



Environmental Aspects Management Plan – 366 Horton Road, Woottating

30 June 2021

Rev_4

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1 Context

1.1 Scope

This Environmental Aspects Management Plan (EAMP) has been updated with respect to rehabilitation and traffic management activities and measures for Capital's site located at 366 Horton Road, Woottating. The EAMP has been amended to include management of aspects for the application of an Extractive Industry Licence (EIL) for Stage 2 for the site.

The scope of this document is to outline proposed measures with respect to potential emissions and discharges identified from operational activities for the Shire of Northam EILs as well as the Department of Water and Environmental Regulation (DWER) Prescribed Premises licence for Category 12 (refer: L9251).

The EAMP draws on:

- Investigations, site assessments and background reports commissioned by Capital for the DWER Category 12 Prescribed Premises licence (L9251) and Stage 1 granted EIL by the Shire of Northam
- A desktop review and site visit undertaken by Encycle Consulting for the new Category 12 Prescribed Premises licence on Thursday, 20 August 2020 (L9251)
- A site visit with the Shire of Northam Department of Planning Manager and Officer, Capital Manager Director and Encycle to discuss site activities on Wednesday, 26 August 2020

1.2 Organisational Profile

Capital began operation in 1996 as a drainage and earthmoving operation. Capital Earthmoving & Drainage soon moved into demolition work and was renamed to Capital. From a number of years in this arena, the company was well positioned to recognise the significant amount of waste generated in the construction industry and the potential this waste had as a reusable commodity.

Capital focuses on efficient materials processing. The maintenance of a clean, safe and progressive work environment contributes to the company's reputation in the industrial waste reclamation industry.

Currently, a range of high quality, recycled products including crushed concrete road-base, track and drainage material and fill sand is produced. On the service side, Capital offers selected building waste facilities, on-site crushing and screening, building waste transportation and site remediation works.

1.3 Organisation and Site Contacts

David Markham, General Manager, Capital, Email: david@capitalperth.com.au,

Ray Gullotto, Managing Director, Capital, Email: ray@capitalperth.com.au

Phone: 08 9279 459

1.4 Site boundary and EIL Stages

The Stage 1 and 2 gravel extraction areas are shown in Figure 1 along with the DWER Prescribed Premises boundary, existing site infrastructure and location of the water course. The Stage 1 and Stage 2 activities are located at least 20 m within the Premises boundary and 40 m from the watercourse.

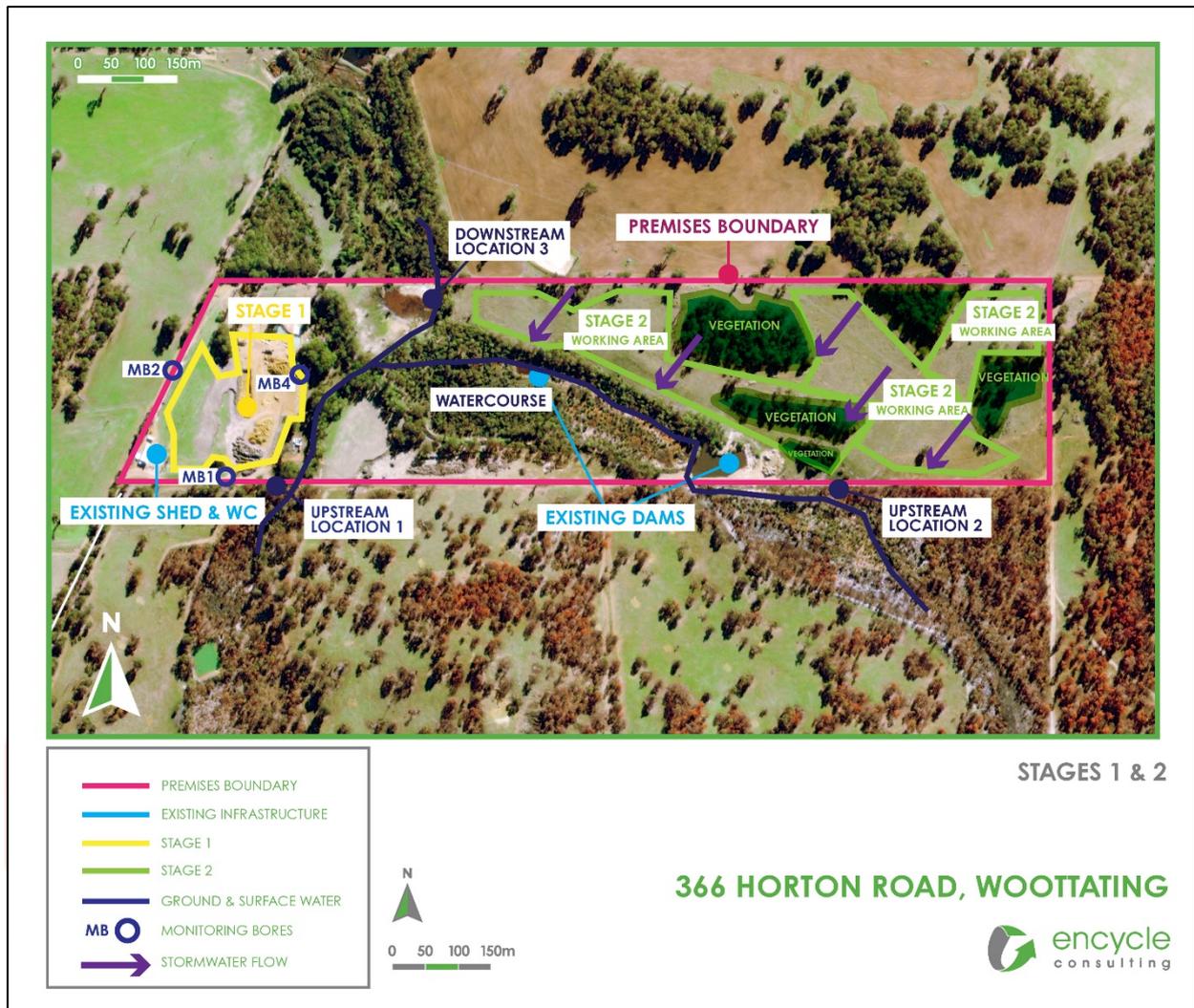


Figure 1: Premise's boundary and extraction areas

1.5 Hours of Operation

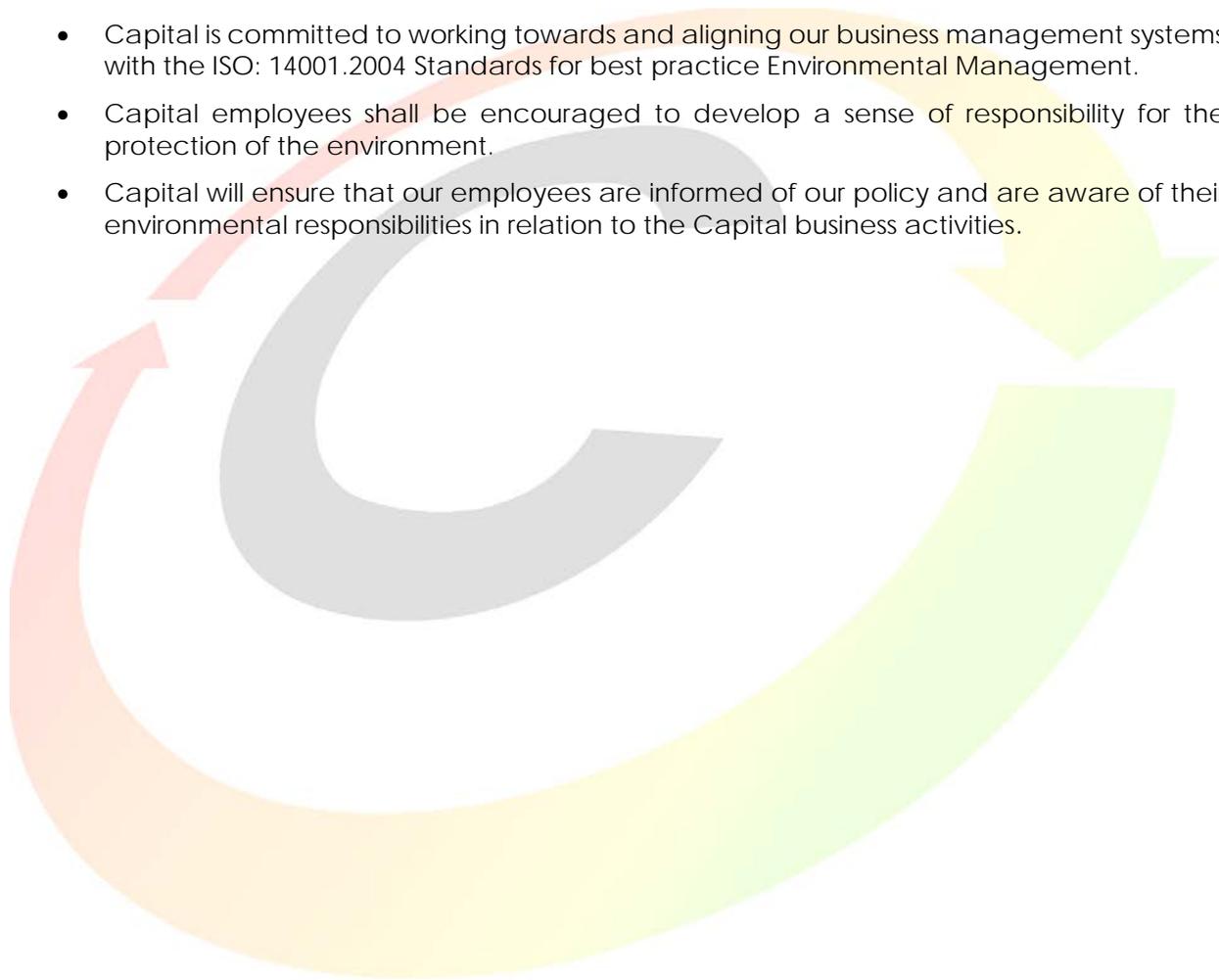
Operational hours will be from 7am to 7pm (in line with noise regulations)

2 Environmental Policy

Capital is committed to continuous improvement in our business operations in order to protect the environment, in accordance with the requirements of the law, our clients, and expectations of the general community.

In applying this Policy, Capital's activities shall be controlled by the following principles:

- Capital shall abide by all relevant laws, Acts, Regulations and Standards.
- Capital shall plan, develop, implement and monitor relevant procedures and standards to minimise any unfavourable environmental impact that may result from our business activities.
- Capital is committed to working towards and aligning our business management systems with the ISO: 14001.2004 Standards for best practice Environmental Management.
- Capital employees shall be encouraged to develop a sense of responsibility for the protection of the environment.
- Capital will ensure that our employees are informed of our policy and are aware of their environmental responsibilities in relation to the Capital business activities.



3 Overview of Site Characteristics

3.1 Location

The site is located on Lot M1822, 366 Horton Road, Woottating and located in the Shire of Northam (Figure 2). The Premises is approximately 55 kms east of Perth.

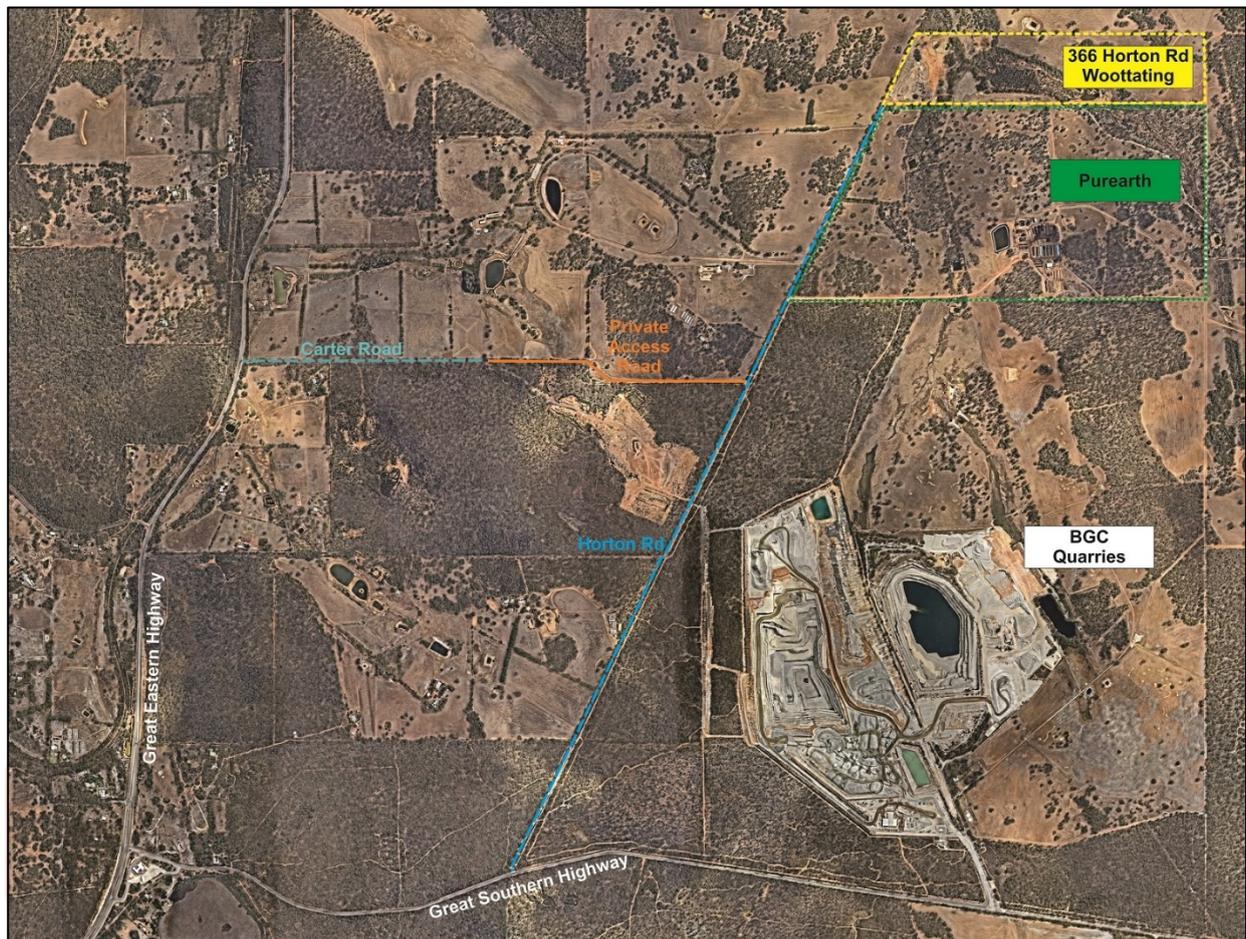


Figure 2: Site location map

3.2 Potential Receptors

The site is predominantly surrounded by rural properties used for cropping, sheep or cattle grazing with the closest sensitive residential receptors located at 830 m south west of the site.

The 'Guidance for Assessment of Environmental Factors: Separation Distances between Industrial and Sensitive Land Uses No.3' (EPA, 2005) has not yet been updated to reflect the Environmental Protection Authority's (EPA) revised policy framework. In the interim of content being update, Appendix A of this document states that buffer distances for "Extractive industries – no blasting conducted" is to be assessed on a case-by-case basis.

Impacts to potential receptors are expected to be mitigated as:

- The closest sensitive residential receptors is located more than 800 m from the south west boundary (with vegetation in between)
- Highly putrescible and potentially odorous waste are not being accepted to site

- Activities are related to EIL under the Shire of Northam
- Activities are not to be conducted within 20 m of the boundary (particularly the south-west boundary)
- The current DWER Category 12 licence and Stage 1 Shire of Northam EIL is to process up to 55,000 tonnes. Note that operations will be undertaken in a staged approach i.e. 55,000 tonnes will not be extracted in one year; thus mitigating potential environmental emissions generation
- Excavations of Stage 1 show that excavations can range from 1m, with limited excavations (to date) at 4m. Consequently, the 55,000 tonnes for Stage 1 is likely to be a maximum number and that amount is unlikely to be extracted. It is expected that excavations at Stage 2 will be similar in terms of geological profile
- It is proposed to conduct operations for the Stage 2 in a similar manner i.e. tonnes available for extraction will not be extracted in a single year but progressively over up to or between ten (10) and fifteen (15) years.

Table 1 below outlines potentially relevant land uses and environmental receptors in the vicinity of the Premises which may be receptors relevant to this licence application.

Table 1: Potential receptors to the Premises

Receptors	Description	Proximity to Premises
Sensitive residential receptors	Auburn Park Residences and rural property off Gt Eastern Hwy used for grazing and crops	Approx. 830 m south-west of the Premises boundary
	Residence on rural property at 598 Warlin Road	Approximately 2.5 km south-east of the Premises boundary
	Residence on rural property at 284 Warlin Road	Approximately 945 north-east of the Premises boundary
Industrial premises	Pure Earth Composting Facility. Composting facility licenced for Category 61 and 67A	Approximately 600 m south-east of the Premises boundary
	Voyager II Quarry (BGC)	Approximately 1100 m south-west of the Premises boundary
Watercourse	Minor non-perennial watercourse flowing northward through the Premises	Located within the Premises (east of Stage 1)
Groundwater	Present as a seasonal perched unit above the pallid clay zone of the laterite profile. The thickness of the perched aquifer, when present, is expected to range between <1 to 3 m	Depth to the regional groundwater table is approximately 20 – 25 mbgl.
DBCA managed land and waters	Keaginine Nature Reserve	Approximately 3.3 km north of the Premises boundary

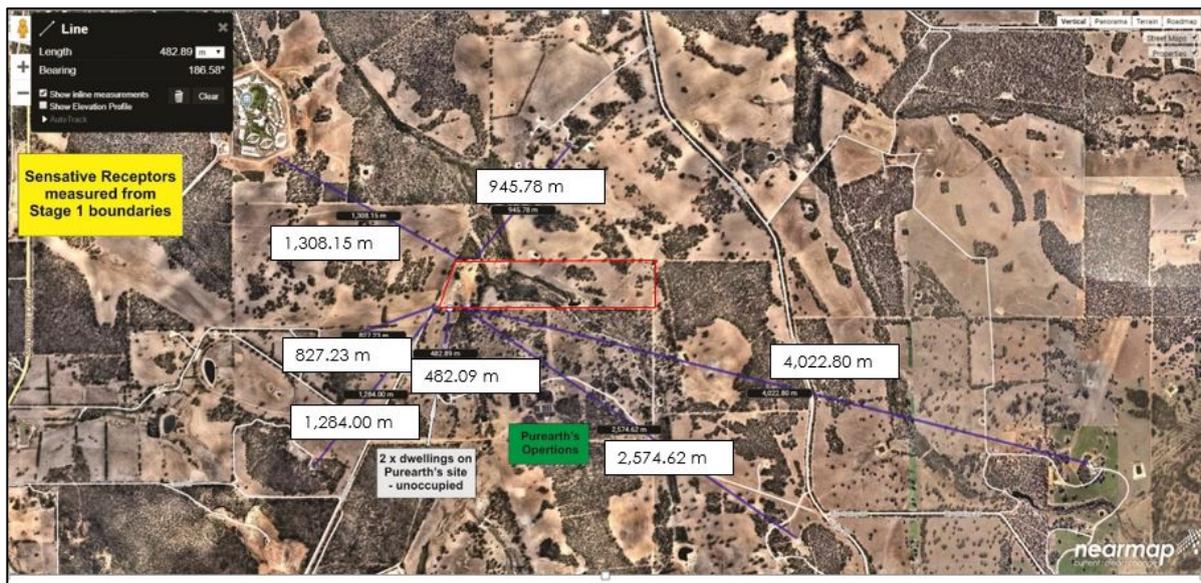


Figure 3: Proximity sensitive receptors (m)

3.3 Climatic Conditions

The climatic conditions have been reviewed based on the most recent data from the Bureau of Meteorology Bakers Hill weather station. Discussion with Capital General Manager from observation on site indicates that winds are predominantly east to south-east in the mornings switching to south-west in the afternoons. In cooler months, winds tend to come from westerly or northerly directions. The Bureau of Metrology (BoM) Bakers Hill station reports morning data, and Northam and York report on morning and afternoon/evening data. Figure 2 shows the mean 9am wind speed for the area with most recent data available from 1971 to 1985. The mean wind speed may reach strong wind conditions (22-27 knots on the Beaufort Scale¹) in January and February (when averaged). Average mean wind speeds for all other months record light or moderate wind conditions.

The mean rainfall, from data from years 1964 to 2019 is shown Figure 3. As expected, rainfall is higher over the months May to August with the highest levels being in July. Capital may not undertake excavation operational activities in June to August when rainfall is higher. Other operational activities could be undertaken, however, it is noted that in winter month screening can be impacted by wet conditions (e.g. screens 'clogging'). Consequently, it is likely that screening activity will be limited during winter months from an operational efficiency perspective.

¹ Beaufort wind scale, available: <http://www.bom.gov.au/marine/knowledge-centre/reference/wind.shtml>, accessed April 2020

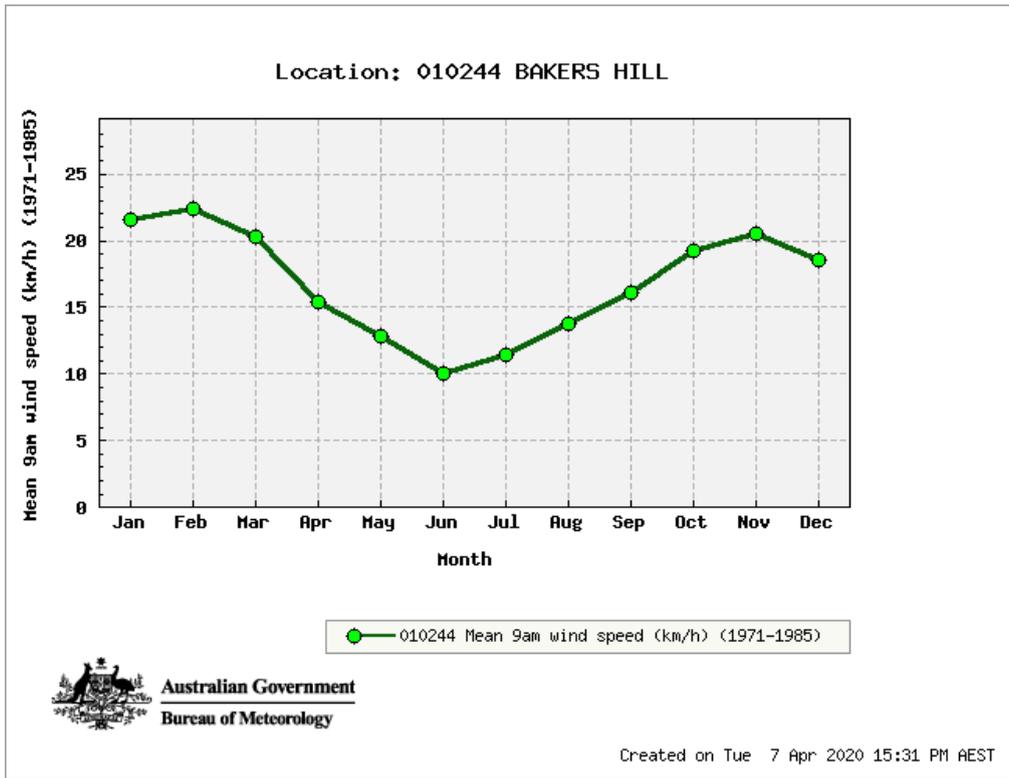


Figure 4: Average wind speed for site locality

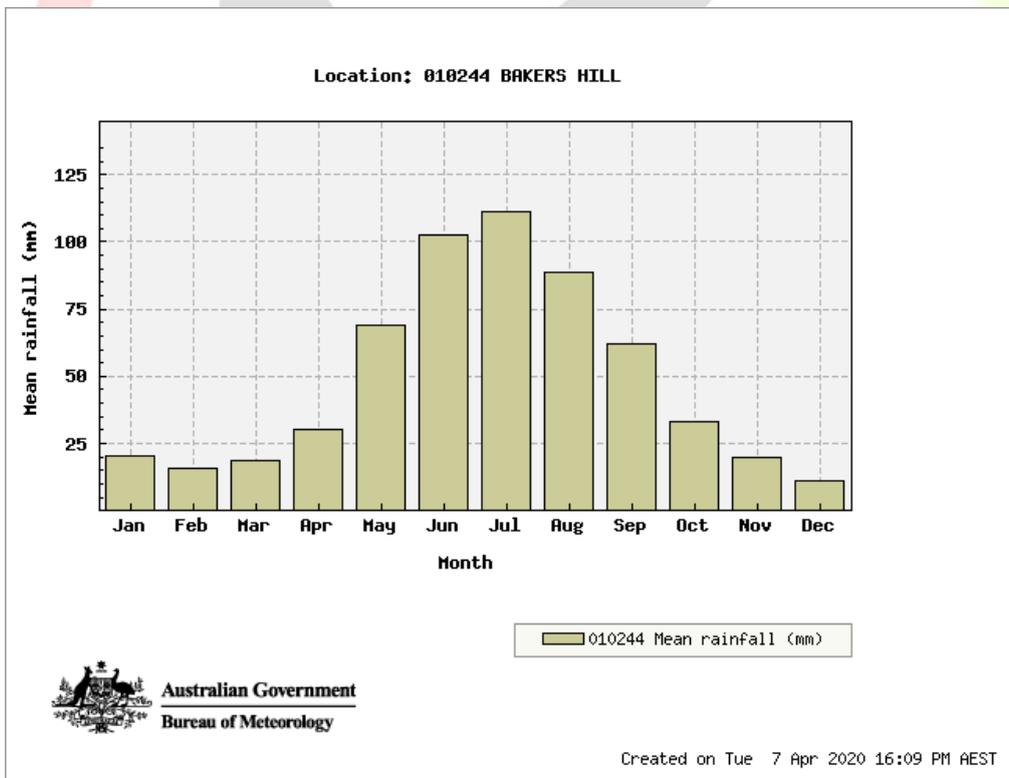


Figure 5: Average rainfall for site locality

3.4 Geology

The site is located on lateritic gravelly soils of the Darling Plateau. The geology of the area was mapped by Smurthwaite (1987) for the Geological Survey of Western Australia. The Lot is recorded as being underlain by granite and laterite deposit entering from the south west boundary.

The Lot is characterised by two geomorphological classifications, a narrow, shallow valley floor of fluvial origin and a surface of planation and lateritic uplands of denudational origins. (Reference: Gozzard, J.R., 1989. and Smurthwaite, A. J. 1987).

The Lot is raised at the west and east boundaries with a valley running approximately south to north through the lot 300 m away from the western boundary. The elevation of the south western and north western corners of the Lot are 290 m and 280 m Australian Height Datum (AHD) respectively. The south eastern and north eastern corners have elevations of 290 m and 305 m AHD respectively.

3.5 Hydrogeology

The lot consists of lateritic gravelly soils of the Darling Plateau. Underlying this layer is granite and laterite deposits. The site also contains a narrow shallow valley floor of fluvial origin and a surface of planation and lateritic uplands of denudational origins. The small creek bed contained within the lot is a minor non-perennial waterbody and is called Wooroloo Brook. There is evidence of perched water below the surface, and above the underlying granitic rock throughout the lot. The perched water table drains into the watercourse running through the lot.

The DWER Public drinking water source area mapping tool (PDWSA) was reviewed for the site to determine if the assessment undertaken in 2013 was still up to date. Accordingly, the site is not located within a public drinking water source and the nearest PDSWA is located over 3 kms to the south with P1 and P2 protection areas².

² PDSWA reviewed in: <https://www.water.wa.gov.au/maps-and-data/maps/public-drinking-water-source-area-mapping-tool>, accessed 07/04/20

4 Dust Management Plan

4.1 Potential impacts

Dust emissions can arise from the operational activities outlined in Figure 6.

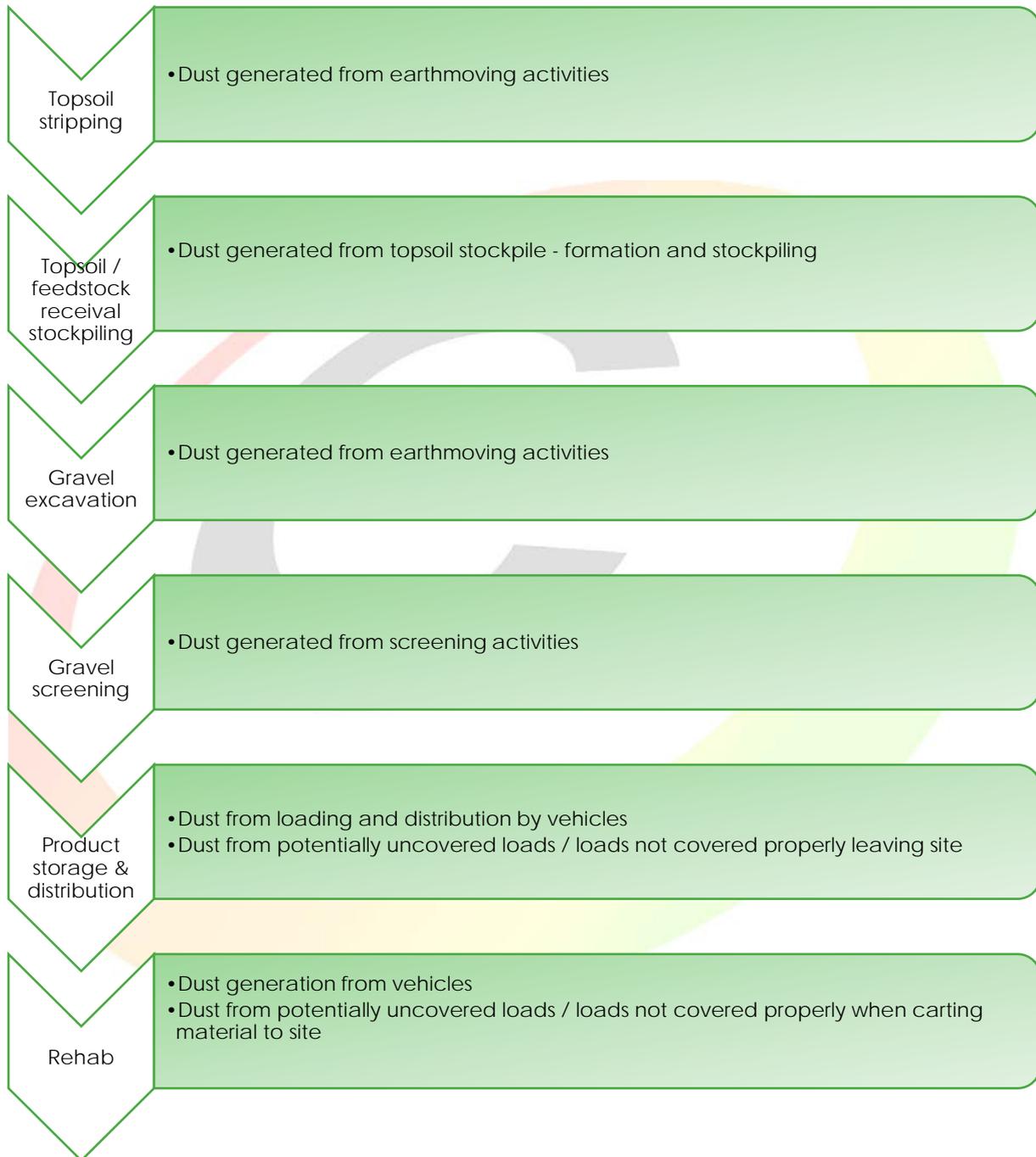


Figure 6: Activities producing dust emissions

The social impact on residential receptors is expected to be low given that the closest residence is 830 m from the Premises boundary. Operational activities for gravel extraction will be conducted on a campaign basis. Screening activities will not be undertaken in periods of strong winds (>25 knots) towards the direction of the closest receptor.

A campaign will usually run for 3 to 4 weeks for operational activities on site. There is potential dust impact for on-site operational staff and surrounding vegetation. Management of potential dust impacts will be implemented to mitigate:

- Risk to human health
- Reduced visual amenity
- Smothering of vegetation at the site
- Nuisance aspects

4.2 Risk Assessment

A review of the risk assessment of Category 12 and extraction activities was undertaken in accordance with 'A guideline for managing the impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities' (DEC, 2011)³ and changes to receptors in proximity to the Premises. Proximity to neighbouring residential receptors is outlined in section 3.2.

The Pure Earth Composting Facility located at approximately 600 m south of the Premises and has been developed since 2013. The risk assessment takes into account potential cumulative emissions from grinding / screening activities at this site. Note that the Pure Earth Composting Facility will most likely have submitted a Dust Management Plan to DWER for their licence application outlining management measures to mitigate offsite dust migration; reducing the potential impacts with cumulative emissions.

The risk assessment has been conducted on operational activities that could generate dust emissions and reviewed against the Guideline Addendum (DEC, 2011)⁴.

³ Available: https://www.der.wa.gov.au/images/documents/your-environment/air/publications/Guideline_for_managing_impacts_of_dust.pdf, accessed April 2020

⁴ Available: https://www.der.wa.gov.au/images/documents/your-environment/air/publications/Guideline_for_managing_impacts_of_dust.pdf, accessed April 2020

Table 2: Part A - Nature of the site

Item	Score		Assessment
	Option	Score	
1. Nuisance potential of soil when disturbed	Medium	4	<ul style="list-style-type: none"> - Stripping of sandy topsoil and potential for migration of dust particles - Excavation of gravel and potential for gravel and clay particles to become airborne and migrate beyond boundary - Layering of topsoil on surface and potential for dust migration from sandy soil particles - Stockpiling of feedstocks for soil processing activities - Soil blending and screening of soils - Stockpiling of gravel/soil products for distribution to markets (and occasional turning to continue to blend and prevent hydrophobic soil conditions) - Stockpiling of topsoil for rehabilitation purpose and potential for windblown particles - Stockpiling of soil for rehabilitation purposes - Infilling of excavated area with soil and potential for dust generation from soil particles
2. Topography and protection provided by undisturbed vegetation	Little screening	12	<ul style="list-style-type: none"> - Undulating site with patches of vegetation between the Premises and sensitive residential receptors (located at least 830 m away)
3. Area of site distributed by works	Between 1 and 5 ha	3	<ul style="list-style-type: none"> - Excavations will be on a progressive basis with rehabilitation activities occurring following excavation - For each stage, there will be excavation 'working areas' to minimise impacts - Where practicable, site works and any rehabilitation will occur progressively
4. Type of work being done	Bulk earthworks and deep trench	9	<ul style="list-style-type: none"> - Gravel extraction will occur at depths between 2 m and 4 m - Excavations of Stage 1 show that excavations can range from 1 m, with limited excavations (to date) at 4 m. It is expected that excavations at Stage 2 will be similar in terms of geological profile
Score total		28	

Table 3: Part B – Proximity of site to other land uses

Item	Score		Assessment
	Option	Score	
1. Distance to other land uses from site	Between 1 km and 500 m	6	<ul style="list-style-type: none"> - Closest residential receptor 830 m south-west of the Premises boundary - Pure Earth Composting Facility 600 m south-east of the Premises boundary
2. Effect of prevailing wind direction on other land uses	Isolated land uses affected by one wind direction	6	<ul style="list-style-type: none"> - Winds are predominantly east to south-east in the mornings switching to south-west in the afternoons. In cooler months, winds tend to come from westerly or northerly directions. Dust emissions will be mitigated by management practices and operational activities outlined below - Pure Earth Composting Facility is located approximately 600 m from the Premises boundary. Potential cumulative dust emission will be mitigated by management practices and operational activities outlined in section 4.4. It is assumed that Dust Management Plan and management actions are in place at Pure Earth - Staged and progressive 'working areas' will mitigate dust emissions from extraction
Total score		12	

The Premises risk assessment for operational activities generating dust is rated as 'Classification 2 – considered low risk'. The final Score (Part A x Part B) is 336. Dust management objectives and management of potential impacts have been drawn up for operational activities to mitigate any emission potential with this low risk classification.

4.3 Objectives

The objectives of the Dust Management Plan are to:

- Take all reasonable and practicable measures to ensure the prevention of dust from the Premises
- Comply with limits set by the National Environment Protection (Ambient Air Quality) Measure (NEPC, 1998)
- Ensure that nuisance dust levels and potential health hazards are not experienced by operational staff
- Ensure that nuisance dust levels and potential health hazards are not experience by neighbouring residential receptors

4.4 Management of potential dust emissions

To achieve the objectives, mitigation actions outlined below will be undertaken on a site wide basis. The following sub-section outlines mitigation activities to be undertaken for particular operational activities.

4.4.1 Site management

- Site personnel will undertake a site specific induction including use of Personal Protective Equipment (PPE) to prevent health hazards and exposure to dust emissions. Generally one or two Capital employees on site
- Where practicable topsoil stripping, gravel excavation, soil blending and rehabilitation activities will be undertaken in periods of calm or light winds to reduce dust migration
- The Site Supervisor will monitor wind conditions daily using weather app (e.g. Willy Weather) to assess wind strength and direction. In the event of strong winds (>25 Knots) and in particular in the direction of the closest sensitive receptor, scheduling of operations with reduced potential for dust generation will be assessed. The scheduling of operations may include measures to cease excavation and screening activities in the event of extreme adverse weather conditions
- Where practicable with operational requirements, excavated areas will be progressively rehabilitated, to reduce the potential for windborne dust generation
- Truck mounted sprays will water unsealed, regularly trafficked areas such as access tracks, work areas and haul roads as conditions require
- Routine housekeeping practices will be employed to ensure that spillages and other materials that could contribute to dust generation do not accumulate within the Premises boundary
- Routine maintenance of machinery will be carried out to ensure efficient operation (to minimise exhaust particulate emissions)
- In the event that dust migrates beyond the Premises boundary, dust suppression measures will be immediately reviewed to ensure practices are being followed and / or to implement more stringent measures. Such measures could include the cessation of activities in the event of extreme adverse weather conditions
- All personnel (including contractors) will be informed of their responsibilities and the importance of minimising ambient dust levels during site inductions
- Any complaints received will be registered on the 'Environmental Complaints Register' and will trigger a review of the relevant dust management measures by the Site Supervisor as a basis for development and implementation of appropriate modified practice/s (Refer to Section 8 for a copy of the Complaints Register Form)

4.4.2 Management by Operational Activity

Table 4 sets out the dust management for operational activities.

Table 4: Dust management for Operational Activities

Operational activity	Proposed controls	Responsibility
Stripping of topsoil	<ul style="list-style-type: none"> - Where practicable, topsoil stripping to be confined to calm / light wind conditions - Monitor wind conditions in times of strong prevailing winds (>25 knots) in direction of closest sensitive receptors, and modify topsoil operations accordingly to mitigate dust generation (i.e. cease or limit operations, wet down working area) - Water truck will be stationed on site and used, in dry conditions and strong winds, for wetting down during topsoil stripping - Operator to monitor dust generation and potential for migration 	Site Supervisor
Soil (feedstocks) / topsoil stockpiling	<ul style="list-style-type: none"> - Stockpiles to be maintained at <7 m high - In dry weather and strong wind conditions (>25 knots), stockpiles to be watered down to prevent dust generation during operational activities - Newly created stockpiles will be wet down prior to the end of each day's operating activities - Site supervisor to proactively monitor visible dust crossing the boundary premises - Speed limit of <15 kms to be implemented on internal roads to minimise dust - Operator to monitor dust generation and potential for migration 	Site Supervisor
Gravel extraction	<ul style="list-style-type: none"> - Where practicable, topsoil stripping to be confined to calm / light wind conditions - Monitor wind conditions in times of strong prevailing winds (>25 knots) in direction of closest sensitive receptors, and modify excavation operations accordingly to mitigate dust generation (i.e. cease or limit operations, wet down working area) - Water truck will be stationed on site and used, in dry conditions and strong winds, for wetting down during excavation activities - Site supervisor to proactively monitor that visible dust does not cross the boundary premises - Maintain a minimum working area - Operator to monitor dust generation and potential for migration 	Site Supervisor

Operational activity	Proposed controls	Responsibility
Screening	<ul style="list-style-type: none"> - Where practicable, screening to be confined to calm / light wind conditions - Monitor wind conditions in times of strong prevailing winds (>25 knots) in direction of closest sensitive receptors, and modify excavation operations accordingly to mitigate dust generation (i.e. cease or limit operations, wet down working area) - Water truck will be stationed on site and used, in dry conditions and strong winds, for wetting down during excavation activities - Site supervisor to proactively monitor that visible dust does not cross the boundary premises - Maintain a minimum working area - Operator to monitor dust generation and potential for migration - Gravel screening and soil blending processes will not occur at the same time, mitigating dust generation 	Site Supervisor
Product stockpiling	<ul style="list-style-type: none"> - Stockpiles to be maintained at <7 m high - In dry weather and strong wind conditions (>25 knots), stockpiles to be watered down to prevent dust generation during operational activities - Newly created stockpiles will be wet down prior to the end of each days operating activities - Speed limit of <15 kms to be implemented on internal roads to minimise dust - Site supervisor to proactively monitor that visible dust does not cross the boundary premises - Operator to monitor dust generation and potential for migration 	Site Supervisor
Distribution of products from site	<ul style="list-style-type: none"> - Use of dust cart to wet down access roads in dry conditions - Site supervisor to proactively monitor visible dust not cross the boundary premises 	Site Supervisor
	<ul style="list-style-type: none"> - Haulage vehicles to cover loads when transporting to and from site 	Vehicle operator / Contractor
Transport of soil to site for rehabilitation	<ul style="list-style-type: none"> - Use of water truck to wet down access road in dry conditions - Site supervisor to proactively monitor visible dust does not cross the boundary premises 	Site Supervisor

4.5 Monitoring

Monitoring (when operating) will entail visual assessment by the Site Supervisor of both atmospheric levels of dust and dust deposition on surrounding sporadic vegetation. The aim of visual assessment is to identify any times of the day that wind conditions may impact more readily on dust emissions potentially migrating off site and evaluate dust management strategies for effectiveness and continual improvement (in line with Capital's Environmental Policy to work towards aligning site practices with ISO 14001). The Site Supervisor will undertake visual monitoring following the work instruction form.

Dust emission monitoring will be the responsibility of the Site Supervisor who will report to the General Manager. On a periodic basis and to verify visual assessment and mitigate the effectiveness of any desensitising of dust emissions by the Site Supervisor, the General Manager may conduct dust emission monitoring (if required).

Visual monitoring of atmospheric levels will occur daily. Vegetation monitoring will be conducted every 6 months.

A sample copy of the proposed dust and noise monitoring work instruction is provided Figure 7.

4.6 Training

All Capital employees will be required to undergo a site-specific induction, outlining the operational activity controls in this EAMP to prevent and reduce potential environmental emissions.

The induction will provide necessary awareness of dust management and the actions and work practices to minimise and report dust generation. Regular toolbox meetings will also be held to reinforce a positive attitude towards dust management and to highlight any issues that arise during the course of construction. A record of all training will be maintained.

4.7 Reporting

The Site Supervisor will be responsible for conducting monitoring and filing copies. Given that the site will generally only have two operational staff, daily observations will predominantly be taken and filed (i.e. work instruction completed and put in A4 folder on site).

Records will be made available to DWER on an as requested basis and included in the annual compliance report for the Prescribed Premises Licence.

All employees will be required to report any generation of significant dust emissions and especially any that may threaten to cross the Premises boundary to the Site Supervisor.

In the event that dust migrates beyond the Premises boundary, work will cease and dust suppression measures will be immediately reviewed to ensure practices are being followed and / or to implement more stringent measures. Such measures could include the cessation of activities in the event of extreme adverse weather conditions. Pending the severity of potential dust migration, the Site Supervisor will implement mitigation measures immediately on site, or discuss continual improvements measures with the General Manager.

Capital Dust and Noise Monitoring

To be completed by the Site Supervisor

Date:	2/3/2020		Supervisor:	Ian White	
Weather conditions:	Sunny, Light winds		Wind direction / strength:	SW 10km/h	
Stage:	1		Working area:	Eastern side - centre	
Today's activities	Extraction Loading Trucks		People on site:	2	
Equipment in use:	Excavator Wheel Loader Water truck		Trucks:	2 on turn around	
Dust control duties:	Ben Mitchell		Tanks used:	4	
Boundary Check for Assessment – All equipment operational					
	Dust			Noise	
South Boundary	I	A		I	A
West Boundary	I	A		I	A
North Boundary	I	A		P	A
East Boundary	I	A		P	A
Intensity Scale	A = Acceptable E = Excessive		Extent Classification	I = Intermittent P = Persistent	
Comments:	No issues		Signed:	Ian White	
Start time:	7.15am		Completion time:	3.30pm	

Page 1

Figure 7: Dust monitoring form

5 Noise Management

5.1 Potential impacts

Noise can arise from the operational activities outlined in Figure 8.

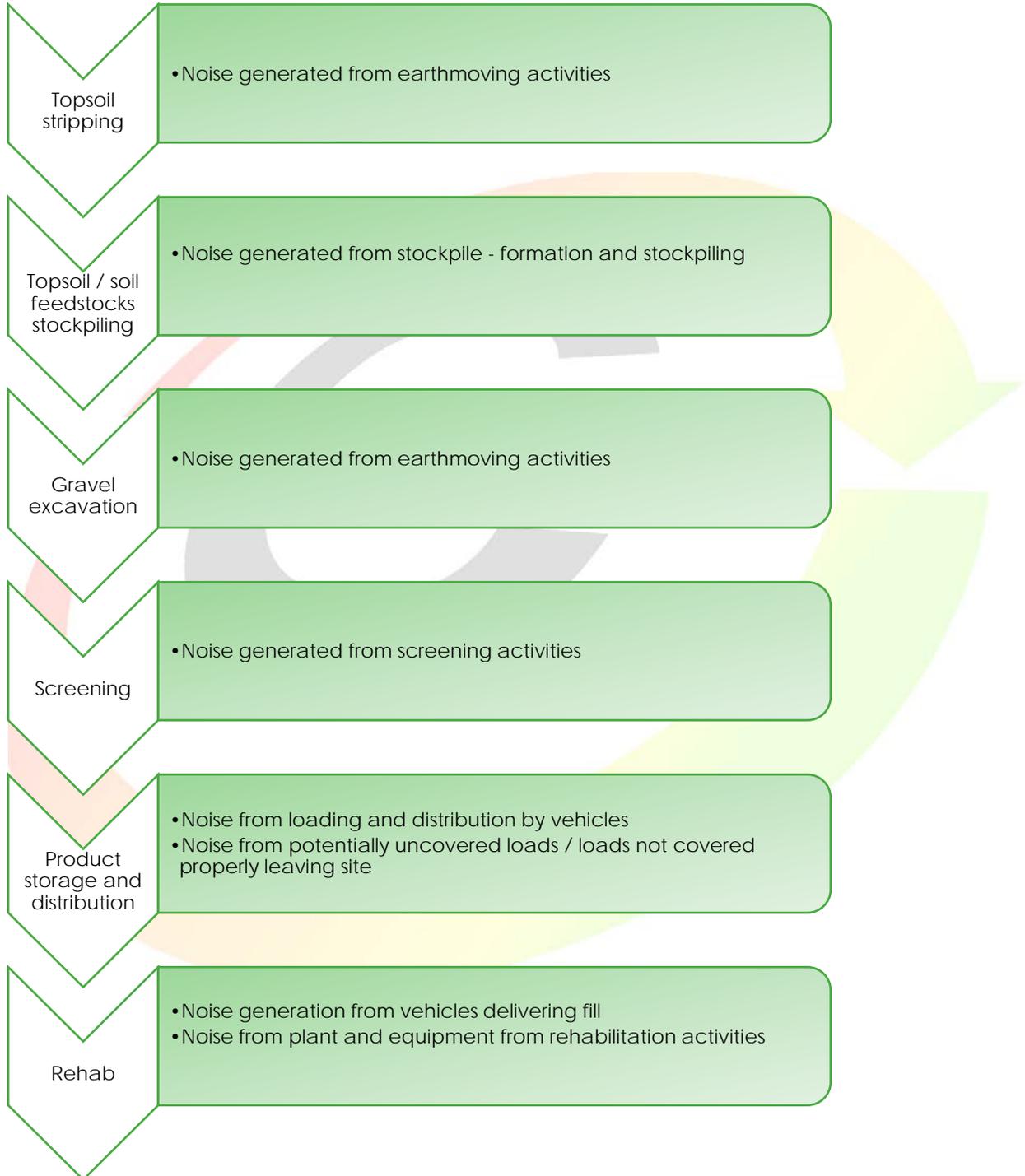


Figure 8: Activities generating noise

The potential noise impacts on residential receptors is expected to be mitigated given that:

- The closest residence is at least 830 m from the Premises boundary Operations will occur at least at a distance of 20 m within the boundary and 40 m from water course
- Operational activities will be on a campaign basis throughout the year for gravel extraction
- Operational activities may be on a campaign basis or will be dependent on product sales of topsoils
- Operational activities of gravel screening and soil blending will not occur concurrently
- Rehabilitation for will occur on a progressive basis where practicable
- Noise reduction measures on plant and equipment have been fitted and operations will occur between 7am and 7pm (in line with regulations).

Management of potential noise impacts will be implemented to mitigate:

- Risk to human health (site operational staff)
- Risk to human health (surrounding residences)
- Amenity aspects (potentially related to traffic movements in particular)

5.2 Risk Assessment

5.2.1 Noise generation – plant and equipment

A review of the risk assessment of Category 12 DWER licence and extraction activities was undertaken in accordance with the Environmental Protection (Noise) Regulations 1997 (As Amended)⁵ and changes to receptors in proximity to the Premises.

A noise impact assessment was undertaken in 2008 by the previous land owner for a (then) proposed development of a composting facility (VIPAC, 2009). This noise assessment was undertaken on the following equipment:

- excavator
- loader
- grader
- screening equipment
- truck movements

Note that the equipment currently in use for Stage 1 is similar to the above equipment and that this equipment will be used for extraction activities for Stage 2.

The results from the noise impact assessment are reproduced in Table 5 below.

⁵ Available: <https://www.der.wa.gov.au/your-environment/noise>, accessed April 2020

Table 5: Extract from VIPAC and Bowman (2013) noise impact assessment

Activity /Site Operation	Predicted Noise level, dB (A)	Day – time Noise Criteria, dB (A)	Assessment
Volvo Loader	44	45	Criteria Achieved
Truck loading	24		Criteria Achieved
Mulcher	36		Criteria Achieved
A digger/excavator	33		Criteria Achieved
Screening plant	44		Criteria Achieved

Whilst most of the noise assessment criterion were achieved, the assessment was conducted twelve years ago in 2008 and the potential impact on changes to residences in terms of location and cumulative noise emissions need to be considered.

In assessing the potential current risk associated with noise generation at the site, the following aspects are highlighted:

- The VIPAC Report (2009) assessed the impact on a residential receptor which was then located at 132 Warlin Road⁶ and approximately 530 m south of the Premises boundary. Since the time of the noise assessment in 2009, this site has been bought by Pure Earth Composting and the residences located 530 m south are unoccupied
- The closest residential receptor is now located approximately 830 m south of the Premises boundary, thus allowing for greater separation distance from site operational activities
- Gravel extraction activities will take place a minimum of 20 m from the Premises boundary and as for dust monitoring, monitoring of climatic conditions will be undertaken to mitigate potential noise impacts on the closest sensitive receptor in the event of strong wind conditions (>25 knots)
- Operational ‘campaigns’ are expected to be undertaken for a three to four week period at a time throughout the year
- Operational activities will be limited from between 7am and 7pm in line with Regulations including ‘start up’, ‘shut down’ and maintenance activities
- In the 12 years since the noise impact assessment, improvements to mitigating noise from plant and equipment have been implemented by Capital including reversing “croakers” (not beepers) on loaders

The Pure Earth Composting Facility located at approximately 600 m has been developed since 2013 and will most likely have submitted a Noise Management Plan to DWER for their licence application outlining management measures to mitigate noise generation; reducing the potential cumulative impacts of the two sites.

⁶ Note in the VIPAC (2009) report the name of the road is misspelt and that Lot 13 refers to Lot M1822 (assumption of Lot number changes as a result of transfer of land ownerships / subdivisions)

5.3 Objectives

The objectives of the Noise Management Plan are to:

- Take all reasonable and practicable measures to minimise noise generation during operational activities
- Comply with limits set by the Environmental Protection (Noise) Regulations 1997 (As Amended)

5.4 Management of potential noise emissions

To achieve the objectives, mitigation actions outlined below will be undertaken on a site wide basis. The following sub-section outlines mitigation activities to be undertaken for particular operational activities.

5.4.1 Site management

- Site personnel will undertake a site-specific induction including use of PPE to prevent health hazards and exposure to noise emissions
- Where practicable topsoil stripping, gravel excavation and rehabilitation activities will be undertaken in periods of calm or light winds to reduce noise migration (in particular in the direction of the closest residential receptor)
- The Site Supervisor will monitor wind conditions daily using a weather app to assess wind strength and direction. In the event of strong winds (>25 Knots) and in particular in the direction of the closest sensitive receptor, scheduling of operations with reduced potential for noise generation will be assessed. The scheduling of operations may include measures to alternate excavation and screening activities to reduce overall noise generation from the Premises
- Where practicable with operational requirements, excavated areas will be progressively rehabilitated, to reduce the potential for noise generation
- All plant (e.g. loaders) will be fitted with "croakers" to reduce high-pitched noise migration
- Screening activities will not be located inside 20 m of the Premises boundary, thereby increasing the distance from noise generation to receptors
- Routine maintenance of machinery will be carried out to ensure efficient operation
- All personnel will be informed of their responsibilities and the importance of minimising noise levels during site inductions
- Any complaints received will be registered on the 'Environmental Complaints Register' and will trigger a review of the relevant noise management measures by the Site Supervisor as a basis for development and implementation of appropriate modified practice/s. This may include undertaking of noise impact assessment by Capital in the unlikely event of sustained complaints from receptors within the proximity.

5.4.2 Management by Operational Activity

Table 6 sets out the noise management for operational activities.

Table 6: Noise management for Operational Activities

Operational activity	Proposed controls	Responsibility
Stripping of topsoil	<ul style="list-style-type: none"> - Site operational activities will be conducted between 7am and 7pm - Plant and equipment will be regularly maintained - "Croakers" as opposed to beepers will be fitted to mobile plant including loaders - Operator to monitor noise generation and potential for migration 	Site Supervisor
Topsoil / soil feedstocks stockpiling	<ul style="list-style-type: none"> - Site operational activities will be conducted between 7am and 7pm - Plant and equipment will be regularly maintained - "Croakers" as opposed to beepers will be fitted to mobile plant including loaders - Speed limit of <15 kms to be implemented on internal roads to minimize noise 	Site Supervisor
Gravel extraction	<ul style="list-style-type: none"> - Where practicable, gravel extraction to be confined to calm / light wind conditions - Monitor wind conditions in times of strong prevailing winds (>25 knots) in direction of closest sensitive receptors, and modify excavation operations accordingly (i.e. limit operations) - Site operational activities will be conducted between 7am and 7pm - Plant and equipment will be regularly maintained - "Croakers" as opposed to beepers will be fitted to mobile plant including loaders - Site supervisor to proactively monitor audible noise at the Premises boundary, especially in the event of all activities on site occurring (i.e. topsoil stripping / stockpiling, gravel extraction, screening and rehabilitation) - Maintain a minimum working area 	Site Supervisor

Operational activity	Proposed controls	Responsibility
Screening	<ul style="list-style-type: none"> - Where practicable, screening to be confined to calm / light wind conditions - Monitor wind conditions in times of strong prevailing winds (>25 knots) in direction of closest sensitive receptors, and modify excavation operations accordingly to mitigate noise generation (i.e. limit operations) - Site supervisor to proactively monitor audible noise at the Premises boundary, especially in the event of all activities on site occurring (i.e. topsoil stripping / stockpiling, gravel extraction, screening and rehabilitation) - Site operational activities will be conducted between 7am and 7pm - Plant and equipment will be regularly maintained - "Croakers" as opposed to beepers will be fitted to mobile plant including loaders - Maintain a minimum working area 	Site Supervisor
Product stockpiling	<ul style="list-style-type: none"> - Site operational activities will be conducted between 7am and 7pm - Plant and equipment will be regularly maintained - "Croakers" as opposed to beepers will be fitted to mobile plant including loaders - Speed limit of <15 kms to be implemented on internal roads to minimise dust 	Site Supervisor
Rehabilitation activities	<ul style="list-style-type: none"> - Where practicable, screening to be confined to calm / light wind conditions - Where practicable, rehabilitation to occur progressively in working areas - Monitor wind conditions in times of strong prevailing winds (>25 knots) in direction of closest sensitive receptors, and modify excavation operations accordingly to mitigate noise generation (i.e. limit operations) - Site supervisor to proactively monitor audible noise at the Premises boundary, especially in the event of all activities on site occurring (i.e. topsoil stripping / stockpiling, gravel extraction, screening and rehabilitation) - Site operational activities will be conducted between 7am and 7pm - Plant and equipment will be regularly maintained - "Croakers" as opposed to beepers will be fitted to mobile plant including loaders 	Site Supervisor
Distribution of products from site	<ul style="list-style-type: none"> - Distribution of products from site to occur between 7am and prior to 7pm - Product loads to be covered on distribution from site 	Site Supervisor

Operational activity	Proposed controls	Responsibility
	<ul style="list-style-type: none"> - Speed limits to be adhered to on access roads. Capital and Pure Earth lease a 20 m wide section of land to provide a private access road to both Premises with a speed limit of 40 km on this road. Where the private road comes out on Horton Road is beyond any receptors and there are truck passing bays constructed. The remaining section of Horton Rd only gives direct access to Pure Earth and Capital. It also has a 40 km limit. - Trucks are not to idle at Premises entry / exit areas 	Vehicle operator / Contractor
Transport of soil to site for rehabilitation	<ul style="list-style-type: none"> - Use of water truck to wet down access road in dry conditions - Site supervisor to proactively monitor visible dust crossing the boundary premises 	Site Supervisor

5.5 Monitoring

Monitoring of noise at the boundary will be undertaken by the Site Supervisor using the work instruction sheet. In particular, monitoring will be undertaken when all plant and equipment is in use on site (i.e. for topsoil stripping / stockpiling, gravel extraction, screening and rehabilitation activities; or a combination thereof). The aim of on-site monitoring is to identify any times that activities may impact on noise generation and cumulative noise emissions, and evaluate noise management strategies for effectiveness and continual improvement (in line with Capital's Environmental Policy to work towards aligning site practices with ISO 14001).

Noise emission monitoring will be the responsibility of the Site Supervisor who will report to the General Manager. On a periodic basis and to verify monitoring and mitigate the effect of any desensitising to noise by the Site Supervisor, the General Manager will conduct noise emission monitoring.

Noise monitoring will occur daily and notably when all plant and equipment is in use on site (i.e. for topsoil stripping / stockpiling, gravel extraction, screening and rehabilitation activities; or a combination thereof). Monitoring will be recorded on a daily basis and filed in A4 folder on site.

A sample copy of the proposed dust and noise monitoring work instruction is provided Figure 7.

5.6 Training

All Capital employees will be required to undergo a site-specific induction, outlining the operational activity controls in this EAMP to prevent and reduce potential environmental emissions.

The induction will provide necessary awareness of noise management and the actions and work practices to minimise and report noise generation. Regular discussions in toolbox meetings will also be held to reinforce a positive attitude towards noise management and to highlight any issues that arise during the course of processing. A record of all training will be maintained.

5.7 Reporting

The Site Supervisor will be responsible for conducting monitoring and filing copies. Given that the site will generally only have two operational staff, observations will predominantly be taken with daily copies of observations filed (i.e. work instruction completed and put in A4 folder for storage at the Head Office with the Operations Manager).

Records will be made available to DWER on an as requested basis and included in the annual compliance report for the Prescribed Premises Licence.

All employees will be required to report any generation of significant noise emissions to the Site Supervisor.

In the event that noise complaints are received, noise mitigation measures will be immediately reviewed to ensure practices are being followed and / or to implement more stringent measures. Such measures could include the limit of a combination of operational activities. In the event of continued noise complaints, Capital will undertake a noise impact assessment and implement recommended strategies.



6 Water Management

6.1 Baseline Summary

An assessment of the groundwater was undertaken for the previous land owner to Capital and reported in 'Water Assessment' (Crisalis International Pty, 2008). The investigations concluded that:

- Groundwater under the Premises was mostly of good quality with Total Dissolved Solids (TDS) between 68-451 mg/L
- Nearer the watercourse, groundwater TDS increased to over 2,000 mg/L
- Groundwater contained up to 8 mg/L total nitrogen (nitrite plus nitrate) and lesser amounts of organic nitrogen
- In some bores, groundwater contained low concentration of nutrients
- Surface water in the watercourse was of poor quality with 2,000 mg/L
- Surface water also showed low concentrations of nitrogen and no detectable phosphate

6.2 Directional flow of water

6.2.1 Groundwater

The monitoring bore locations are indicated in the 'Groundwater Contour Plan' in the Crisalis report and are located in Stage 1 extraction area on the Premises. Investigations conducted for the Crisalis report, stated that: *groundwater flowed mostly eastwards towards the small creek running across the property and discharged to the creek as base flow, in small spring discharges, and through a waterlogged groundwater discharge area where vegetation has been impacted* (Crisalis, 2008 pg. 13).

6.2.2 Surface water

The direction of stormwater and surface water flow for Stage 1 is towards the north east of the watercourse. Stage 2 is located on the eastern side of the site to the east of the watercourse and stormwater flow is towards the south west.

A clay bunding and the high clay content of the soils will serve to capture any runoff from the site and "pool" water for evaporation mitigating deposition of sediment into the watercourse. Note also that excavation activity of gravel will not occur or be limited during the winter months and the site will not be operational on a continuous daily basis; thus mitigating the potential impacts of sediment deposition into the watercourse.

6.3 Potential Impacts

Surface and groundwater may be impacted by the operational activities listed in Figure 9.

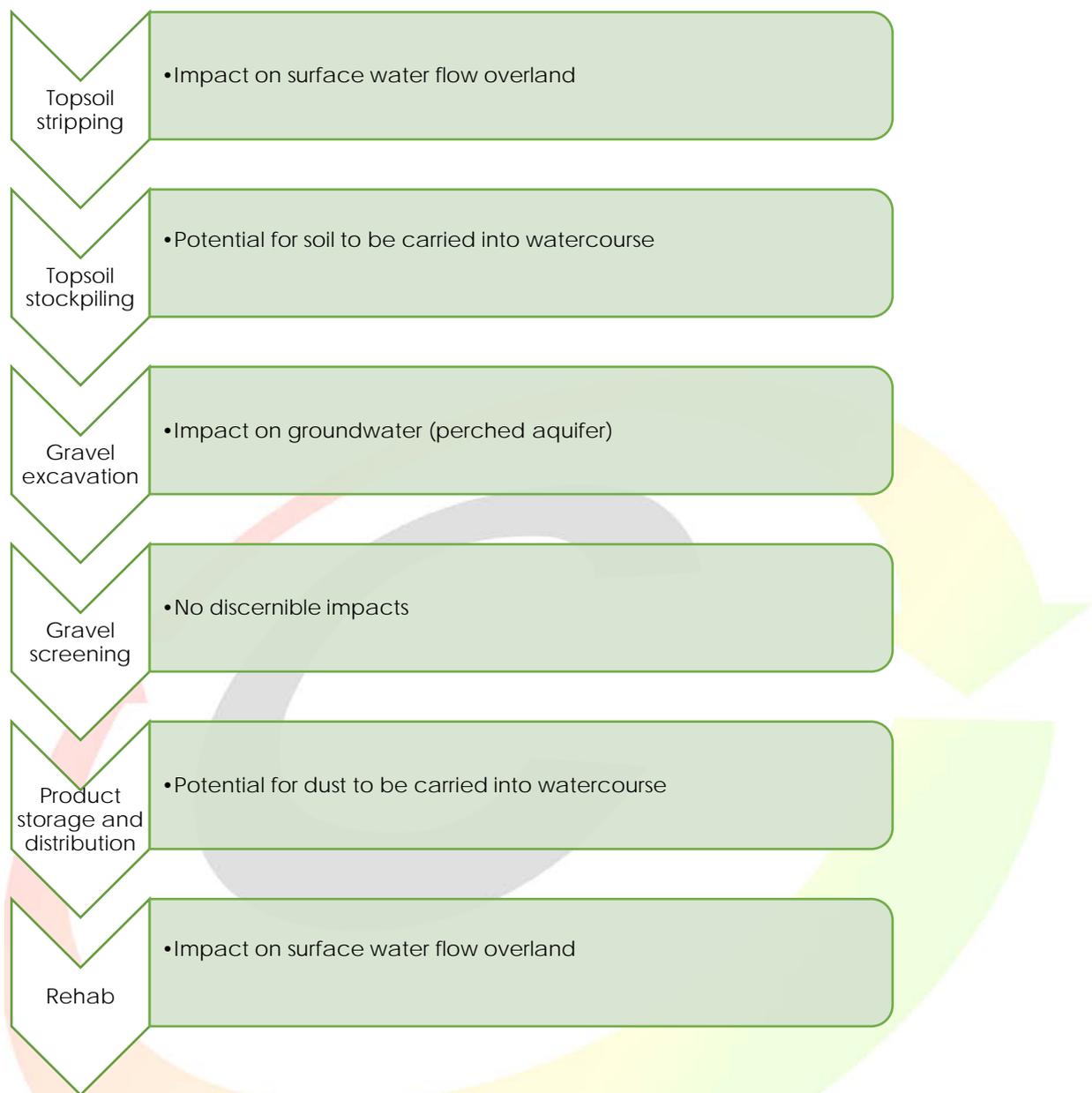


Figure 9: Activities impacting surface and groundwater

6.4 Objectives

- To manage ground and surface water quality in line with relevant DWER Regulations
- To prevent deposition of sediment into the water course

6.5 Management of potential water impacts

- Gravel excavation activities will not be undertaken or be limited in periods of heavier rainfall, generally June to August
- The Site Supervisor will monitor rainfall conditions daily to assess potential inundation of gravel pits. In the event of heavy rainfall (in particular outside of winter months), scheduling of extraction activities will be assessed to mitigate any potential to impact

higher (occasional) groundwater levels. The scheduling of operations may include measures to cease excavation in the event of extreme adverse weather conditions

- A clay bunding and the high clay content of the soils will serve to capture any runoff from the site and “pool” water for evaporation mitigating deposition of sediment into the watercourse
- Where practicable with operational requirements, excavated areas will be progressively rehabilitated to reduce the potential for pits to become inundated (though there are observed high evaporation rates in the summer months)
- Routine housekeeping practices will be employed to ensure that spillages and other materials do not contribute to surface water pollution
- Routine maintenance of machinery will be carried out to ensure efficient operation (to minimise spillages)
- All personnel will be informed of their responsibilities and the importance of minimising any impacts to surface and groundwater

6.6 Monitoring Regime

In accordance with DWER Category 12 licence L9251, surface and groundwater will be monitored on a bi-annual basis and Figure 7 shows the monitoring bores and surface monitoring locations. Sample analysis will be undertaken by a National Association of Testing Authorities (NATA) laboratory for the parameters outlined in Table 7 and Table 8. Sampling methods will be conducted in accordance with AS/NZS 5667.4 and AS/NZS 5667.11 for surface and ground water sampling respectively. Figure 10 shows the monitoring locations.

Table 7: Surface monitoring location and parameters

Monitoring location	Parameter
Upstream location 1 and 2, and Downstream location 3	<ul style="list-style-type: none"> - Turbidity (NTU) - pH (pH unit) - Electrical conductivity (uS/cm) - Total dissolved solids (mg/L) - Total nitrogen (mg/L) - Phosphorous (mg/L)

Table 8: Groundwater monitoring locations

Monitoring location	Parameter
MB1, MB2, MB4	<ul style="list-style-type: none"> - Standing water level (m AHD) - pH (pH unit) - Total dissolved solids (mg/L) - Total nitrogen (mg/L) - Phosphorous (mg/L)

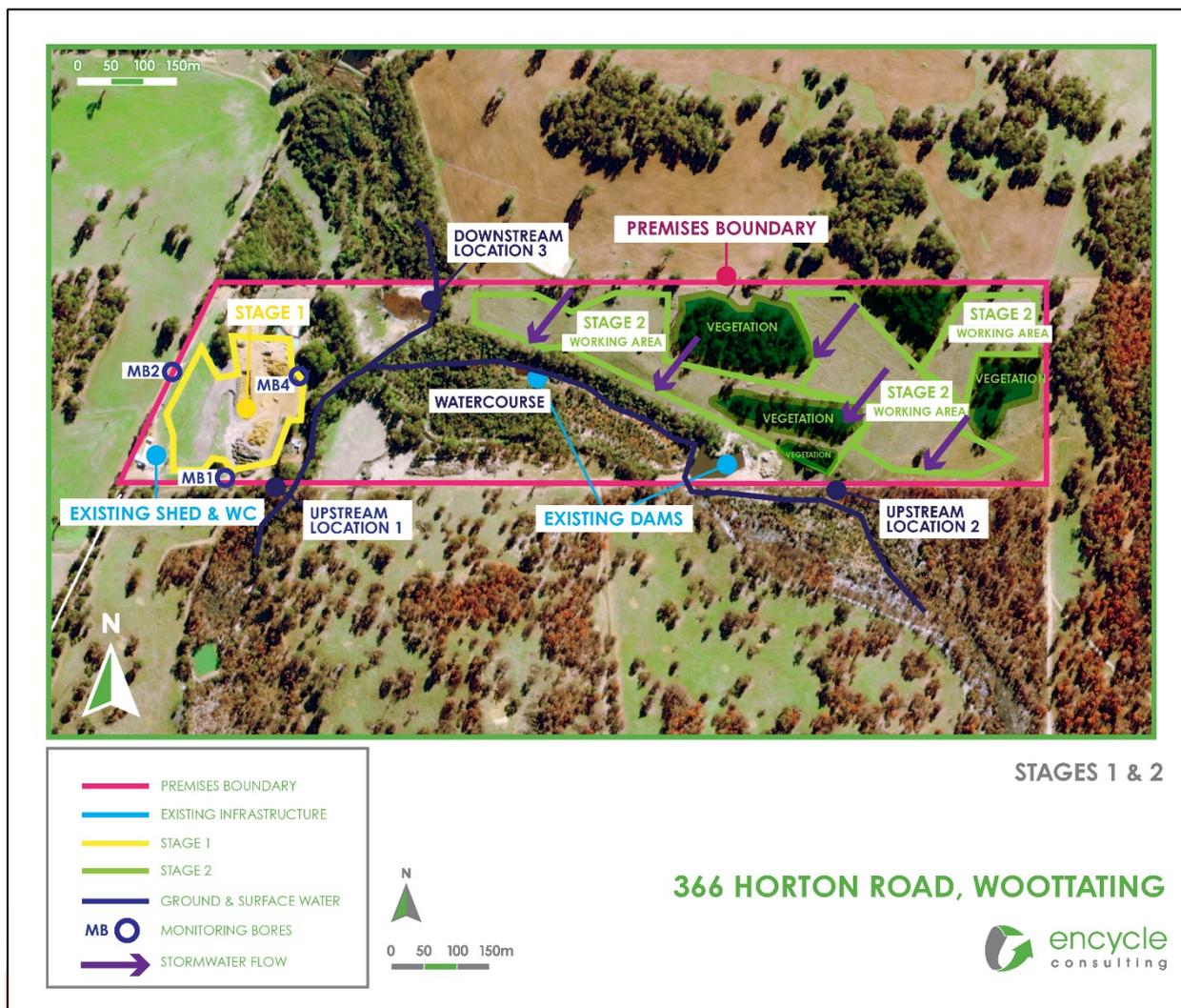


Figure 10: Surface and groundwater monitoring locations*

*Stage 2 is proposed area, no activities being undertaken

6.7 Training

Designated Capital employees will be trained by specialist subcontractor to take field and laboratory water samples and appropriately store samples for transport. A NATA accredited laboratory will be used to analyse the samples. The relevant employee induction will provide necessary awareness of water management to prevent any impacts from pollution. A record of all training will be maintained.

6.8 Reporting

The surface and groundwater results will be compared against relevant DWER Guidelines and submitted to DWER as part of the annual licence compliance report. The Site Supervisor and General Manager will review any 'spikes' in results or trends with respect to water quality, and any potential actions that need to be taken (e.g. implementation of additional silt traps and retention pits) to limit any impact on surface watercourse quality.

6.9 Results

6.9.1 2021

As per DWER licence conditions, groundwater levels were monitored in April 2021 bores MB1, MB2 and MB4 were all reported as 'dry'. Consequently, groundwater will be monitored in winter 2021 as well as surface watercourse. Monitoring bores MB3 and MB5 had collapsed and could not be sampled.

Table 9: Groundwater level results

Date	Bore	By	Equipment	Result (mBGL)
30/04/2021	MB1	D Markham	Electronic dip meter	Dry
30/04/2021	MB2	D Markham	Electronic dip meter	Dry
30/04/2021	MB4	D Markham	Electronic dip meter	Dry

7 Rehabilitation Plan

7.1 Gravel Extraction Operations

Gravel extraction will be undertaken at the Premises (366 Horton Road) and the site rehabilitated with soil suitable for native vegetation and to ameliorate the gravel soils for use as a cropping medium.

The extraction of gravel will be undertaken in a staged approach. Figure 11 shows Stage 1 and 2 gravel extraction areas and Table 10 outlines tonnes to be extracted.

No vegetation will be cleared.

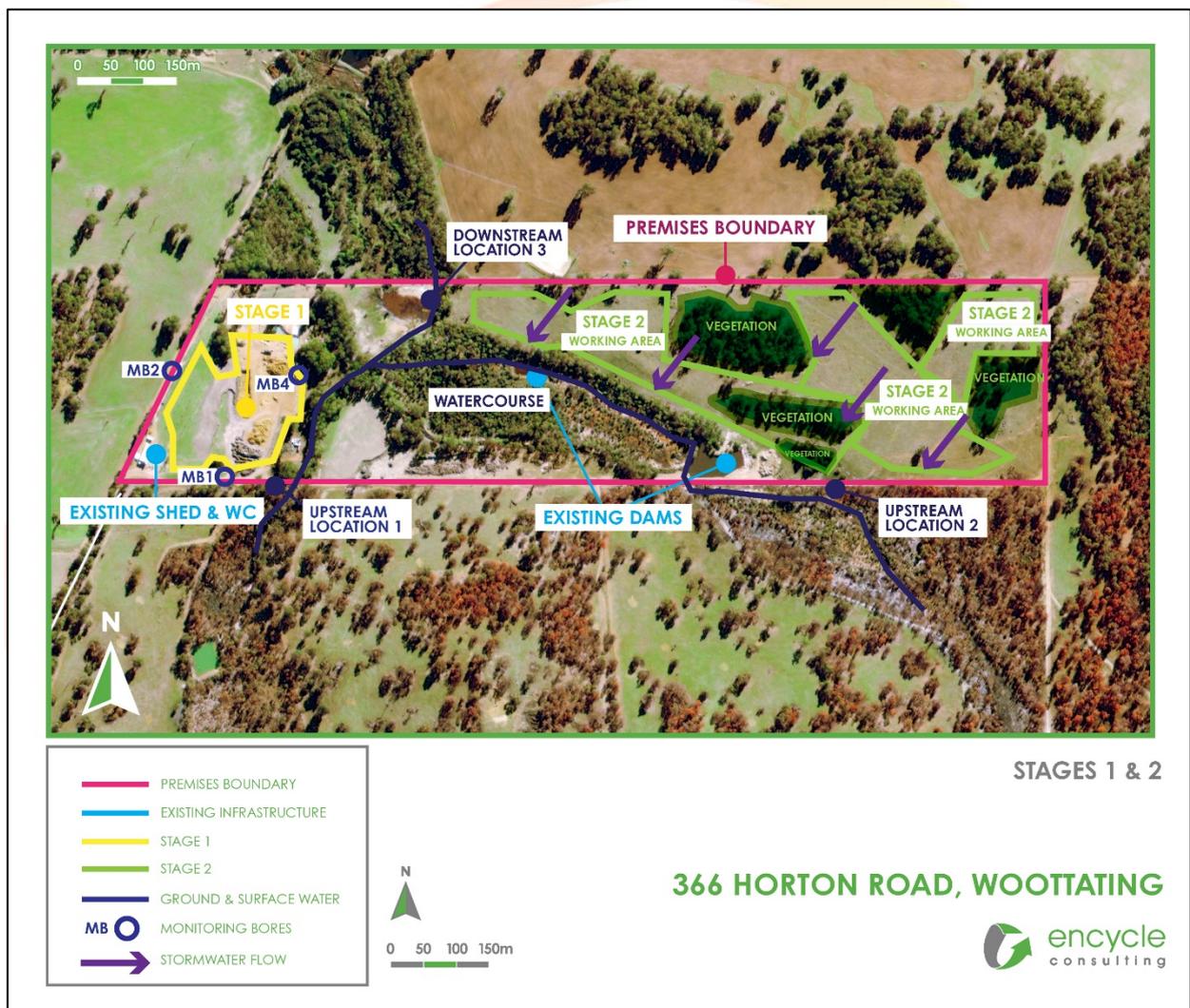


Figure 11: Stage 1 and 2 gravel extraction working areas

Table 10: Gravel extraction for Stage 1 and 2

Stage	Area (m2)	Projected extraction volume (m ³) Loose	Projected extraction weight (t)*	Amount extracted to date (t)
Stage 1	29,100	72,750	94,575	41,028
Stage 2	76,000	152,000	197,600	n/a

*Note excavations undertaken for Stage 1 show that depths can range from 1 m to generally 3 m in depth, and occasionally 4 m depth. An average depth of 2.5 m for excavations across the Stages has been used to project the extraction volumes and tonnes. Photos 1 and 2 show typical gravel excavations.



Photo 1: Excavation showing gravel, clay and laterite

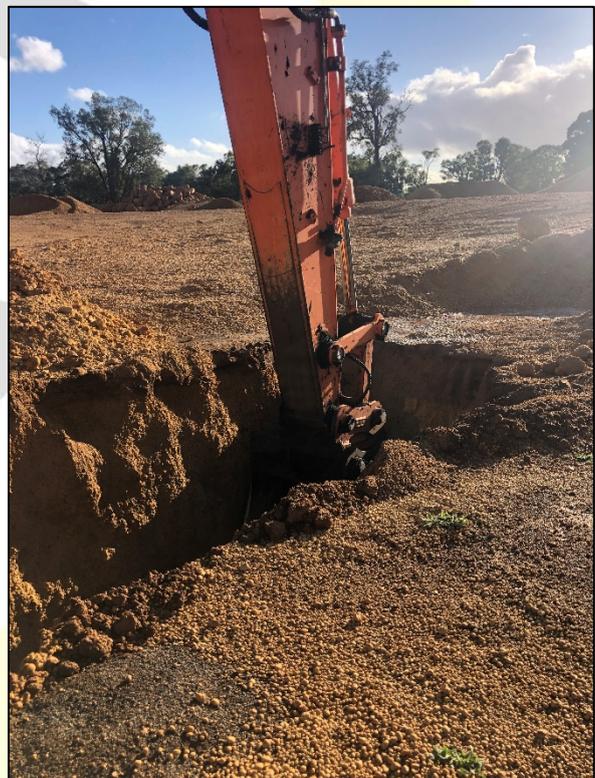


Photo 2: Excavated gravel pit – typical depth

7.1.1 Duration

Periodic gravel extraction and screening will be undertaken on a campaign basis. A campaign would last about three weeks (and a maximum of 8 campaigns are expected during the year). Operational hours will be from 7am to 7pm (in line with noise regulations).

Pending weather conditions and in particular, heavy rainfall events, gravel extraction may not be undertaken in winter months. Topsoil stripping, screening, blending and product storage could be undertaken at the site during these months. Gravel extraction will be limited to mitigate any potential impacts to groundwater given that the perched water table is likely higher to the

surface in winter months. Products will be stored on site prior to transport offsite and stockpile management will be put in place with stockpiles not reaching more than 7 metres in height.

7.1.2 Process flow

The process steps in extraction and screening of gravel and rehabilitation are outlined Figure 12. Where possible, operational activities will occur on a progressive basis in working areas within Stages.



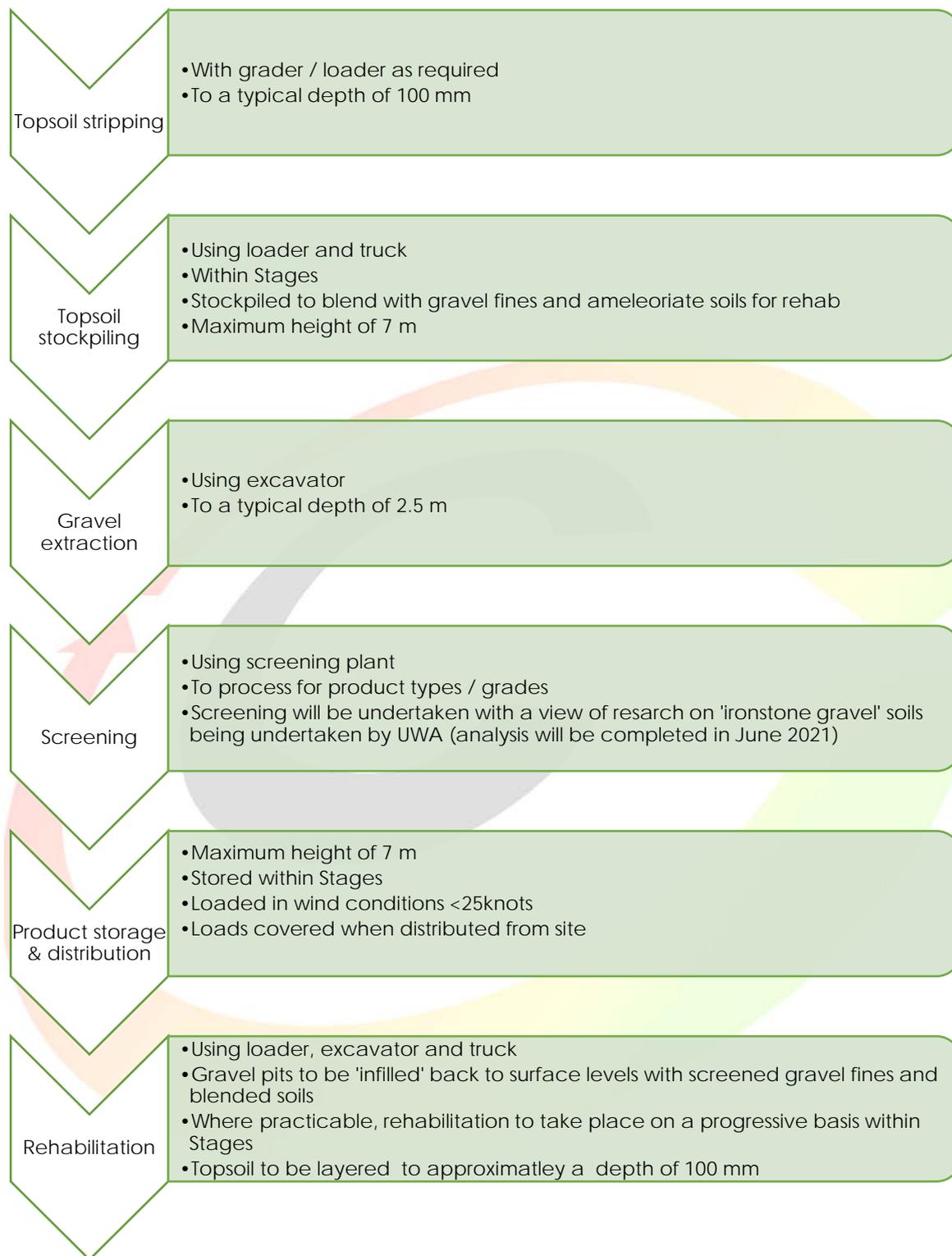


Figure 12: Gravel extraction process flow

7.1.3 Topsoil stripping

Top soil will be stripped to a depth of 100 mm within each Stage. The stripped stockpile will be located adjacent to the relevant excavated area. Stripped top soil during site preparation will be spread directly onto progressively backfilled excavated areas at a depth of 100 mm. Stockpiled top soil will be used for rehabilitation within 2 years to retain any of the soil's biota. Overburden, when available, will be pushed to the south and west of the Stages extraction area, which will have the added benefit of facilitating visual and noise screening. From there it can be used for the rehabilitation purposes.

7.1.4 Gravel extraction

Gravel extraction is anticipated to a typical depth of 2.5 m across Stages. The gravel will be extracted typically using an excavator and stockpiled within Stage. The extracted gravel will be screened to different grades and separately stockpiled. Predominantly, screened gravel fines will be used to rehabilitate the site (and "infill" the excavated gravel pits).

7.1.5 Constructing gradient stability

Across the base of the gravel pit/s, the excavation will be carried out at a maximum 1:2.5 slope. An access ramp will be constructed at one location for access into the excavation. The access ramps will be maintained at a maximum slope of 1:4 and will have a minimum track width of 4 m. The internal side batters of the pit will have a maximum slope of 1:2.5 for stability. Any unstable section identified on the internal batter during the excavation activity will be reinstated by removing loose material and reducing the slope.

7.2 Rehabilitation Measures

7.2.1 Objective

The primary objective of the rehabilitation plan is to rehabilitate Stage 1 and 2 excavated areas to a safe and stable landform to, as close as possible, the original surface levels.

Given the surrounding rural land uses for cropping and the cleared nature of the site, Capital will rehabilitate and ameliorate soils in each Stage so that the site could be used as a crop land or grazing land.

7.2.2 Surrounding land uses

The site is surrounded by rural properties used for cropping, sheep or cattle grazing with the closest sensitive residential receptors located at 830 m south west of the site. Table 1 outlines the surrounding land uses and closest sensitive receptors.

7.2.3 Vegetation establishment

Capital through Encycle Consulting has engaged with the University of Western Australia (UWA) School of Agriculture and Environment to develop a soil product blend from the extracted gravel fines on site, on site topsoil and / or from soils brought to rehabilitate the site for improved cropping predominantly for animal feed purposes.

The Grains Research and Development Corporation (GRDC) commissioned UWA to research growing grain crops on problematic 'ironstone gravel' (as per those soils *in situ* at 366 Horton Road). The research is to improve knowledge about the properties of gravel soils, which could result in more informed management of the grain crops grown on them. The result of this research is due to be completed in July 2021 after which time Capital will work with UWA to determine a soil recipe mix for cropping.

The GRDC Gravel Project Lead will review and input to the proposed research into soil amelioration for cropping purposes at the Capital site. It is understood the research and rehabilitation of soils on site at 366 Horton Road will also be reported in the GRDC project for use in the Shire of Northam rural area and the broader WA areas where 'ironstone' soils are present.

The specific project steps for the UWA student to carry out will be mapped out when the student commences in Semester 1 of 2021. Capital can provide the project plan inclusive of proposed soils, on site soil properties and analysis conducted by UWA, and outcomes of ameliorated site soils to the Shire of Northam and DWER.

It is proposed this research would be of benefit to the surrounding rural properties situated on ironstone gravel soils and to the broader farming community located within the Shire of Northam.

On site and research steps include:

- No native vegetation clearing will be undertaken within the Stages of gravel excavation
- Landform reconstruction and contouring
 - The restoration of the excavated gravel pits will be undertaken progressively, where practicable, to minimise emissions and to infill pits to mitigate any potential impacts from winter rains and pooling of water. As excavations will either not be undertaken or will be limited in winter months, pooling of water will not occur or be mitigated
 - Temporary clay bunds will be constructed to further mitigate surface run-off
- Topsoil / overburden removal replacement
 - Where possible topsoil and overburden will be directly transferred from previously stripped excavation areas to an area to be rehabilitated. Topsoil or overburden may be screened to produce an appropriate soil medium for rehabilitation
 - A visual representation of the excavation / "infill" works is show in Figure 11
- Erosion control
 - The finished surface will be left loose and slightly undulating to assist in reduction of surface flow rate and increase the seepage of water into the ground
 - Measures to mitigate surface and groundwater impacts are outlined in section 6

- Capital has engaged with UWA (through Encycle Consulting) to determine the blend of 'ironstone gravel' with respect to findings on research commissioned by the GDRC on the use of 'ironstone gravel' soils and the rehabilitation of sites for agriculture crops. The purpose of this research is to determine blends of soil products to ameliorate soils and produce higher yields on agricultural properties where 'ironstone gravel' soils is the underlying geology
- Initial steps outlined by UWA in discussion with Encycle are to engage an Honours or Masters student to:
 - Review findings from the GDRC research and applicability to the Woottating site
 - Develop a soil sampling plan to analyse soils on site and amelioration required to rehabilitate the site for crop land and / or grazing land
 - Recommend rates of gravel to blend with soils and rates of soil to apply for one or two cropping or grazing species (e.g. ameliorated soils and rates to use for growing maize, lupins etc.)
 - Observe, through visual growth records of crops and growth of roots, how crops performed in the ameliorated soils
 - Write up findings and compare with findings from the GDRC research

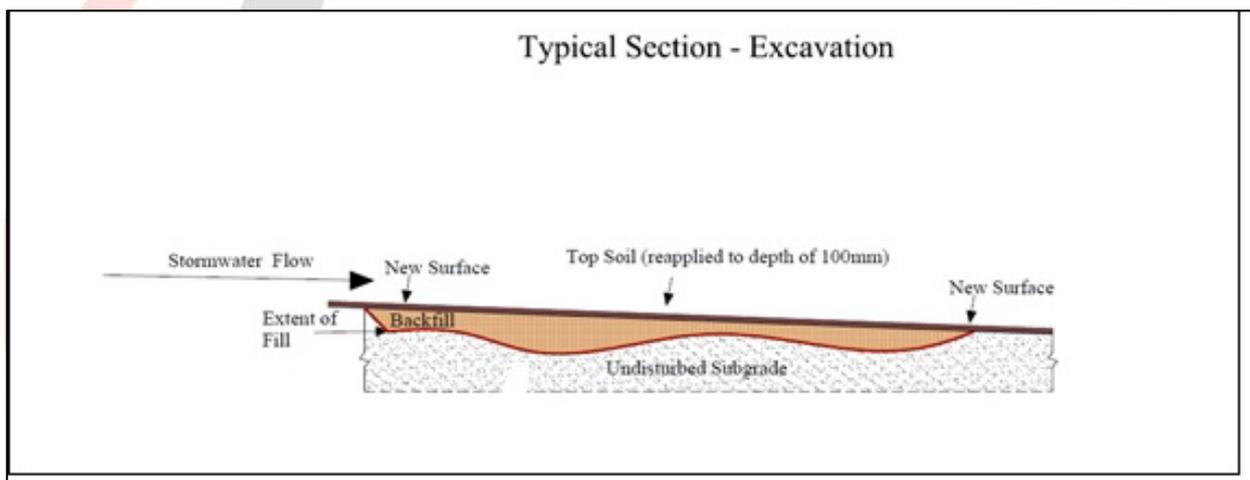


Figure 13: Gravel extraction section and rehabilitation sketch

8 Traffic Management Measures

8.1 Objective

To mitigate the potential environmental emissions of vehicle movements to and from site, and maintain Horton Road as per the Shire of Northam Deed Clause 1.1 for the site with Capital (business trade name)⁷.

8.2 Assessments / Access

The Traffic Impact Statement (Shawmac, TIS 2013), provided as supporting documentation⁸, has been reviewed with consideration to gravel operations for the current Category 12 licence (L9251) and application for the EILs. Note that the extracted tonnes for the Category 12 licence and EIL will be undertaken progressively.

Less traffic movements to / from site for the extraction activities are expected than those assessed in 2013 by Shawmac. Conservatively, however, Capital applied for the current DWER Category 12 licence based on the Traffic Impact Statement undertaken by Shawmac of 20 vehicle movements per day during operational days.

No significant changes have been made to the Great Eastern Highway and the lease agreement for private access to Carter Road is. Consequently, the Shawmac TIS has been submitted for the EIL renewal as supporting documentation.

The lease agreement between Capital and their neighbouring property at Lot 9249 Carter Road is current and Section 6 of this lease outlines 'use of land' access and traffic management measures (as provided in the extract in Figure 13).

8.3 Procedures

In addition to the traffic management measures outlined in the noise management and odour management sections of this EAMP, and the above access lease agreement for use of Carter Road to minimise any impacts on local roads, Capital will:

- Use trucks that are well maintained, serviced regularly and with up to date engine standards to minimise noise impacts
- Instruct drivers and any contractors to minimise the use of exhaust brakes on Carter Road and Horton Road
- Backload trucks, where possible, to minimise the number of truck trips
- Induct and brief drivers and contractors on the local operational requirements to minimise impact on Carter Road and Horton Road
- Induct and brief drivers to enter and exit the site via Great Eastern Highway / Carter Road intersection only to mitigate the potential impact on local roads
- Register and investigate any complaints to review and implement measures, if necessary, to mitigate impacts (refer section 10 for a copy of the complaints form and register)

⁷ Refer supporting documentation 'Attachment: Deed for site 366 Horton Road'

⁸ Refer supporting documentation 'Attachment: Shawmac (2013), Traffic Impact Statement'

6. USE OF LAND

The Tenant:

- (a) must use the Land only for the Permitted Use set out at Item 11 of the Schedule;
- (b) must comply on time with all laws and the requirements of authorities in connection with the Land at its sole cost and expense;
- (c) may fully use the Land as a road and pass and repass over it with or without any form of vehicle or machinery and may allow any third parties requiring access to or from the Tenant's premises at lot 13 on Diagram 87525 being the whole of the land in certificate of title volume 2026 folio 553 to do the same;
- (d) may only use the land between 7.00am and 7.00pm;
- (e) shall ensure that the gates to the road are kept locked except during the hours authorised in clause 6(d) above;
- (f) must take all reasonable steps to minimise the nuisance the Landlord caused by the use of the Land as a road including but not limited to minimisation of dust and noise from the Land; and
- (g) must use its best endeavours to restrict speed of travel along the Land to 50km/hr by:
 - (i) erecting maximum speed signs;
 - (ii) if necessary the installation of speed humps sufficient to restrict speed on the Land to 50km/hr; and
 - (iii) the erection of a stop sign at the entry point of vehicles onto the road.

Figure 14: Extract of lease agreement on 'use of land' for Carter Road

9 Fire Management

Capital engaged Bushfire Protection Australia and a 'Bushfire Management' has been prepared for the site and is provided as supporting information to the EIL renewal application⁹.



⁹ Refer supporting documentation 'Bushfire Protection Australia (2020), Bushfire Management Plan – Capital'

10 Environmental Complaints Register



19 Felspar Street
Welshpool WA 6106

Ph: (08) 9279 4599
www.capitalrecycling.com.au

info@capitalperth.com.au
ar@capitalperth.com.au (Accounts)

Capital Yard or Site Complaint Form

To be completed by the senior employee receiving details of the complaint

Date:	<i>1/5/2020</i>	Site:	<i>Gravel Pit</i>
Person receiving complaint:	<i>John Smith</i>	How was the complaint made?	<i>Phone call</i>
Name of Complainant:	<i>Fred Farmer</i>		
Details of complaint:	<i>Fred phoned HO who immediately rang me as site supervisor. Fred had observed plumes of dust from loader loading trucks potentially crossing property boundary.</i>		
Action taken:	<i>Stopped loading. Increased water spray onto stock pile being loaded. This worked initially but wind strength increased so loading trucks was abandoned till next day</i>		
Reported action to:	<i>General Manager</i>	Follow up required:	<i>no</i>
Does the incident require report to the appropriate authorities (i.e. DWER or Local Government)?		<i>Listed for annual report</i>	
Any other details/information:	<i>-</i>		
Close Complaint:	<i>2/5/2020</i>		
Signature:	<i>J. Smith</i>	Date:	<i>2/5/2020</i>

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