how such changes will be managed to ensure compliance with air quality objectives and environmental standards.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which provides a detailed response to this item. The memorandum states that there exist sufficient design margin within the adopted modelling approach to account for the final selection of the moving grate and FGT technology providers. The response discusses the key design parameters and demonstrates why the air quality assessment is sufficiently conservative to accommodate the final design. The response concludes by noting that any future changes to final stack or technology design will be reviewed against this conservative modelling basis and additional assessment will be undertaken if required to ensure ongoing compliance with air quality objectives and environmental standards.

Item 16 – North Maclean Air Quality Monitoring Data

The AQA report utilised data from the Springwood and Woolloongabba monitoring sites to represent background conditions for PM10, PM2.5, NO2, and SO2 in the Bromelton State Development Area (SDA). However, there is a DETSI air quality monitoring station located at North Maclean, approximately 25 km from the SDA, which is significantly closer to the proposed facility than the Springwood site. The North Maclean station has been operational since 1994 and monitors relevant parameters, with data available since 2000. The report does not explain why data from this closer and more relevant monitoring station was not used for the background analysis.

The proponent is requested to submit a revised AQA report with a justification for not using data from the North Maclean air quality monitoring station for background analysis. If the data is deemed unsuitable, the reasons for its exclusion should be clearly explained. Alternatively, the report should incorporate data from the North Maclean station to provide a more accurate representation of background air quality conditions in the study area.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which outlines matters including data relevant to the North Maclean monitoring site. The response also states that Section 4.4.2 of the **Air Quality Technical Report (Revision D)** has been updated to incorporate the North Maclean data to transparently document the basis for background selection. The air quality modelling will continue to adopt the Springwood (and Woolloongabba) datasets, as these provide a more conservative representation of background conditions and are considered appropriate for assessing potential impacts of the Project.

Item 17 – Actual flue gas flow rate

The AQA report provides stack characteristics for Load Point 1 (LP1) and Load Point 2 (LP2) in Table 16, stating that the actual flow rate of flue gas (wet basis) was used to size each flue and calculate the exhaust exit velocity. However, it is unclear how the actual flow rate of flue gas (wet basis) was determined. Additionally, there is a possibility that stack parameters, including the flue gas flow rate, may change after the selection of the moving grate technology provider, potentially impacting the exhaust exit velocity and dispersion modelling.

The proponent is requested to submit a revised AQA report with a justification of the methodology used to determine the actual flow rate of flue gas (wet basis) and how this value was applied to calculate the flue gas exit velocity. Furthermore, the report should discuss how potential changes to stack parameters, including flue gas flow rate, will be managed to ensure accurate modelling and compliance with air quality objectives.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which provides a response to this item. Specifically, the memorandum demonstrates how the flow rate has been determined and outlines why assumptions are conservative and appropriate.

Item 18 – Accuracy of NH₃ predictions

The ammonia (NH₃) emissions were modelled using the daily average emission limit from WI BREF 2019, as there are no short-term air emission limits for NH₃ in the European Union Industrial Emission Directives (EU IED) 2010. However, NH₃ has a 1-hour average air quality criterion, and it is unclear how accurately the 1-hour average ground-level concentrations (GLC) of NH₃ can be predicted using a 24-hour average emission rate.

The proponent is requested to submit a revised AQA report with a detailed explanation of why the predictions of 1-hour average NH₃ ground level concentrations were based on a 24-hour emission rate, as well as the accuracy of this assumption on the assessment of potential impacts.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which provides a response to this item and outlines the rationale supporting the adopted methodology and approach.

Item 19 – Discrepancy in predicted maximum SO₂ concentrations

The AQA report presents predicted maximum SO₂ 1-hour concentrations at the commercial receptor for LP2 under both daily average in isolation and isolation + background scenarios (36.1 µg/m³ and 164.4 µg/m³ respectively, as demonstrated in Table 29 and Table 30). The SO₂ emissions from the short-term average are significantly higher than the daily average. However, the predicted maximum SO₂ 1-hour concentration in isolation + background for the LP2 daily average (164.4 µg/m³, Table 30) is nearly identical to the LP2 short-term average SO₂ 1-hour concentration (164.5 µg/m³, Table 34).

The proponent is requested to submit a revised AQA report with a detailed explanation of the modelling approach, including any assumptions or limitations. Provide an explanation of why the predicted maximum SO₂ 1-hour concentrations in isolation + background at the commercial receptor from LP2 average (Table 30) is approximately the same as LP2 short-term average SO₂ 1-hour concentration (Table 34) and confirm the accuracy of the reported results.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which provides a detailed response to this item, and notes that additional text has been added to Section 7.1.2 of the **Air Quality Technical Report (Revision D)** to further explain this matter.

Item 20 – Correction of PM_{2.5} annual average objective

The PM_{2.5} annual average air quality objective in Table 30 of the AQA report is incorrectly listed as 8 µg/m³. The correct value is 7 µg/m³.

The proponent is requested to submit a revised AQA report with this error corrected.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which confirms that Table 30 of the updated **Air Quality Technical Report (Revision D)** has been revised to correct the value to 7 µg/m³.

Item 21 – Provision of PM_{2.5} and PM₁₀ concentrations based on LP1 and LP2 short-term emissions

The AQA report indicates that the maximum PM_{2.5} annual average ground-level concentration from the project, including cumulative background, is 95% of the relevant air quality objective at sensitive receptors when based on LP1 daily average (upper) emission concentration limits (Section 7.1.2.1). For the same scenario, the predicted PM₁₀ annual average concentration at a commercial receptor with cumulative background is 67% of the relevant objective. This shows PM_{2.5} is the most critical contaminant. However, the report does not present the maximum predicted PM₁₀ and PM_{2.5} 24-hour and annual average concentrations based on LP1 short-term emissions (Section 7.1.2.2).

Similarly, the AQA report does not include the maximum predicted PM_{2.5} and PM₁₀ 24-hour and annual average ground-level concentrations based on LP2 short-term emissions (Section 7.1.2.5).

The proponent is requested to submit a revised AQA report with the maximum predicted PM_{2.5} and PM₁₀ 24-hour and annual average ground-level concentrations based short-term emissions being adopted for both LP1 and LP2.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which provides a response to this item and outlines the rationale supporting the referenced scenarios. Section 7.1.2 of the updated **Air Quality Technical Report (Revision D)** has been updated to include this information.

Item 22 – Percentage compliance with air quality objectives

In Section 7.1.2.1 and Section 7.1.2.4 of the AQA report, the maximum NO₂, SO₂, PM₁₀, and PM_{2.5} concentration modelling results for LP1 and LP2 are presented as dot points, indicating percentage compliance with the relevant air quality objectives. However, it is unclear whether these percentage compliance values correspond to the 1-hour, 24-hour, or annual air quality criteria.

The proponent is requested to submit a revised AQA report that explicitly specifies whether the percentage compliance values for NO₂, SO₂, PM₁₀, and PM_{2.5} concentrations in Sections 7.1.2.1 and 7.1.2.4 represent 1-hour, 24-hour, or annual air quality criteria.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which confirms Sections 7.1.2.1 and Section 7.1.2.4 of the updated **Air Quality Technical Report (Revision D)** have been updated to specify which averaging periods the percentage compliance values represent.

Item 23 – Percent compliance values for different contaminants

The Executive Summary and Section 11 (Conclusion) of the AQA report state that the modelling results of Project operation phase identified the following in the air quality assessment:

- Project operating at the LP1 daily average (upper) emission limits scenario, the maximum ground-level concentrations due to the Project with cumulative background do not exceed 95% of the relevant objectives.
- The Project operating at the short-term emission limits scenario, the maximum ground-level concentrations due to the Project with cumulative background do not exceed 76% of the relevant objectives.

These statements are unclear because they do not specify that the percentile compliance values refer to different contaminants (i.e. PM_{2.5} in the first case and SO₂ in the second case). The PM_{2.5} concentration in the second case would not be less than 95% of the relevant objective.

The proponent is requested to submit a revised AQA report clarifying the percentage compliance values in the two scenarios referring to different contaminants.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which confirms the Executive Summary and Section 11 of the updated **Air Quality Technical Report (Revision D)** have been updated to present the percentage compliance values in the two scenarios referring to different contaminants.

Item 24 – Missing scenario 4 modelling

Section 4.4.5 of the HHRA report submitted as part of the application material (indicates that the risk assessment is based on three scenarios of the AQA report. These scenarios are:

- Scenario 1 - Load Point 1 (LP1) based on daily average compliance operations: This assessment includes pollutants emissions based on the WI BREF 2019 BREF WI, 2019 - daily average (upper) concentration limits.
- Scenario 2 - Load Point 1 (LP1) based on short-term compliance operations: This assessment includes pollutants mass emissions based on the EU IED 2010 - short-term (30-minute average) concentration limits. For this scenario, it was assumed that one line will be operating at short-term emission limits whilst the other line will be operating at the daily average (upper) concentration limit.
- Scenario 3 - Load Point 2 (LP2) based on daily average compliance operations: This assessment includes pollutants mass emissions based on the WI BREF 2019 BREF WI, 2019 - daily average and (upper) concentration limits and assuming a maximum waste throughput load of 120%.

Please note, the HHRA is missing Scenario 4 which is based on LP2 emissions considering the EU IED 2010 - short-term non-routine operation and assuming a maximum waste throughput load of 120%. Air emissions in Scenario 4 are greater than the Scenario 2. Therefore, health risk based on Scenario 2 does not represent the worst-case conditions.

The proponent is requested to submit a revised HHRA report with Scenario 4 included in the risk assessment.

Response

Please refer to the **Human Health Technical Memorandum** which provides a response to this matter and confirms the **Human Health Risk Assessment (Revision E)** prepared by EnRisks has been updated to include Scenario 4.

Item 25 – Operational worst case scenario (with both flues in operation)

A short term variation in emissions is expected due to variability in mixed waste feedstock composition and/or combustion characteristics and some process upsets and non-routine operations. The Scenario 3 and Scenario 4 models are based on LP2 assuming a maximum waste throughput at 120% mechanical load for daily average and short-term average compliance operations. When both flues are operating at short-term limits, the mass emissions of air pollutants are significantly greater than the daily average limits.

The proponent is requested to submit a revised HHRA report that incorporates an analysis of the operational worst-case scenario in which both flues are operating at short-term emission limits.

Response

Please refer to the **Human Health Technical Memorandum** prepared by EnRisks which cross references the **Air Quality Assessment Technical Memorandum** prepared by Katestone, and specifically the response to Item 14 of the Information Request regarding the consideration and determination of worst-case scenarios.

Item 26– Operational worst-case scenario (both lines operating at short-term limits)

In the AQA report, in both Scenario 2 and Scenario 4, mass emissions were modelled based on the assumption that one line operates at short-term emission limits while the other operates at daily average limits. This approach does not represent a worst-case scenario. Emissions are significantly higher when both lines (including associated flues) operate at short-term limits compared to situations where only one line is subject to short-term emission limits and the other to daily average limits. Under non-routine conditions, there is a potential for both lines to operate concurrently at short-term emission limits.

The proponent is requested to submit a revised HHRA report, incorporating an analysis of the worst-case impact health risk assessment based on mass emissions when both lines (including associated flues) operate at short-term limits.

Response

As above, please refer to the **Human Health Technical Memorandum** prepared by EnRisks which cross references the **Air Quality Assessment Technical Memorandum** prepared by Katestone, and specifically the response to Item 14 of the Information Request regarding the consideration and determination of worst-case scenarios.

Item 27– Modelled mass emission rates and final design

The modelled mass emission rates were determined by multiplying the specified pollutant concentration limits by the flue gas volume flow rate. It is recognised that the project design has not yet been finalised. Consequently, stack parameters may be subject to modification following the selection of the moving grate technology provider and the completion of the detailed project design.

The proponent is requested to submit a revised HHRA report, incorporating a discussion on potential impacts the final design may have on the modelled GLCs and health risk assessment.

Response

Please refer to the **Human Health Technical Memorandum** prepared by EnRisks which cross references the **Air Quality Assessment Technical Memorandum** prepared by Katestone, and specifically the response to Items 15 and 17 of the Information Request regarding possible changes due to technology provider selection and detailed design in relation to establishing mass emission rates.

Item 28 – Health risk assessment for criteria pollutants

Section 5.4.1 of the HHRA report addresses the estimation of health risks associated with criteria pollutants, including PM₁₀, PM_{2.5}, NO₂, SO₂, and CO. The assessment considered incremental changes in modelled ground level concentrations (GLCs) resulting from the proposed facility under the LP1 scenario (Load Point 1 – daily average compliance operations), as well as cumulative GLCs combining both the facility's contributions and existing ambient background levels. Modelling outcomes based on LP1 daily average emissions were compared against air quality objectives for 1-hour, 24-hour, and annual averaging periods.

It should be noted that daily average mass emission values are considerably lower than short-term (30-minute average) emission values. Consequently, modelled GLCs derived from the LP1 daily average emission scenario are significantly less than those from the LP1 short-term (30-minute average) emission scenario. As such, modelling results based on

daily average emissions are not adequate for assessing risk relative to criteria pollutants with 1-hour average ambient air quality standards. The rationale for not utilising modelling results from short-term (30-minute average) emission scenarios for LP1 and LP2 when evaluating 1-hour average air quality objectives remains unclear.

The proponent is requested to submit a revised HHRA report that includes a discussion of the health risk assessment for criteria pollutants against 1-hour average air quality objectives, based on short-term (30-minute average) emission scenarios.

Response

Please refer to the **Human Health Technical Memorandum** which provides a response to this matter and confirms that Section 5.4 of the **Human Health Risk Assessment (Revision E)** prepared by EnRisks has been updated to include a discussion of the health risk assessment for criteria pollutants against 1-hour average air quality objectives.

Item 29 – Section 5.4.2 of HHRA report

Section 5.4.2 of the HHRA report states that at the time of preparing this HHRA report (i.e. 17 February 2026) the Queensland Environmental Protection (Air) Policy 2019 ambient air quality (AAQ) objectives are not updated as the values in National Environment Protection (Ambient Air Quality) Measure (AAQ NEPM) (2021). On 1 December 2025, the Environmental Protection (Air) Policy 2019 AAQ objectives were amended to align with the AAQ NEPM standards of 2021.

The proponent is requested to submit a revised HHRA report and update information in Section 5.4.2.

Response

Please refer to the **Human Health Technical Memorandum** which provides a response to this matter and confirms that Section 5.4.2 of the **Human Health Risk Assessment (Revision E)** prepared by EnRisks has been reviewed and updated to reflect the current AAQ objectives under the Environmental Protection (Air) Policy 2019 as amended.

Item 30 – Table 5.1 and 5.2

Table 5.1 of the HHRA report presents the sulfur dioxide (SO₂) AAQ objectives, as outlined in the Queensland EPP (Air) 2019 publication. Effective from 1 December 2025, the AAQ objectives within the EPP (Air) 2019 were amended to align with the standards established in the AAQ NEPM (2021) (refer to item 18 above for further information). The SO₂ air quality objectives listed in the current EPP (Air) have been substantially reduced, with the 1-hour average decreasing from 570 µg/m³ to 214 µg/m³, and the 24-hour average from 229 µg/m³ to 57 µg/m³. Notably, Table 5.1 does not provide the percentage contribution of “project + background” relative to the AAQ objectives for the various land uses.

Similarly, Table 5.2 of the HHRA report details the nitrogen dioxide (NO₂) AAQ objectives based on the Queensland EPP (Air) 2019 publication, which were superseded on 1 December 2025 (refer to item 18 above). The NO₂ air quality objectives in the current EPP (Air) have been significantly reduced, with the 1-hour average lowered from 250 µg/m³ to 164 µg/m³, and the annual average from 62 µg/m³ to 31 µg/m³. Table 5.2 does not state the percentage contribution of “project + background” in relation to the AAQ objective for the relevant land uses.

The proponent is requested to submit a revised HHRA report with updated information in Table 5.1 and in Table 5.2, add the percentage contribution of “project + background” and update risk assessment conclusions if they change.

Response

Please refer to the **Human Health Technical Memorandum** which provides a response to this matter and outlines the specific amendments made to the updated **Human Health Risk Assessment** to incorporate the relevant matters raised.

Item 31 – Table 5.4

Table 5.4 of the HHRA report outlines the PM_{2.5} AAQ objectives as specified in the Queensland EPP (Air) 2019 publication. The annual average PM_{2.5} EPP (Air) AAQ objective has since been updated to reflect the amended standards to align with the AAQ NEPM (2021) standards. The current EPP (Air) sets the annual average PM_{2.5} AAQ objective at 7 µg/m³. The predicted maximum cumulative (project + background) annual average concentration of PM_{2.5} at residential and commercial receptors is 6.7 µg/m³, which represents approximately 96% of the relevant objectives. Table 5.4 does not provide the percentage contribution of “project + background” relative to AAQ objectives for the respective land uses.

Additionally, modelling results in Table 5.4 indicate that the predicted annual average maximum cumulative (project + background) concentration of PM_{2.5} at residential and commercial receptors is 6.7 µg/m³, based on the LP2 daily average emission limit scenario under normal operational conditions. These findings demonstrate that PM_{2.5} is the principal contaminant for impact assessment. There remains a risk that the cumulative annual average PM_{2.5} concentration at sensitive receptors may exceed the EPP (Air) objective of 7 µg/m³.

The proponent is requested to submit a revised HHRA report with updated information in Table 5.4 to include AAQ objectives, re-run the modelling of cumulative impact (project and background) and identify a worst-case scenario applicable to the health risk assessment of PM_{2.5}. This scenario must be discussed as it relates to health risk assessment.

Response

Please refer to the **Human Health Technical Memorandum** which provides a response to this matter and confirms that additional information has been added to Section 5.4.5 of the **Human Health Risk Assessment (Revision E)** prepared by EnRisks to address this matter.

Item 32 – Table 5.13

Table 5.13 of the HHRA report presents the chronic inhalation risks associated with threshold chemicals at residential receptors, based on modelled concentrations assessed under normal operating conditions (i.e., LP1). The methodology used to derive the exposure concentration, defined as the air concentration relevant to the exposure period as an annual average, is not clearly outlined. Additionally, the approach for selecting health-based criteria or tolerable concentration (TC) values for calculating risk quotients (RQs) for the identified pollutants requires further clarification.

Furthermore, Table 5.14 addresses non-threshold chronic risks for inhalation exposures within residential land use, detailing increased cancer risks calculated using adjusted exposure concentrations and inhalation unit risk values. However, the method for calculating these adjusted exposure concentrations is not specified.

The proponent is requested to submit a revised HHRA report that provides examples and demonstrates the calculation of RQs for threshold chemicals and non-threshold chemicals.

Response

Please refer to the **Human Health Technical Memorandum** prepared by EnRisks which provides a response to this item and addresses specific queries regarding the applied methods and calculations, and confirms that all of the calculations are provided in the spreadsheet images in Appendix D of the updated **Human Health Risk Assessment (Revision E)**.

Item 33 – Non-threshold chronic risks for inhalation exposures

Non-threshold chronic risks associated with inhalation exposures have been assessed for PAHs and benzene. The rationale for excluding other carcinogens, such as dioxins, formaldehyde, and heavy metals, from this evaluation is unclear. For compounds classified as human carcinogens, it is widely accepted that no exposure level can be deemed entirely safe; even minimal exposure may result in genetic alterations that elevate cancer risk.

The proponent is requested to submit a revised HHRA report to include additional carcinogens in the non-threshold pollutant's risk assessment.

Response

Please refer to the **Human Health Technical Memorandum** prepared by EnRisks which provides a detailed response to this matter.

Item 34 – Non-threshold risk assessment of As and Ni

For heavy metals such as arsenic (As) and nickel (Ni), which may contribute to cancer risk via inhalation or ingestion, the cancer risks based on the non-threshold approach have not been estimated. The risk assessment for arsenic and nickel was limited to the threshold approach. Arsenic is an established human carcinogen; however, there is ongoing debate regarding its classification as a genotoxic carcinogen. Some research indicates that arsenic is a potent genotoxic carcinogen capable of inducing DNA damage, including chromosomal breakage and numerical chromosomal alterations. A similar concern may apply to the assessment of carcinogenic effects stemming from nickel exposure. Consequently, there is a potential for the cancer risk associated with arsenic and nickel to be underestimated when employing the threshold methodology.

The proponent is requested to submit a revised HHRA report to include non-threshold risk assessment for exposure to arsenic (As) and nickel (Ni).

Response

Please refer to the **Human Health Technical Memorandum** prepared by EnRisks which provides a detailed response to this matter.

Item 35 – PFAS-type substances

Seqwater acknowledges the applicant's responses regarding limited emissions of perfluoroalkyl and polyfluoroalkyl substances (PFAS, as well as PFOS, PFOA, PFHxS, PFNA, and PFBA, referred to as 'PFAS-type substances' in this advice) and particulate pollution as a result of the development, noting these emissions are accurate and estimated to be small.

Despite this, Seqwater's concerns are focused the cumulative human health impact of these compounds on the safety of drinking water – both in terms of additionality of concentrations, the extended timeframes that need to be considered, and the scale of source catchments. Whilst it is acknowledged that these particulates are found in background levels in the surrounding environment, this does not justify further degradation as a result of the development. Whilst it is acknowledged that removal of PFAS-type substances to non-detectable limits by filtration systems for the smokestack may not be proposed due to difficulty or impossibility, deferring this difficulty further downstream to Seqwater's treatment responsibility is not reasonable, particularly considering:

- The criticality of drinking water and difficulty in removing these through existing treatment processes
- Technologies in the removal of PFAS-type substances from drinking water being relatively new and untested
- Cumulative contributions of PFAS-type substances and a need to proactively, rather than reactively protect water quality
- Recently revised limits for PFAS-type substances in the Australian Drinking Water Guidelines and limited certainty on whether existing treatment processes will be capable of meeting these long-term
- The expectation that future water treatment upgrade costs will be borne by Seqwater and customers.

While the proposed operation is not directly adjacent to source catchment waterways, the airborne emissions are dispersed and settle on catchment land over a long period of time then can be transported into waterways that provide water to our drinking Water Treatment Plants (WTPs). As the compounds are long lived and persistent, the cumulative impacts are considered a risk to these catchments. While the concentrations might be low, the contamination occurs continuously and over the long-term potentially resulting in chronic exposure to these particulates. Seqwater has

existing and future downstream WTPs that take raw water from the Logan River catchment and supply drinking water to the community everyday, which is an arrangement that must retain certain and safe for the foreseeable future.

Both the HHRA Report and the Planning Report assert that the quantity of PFAS will decrease within residual waste to be used as fuel for the facility, however, do not provide justification for this assertion. As reported by the Federal Government in a report for the Department of Climate Change, Energy the Environment and Water titled: Hazardous Waste in Australia 2025 (Appendix A), reported PFAS-contaminated waste has risen from near-zero to over 100,000 tonnes in the last eight years. The report specifies that this trend is most clear in Victoria and Queensland which are states that house most of the infrastructure for managing PFAS waste nationally. The report denoted that PFAS waste arisings are likely to be underestimated.

The Parliamentary Inquiry into the extent, regulation and management of PFAS investigated the impacts of PFAS in Australia, including within waste streams from households and other uses. The committee noted compelling evidence that costs associated with PFAS removal and wastewater treatment are much greater than the costs required to produce PFAS chemicals and the products that contain them. Accordingly, the monitoring and control of PFAS in waste is paramount, considering the cumulative impacts on our catchments. Recommendations from the report include requirements for legacy PFAS contamination within waste streams to be reduced, however given the findings of Appendix A and the substantial increases in PFAS in waste streams, this will remain an ongoing issue.

Being responsible for providing safe and reliable drinking water, Seqwater is under increasing pressure regarding the monitoring and treatment of PFAS-type substances in both raw and treated drinking water supplies. There are a number of risks associated with these increases including population health, reputational risks and increased cost to the consumer of managing the risk through water treatment plant upgrades. Accordingly, Seqwater maintains significant concerns with regard to the emerging and potential cumulative impacts that PFAS-type substances will have on the surrounding catchment in terms of drinking water quality.

The proponent is requested to submit an amended Human Health Risk Assessment Report including:

- Consideration of the above discussion, including Hazardous Waste in Australia 2025 report
- Amended assumptions regarding the quantity of PFAS expected in residual waste over the life of the Development
- Amend the resulting data based on the above
- Assumptions for all per- and poly- fluoroalkyl substances which have a health-based guideline value included in the Australian Drinking Water Guidelines (version 4, 2025), including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS) and perfluorobutane sulfonic acid (PFBS)

Integrate additional measures that reduce PFAS, PFOS, PFHxS and PFBS in runoff leaving the site (at all discharge points) to the equivalent health-based limits prescribed in the ADWG (Table 10.6, page 221) – e.g. improved carbon or other filtration/capture/treatment technology for the emissions stack, as well as methods within the cycle of waste processing proposed at the site, including stormwater management, transport, incineration, removal and storage of materials - or provide further justification and reasoning as to the proposed location of a facility producing and discharging these contaminants within a drinking water catchment. Any international examples and case-studies sought to be used must be within a drinking water catchment for relevance.

Response

Please refer to the **Technical Note (Item 35)** prepared by Cleanaway which provides a detailed response to this matter. The **Human Health Risk Assessment (Revision E)** has been reviewed and updated in response to the matters.

The response includes inter alia:

- Detailed analysis of PFAS pathway through the facility.
- Discussion regarding stack emissions, international literature review and adopted assumptions for BERC
- Summary of assessment in respect of the Seqwater catchment, Logan River and Wyaralong Dam and details around deposition to soil.

Item 36 – Volatile Organic Compounds

The AQA and HHRA uses formaldehyde and benzene as the benchmark for all VOCs, complying with relevant health guideline levels (for example, the air pollution assessment criteria highlighted in the Victorian EPA - Guideline for assessing and minimising air pollution in Victoria). This may not be accurate, and further assessment is needed to determine the levels of other VOCs (for example, acrolein and acetone) that may be released.

The proponent is requested to submit a revised air quality assessment and human health risk assessment, including assessment against all other VOCs that will be released through emissions. If any VOCs are found to be released beyond the health investigation guideline levels, provide mitigation measures to ensure that they will be released at levels in line with relevant health guidelines.

Response

Please refer to the **Human Health Technical Memorandum** prepared by EnRisks which provides a detailed and comprehensive response regarding the identification, consideration and assessment of VOCs. Based on the detailed analysis provided, the response states the adopted approach and provides an additional review of acrolein and acetone.

Item 37 – Scope 1 emission factors and inventory

The GHGA submitted as part of the application material (reference D24577-4, Rev C) applied method 1, as outlined in Part 5.5 (Waste incineration) of the NGER (Measurement) Determination and Table 28 of the 2025 Australian National Greenhouse Accounts Factors, to derive a CO₂ emission factor based on waste composition characteristics (Appendices A and B of Greenhouse Gas Assessment). It is noted that this method does not apply to incineration for energy production (see Section 5.51 of the NGER (Measurement) Determination). Method 1 or 2 in Part 2.2 should be adopted for this estimation. Nevertheless, for assessment of this application, the chosen method is accepted.

Methane and nitrous oxide (N₂O) emissions from incineration were not considered. Emission factors of 1.8 kg-CO₂-e/GJ (i.e., items 9 and 14 of Part 1 of Scheme 1 of the NGER (Measurement) Determination) should be applied. Energy contents of 12.2 and 15.7 GJ/t as described in the Waste Feedstock Report can be used as estimates for municipal solid waste (MSW) and commercial and industrial (C&I) residual waste, respectively. Inclusion of these factors would result in an additional 18,126 t CO₂-e of Scope 1 emissions. In Table 8, the 2025-30 period is included in the calculation for the operational phase, which is unlikely given the 39-month construction period.

Scope 1 emissions from urea consumption in the Selective Non-Catalytic Reduction (SNCR) process must be considered for two reasons:

- 1) CO₂ is directly released during urea decomposition (0.733 t CO₂-e/t urea, 1,128 t CO₂-e in total)
- 2) N₂O is generated as a by-product.

For example, assuming 10% NO_x is converted into N₂O (see BAT reference document for Waste Incineration, 150 t N₂O may be generated, resulting in Scope 1 emissions of 39,750 t CO₂-e. These emissions vary depending on operational parameters and process optimisation conditions. Using ammonia instead of urea in the SNCR process and significantly reduce these N₂O emissions. It is noted that all reference facilities in the Technical Process Description use ammonia solutions.

The proponent is requested to submit a revised GHGA including:

- 1) Review and include emission factors for methane and nitrous oxide emissions from waste incineration in Table 7.
- 2) Review and update the Scope 1 emissions associated with urea use in the SNCR process.
- 3) Provide justification for the use of urea instead of ammonia in the SNCR process.
- 4) Update the Scope 1 emission factors/inventory to reflect any changes.
- 5) Remove the calculations for the 2025-30 period.

Response

Please refer to the **Greenhouse Gas Assessment Technical Memorandum** which outlines the additional information and assessment which has been undertaken and incorporated in the updated **Greenhouse Gas Assessment (Revision D)** prepared by Katestone.

Item 38 – Biodiesel usage

Section 5.2 of the GHGA states that biodiesel would be used for boilers only; however, Table 10 applies total diesel emissions (i.e. 3,841 t CO₂-e) from stationary diesel consumption, including emissions from both machinery and generator (890 t CO₂-e) and boilers (2,951 t CO₂-e). Diesel usage for the boilers can be inferred from Table 8 (2951/0.0702=42,037 GJ). Therefore, emissions from biodiesel would be 42,307*0.028=1,177 t CO₂-e, rather than 901 t CO₂-e as presented in Table 10. The emissions reduction from using biodiesel is 1,774 t CO₂-e.

The proponent is requested to submit a revised GHGA having reviewed and clarified the applicability of biodiesel use and updated relevant results.

Response

Please refer to the **Greenhouse Gas Assessment Technical Memorandum** which confirms the emissions reductions attributable to biodiesel use for boiler black starts have been clarified in Table 11 and Section 5.2.2, demonstrating a potential saving of 2,940 t CO₂-e. Please refer to the updated **Greenhouse Gas Assessment (Revision D)** prepared by Katestone for further details.

Item 39 – Scope 3 emission factors and inventory

In Table 7 of the GHGA report, a Scope 3 emission factor of 17.3 kg CO₂-e/GJ for Diesel (Stationary) should be included. In Table 11, calculations for Category 3 (diesel) appear incorrect. Taking BC for example, Scope 3 emissions from diesel should be (1,595+1,417+90)*38.6*0.0173=2,071 t CO₂-e rather than 1,954 t CO₂-e as presented.

The Scope 3 emission factor of 105 kg CO₂-e/t for bottom ash cannot be verified and appears high, resulting in an overestimation of the avoided emissions from recycling bottom ash. For comparison, fly ash has an emission factor of 14.5 kg CO₂-e/t as per the AusLCI database.

The Scope 3 emission factor of 320 kg CO₂-e/t for urea appears low, as it can be as high as 1,500 kg CO₂-e/t (see AusLCI database). As a result, the Scope 3 emissions are underestimated. The Scope 3 emission factor of 790 kg CO₂-e/t for quicklime is underestimated, as it only accounts for process emissions (i.e., decomposition of calcium carbonate), and excludes emissions from fossil fuel combustion. For example, 1,150-1,400 kg CO₂-e/t have been reported by Adbri (see Table 7).

The proponent is requested to submit a revised GHGA with updated Scope 3 emission factors and inventory.

Response

Please refer to the **Greenhouse Gas Assessment Technical Memorandum** which confirms how the report and assessment has been updated to address the matters raised. Please refer to the updated **Greenhouse Gas Assessment (Revision D)** prepared by Katestone for further details.

Item 40 – Avoided emissions

Table 7 of the GHGA presents Scope 1 emission factors for landfill; however, it is unclear how the Scope 1 emission factors were derived. It also appears that these factors were not used in the calculations in Section 4.4.2. Furthermore, the equation used to estimate landfill emissions is incorrect. As shown in the Table below, an emission factor of 1.62 t CO₂-e/t waste can be derived based on the waste composition and Table 15 of the Australian National Greenhouse Gas Accounts Factors for the 2030-50 period. The GWP term should be removed, as it is already embedded in the emission factors. A GWP of 28 (not 27) should be applied for methane where relevant. Moreover, captured landfill gas may also be used for electricity generation, reducing the net GHG benefit attributed to the project.

Emission factor (t CO ₂ -e/t waste)	1.62
Avoid emissions from landfill (AE, t CO ₂ -e)	$1.62 \times 760,000 \times 0.25 = 307,800 \text{ t CO}_2\text{-e}$
Potential electricity generation from landfill (MWh)	$1.62 \times 760,000 \times 0.75 / 28 \times 50 \times 0.35 / 3.6 = 160,312 \text{ MWh}$ (methane LHV: 50GJ/t, engine efficiency of 35%)
Emissions from electricity displacement	$160,312 \times 0.19 = 30,459 \text{ t CO}_2\text{-e}$

In Section 4.43, the avoided emissions from electricity displacement were calculated using coal-fired power stations as the benchmark, which significantly overestimates the emissions reductions. Grid emission intensity should be applied to reflect the ongoing decarbonisation of the grid. Using a projected average grid emission intensity of 0.19 t CO₂-e/MWh for 2030–2034 (see Appendix D of Australia's Emissions Projections 2025 by DCCEEW (<https://www.dcceew.gov.au/climate-change/publications/australias-emissions-projections-2025>)), the average annual emissions reduction is estimated to be 14,645 t CO₂-e (calculated as $(307,800 - 160,312 \times 0.19) - (369,489 + 2,951 - 577,600 \times 0.19)$). This only accounts for avoided methane emissions and electricity displacement compared to landfill. This value is significantly lower than that presented in Table 12.

The data in Table 13 appears reasonable; however, it cannot be verified without detailed activity data. For Example, Table 3 of Appendix E (Technical Process Description report) shows that the recovered ferrous and non-ferrous metals are 12,000 and 4,700 tpa, respectively, corresponding to avoided Scope 3 emissions of 20,400 and 79,900 t CO₂-e/y.

To better assess the project's GHG impact, net emissions should be provided and can be benchmarked against a landfill scenario. At a minimum, it should include both avoided emissions and Scope 3 emissions associated with consumption of quicklime, activated carbon, urea, and cement. Table 12 currently lacks a direct comparison with landfill operations, which is necessary given the project's significant Scope 1 and 3 emissions.

The proponent is requested to submit a revised GHGA including:

- 1) Review and update relevant assumptions and calculations for avoided emissions. Electricity generation from landfill gas and grid decarbonisation should be considered.
- 2) Provide detailed activity data for recyclable materials.
- 3) Provide net GHG emissions of the project relative to a landfill. This analysis must account for both avoided emissions and the project's Scope 3 emissions stemming from the pollutant control process.

Response

Please refer to the **Greenhouse Gas Assessment Technical Memorandum** which confirms how the report and assessment has been updated to address the matters raised. Please refer to the updated **Greenhouse Gas Assessment (Revision D)** prepared by Katestone for further details.

Item 41 – Risks and likely magnitude

Table 16 of the GHGA presents the project's emissions contribution to Queensland, Australian and global carbon budgets. The reported percentages appear incorrect and should be 0.607% and 0.141% of the remaining Queensland and national carbon budgets, respectively. Additionally, the document does not clearly define the assumptions or references used to estimate these carbon budgets. For example, our internal analysis indicates a national carbon budget of 4,893-5,382 Mt CO₂-e for the 2025-2050 period, assuming a linear emissions reduction trajectory aligned with the 2030 and 2035 NDC targets. These budgets would be even lower given the project is not expected to begin operation until 2030.

The proponent is requested to submit a revised GHGA including:

- 1) Review carbon budget calculations and provide supporting assumptions and references.
- 2) Use 2030-2050 carbon budgets as reference points considering most emissions occur during the operational phase.

Response

Please refer to the **Greenhouse Gas Assessment Technical Memorandum** which confirms how the report and assessment has been updated to address the matters raised. Please refer to the updated **Greenhouse Gas Assessment (Revision D)** prepared by Katestone for further details.

Item 42 – Process for removing hazardous waste

The waste feedstock report (reference BERC-ARU-BNE-SYWP-RPT-0002, revision C) and resource and waste management technical report (reference BERC-ARU-BNE-WEWM-RPT-0001, revision C) submitted as part of the application material contain criteria for acceptable waste feedstock. It has not, however, been documented how these criteria will be applied in practice to manage unacceptable waste appropriately. Documentation related to this process should demonstrate that hazardous waste will be appropriately separated from other acceptable waste.

The proponent is requested to submit a revised waste acceptance protocol and feedstock report including the process for separating waste types, including frequency of separation and controls used to ensure hazardous waste will be extracted

Response

Please refer to the **Technical Note (Items 42 & 43)** prepared by Ramboll which provides a detailed overview of the process and procedures underpinning the Waste Acceptance Protocol. In conclusion Ramboll notes the combination of contractual controls, pre-acceptance screening, inbound inspection, continuous visual monitoring within the bunker and quarantine procedures together help to ensure that hazardous waste is identified and removed prior to processing, and that compliant residual waste is combusted at the facility.

Item 43 – Combustion temperatures

The Technical Process Description submitted as part of the application material states that maintaining combustion at 850°C is sufficient to destroy potential hazardous components of the feedstock, such as persistent organic pollutants or PVC materials. This may not be accurate. The BATC (2019) European Standard, referred to in the proposal, indicates minimum temperatures of up to 1100°C may be required. Stockholm Convention 2008 Guidelines on best available techniques and provisional guidance on best environmental practices - Waste incinerators also indicate that 'grated' municipal solid waste incinerators should be maintained at 850°C to 950°C, or 1100°C to 1200°C if chlorine is present.

The proponent is requested to provide justification for the selection of the minimum combustion temperature, demonstrating adequacy of combustion and burnout of compounds that could have potential health impacts.

Response

Please refer to the **Technical Note (Items 42 & 43)** prepared by Ramboll which provides a detailed response to this matter, and concludes that on the basis the BERC will not be processing hazardous waste feedstocks, a minimum combustion temperature of 850°C is considered appropriate and consistent with regulatory requirements.

Additional Item (a)- DETSI email 2 June 2026

PFAS emissions were not modelled

EnRisks HHRA in Section 5.7 states that: "PFAS have been added to the air dispersion modelling undertaken for this Project in Katestone (2026). Data to allow this modelling was taken from studies in Sweden (Björklund 2024; Björklund, Weidemann & Jansson 2023, 2024). These studies evaluated the potential presence of PFAS in flue gas from an EfW facility in Sweden combusting municipal solid waste (60%) and industrial waste (40%)." Therefore, this implies that PFAS modelling may have been undertaken separately for HHRA after the AQA report was already submitted in February 2026.

The proponent is requested to submit an updated AQA report which includes the predicted impacts of PFAS emissions must be submitted as part of the official IR response.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which confirms that Appendix D Dispersion modelling of PFAS has been added to the updated **Air Quality Assessment (Revision D)**. This section details the emission rate of PFAS from the facility as well as the maximum predicted ground-level concentrations off site, at a commercial receptor, at a residential receptor and at the visitor centre.

Additional Item (b)- DETSI email 2 June 2026

Project emissions

Information Requested Project emissions Note 5 and 6 of Table 17 (Project Emissions) of the Katestone report states: IED 2010/75/EU Annex VI Part 6 Monitoring of Emissions clause 1.3. At the daily emission limit value level, the values of the 95 % confidence intervals of a single measured result shall not exceed the following percentages of the emission limits values:

<i>Emission</i>	<i>Units</i>
CO	10%
SO ₂ /NO _x	20%
Particulates/TOC	30%
HCl/HF	40%

The proponent is requested to provide detailed explanation how the percentage values listed in the table above were incorporated in the modelled emission rates (if any).

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which provides a detailed response to the matters raised and confirms how the percentage values listed in the table above were incorporated in the modelled emission rates, as applicable.

Additional Item (c)- DETSI email of 2 June 2026

Determination of daily average values from CEMS data for compliance

The proponent is requested to provide detailed explanation how the daily average values are to be determined from the CEMS data for compliance purposes.

Response

Please refer to the **Air Quality Assessment Technical Memorandum** prepared by Katestone which provides a detailed explanation how the daily average values are to be determined from the CEMS data for compliance purposes