

Balmoral South
Air Quality Assessment

Prepared for

Maunsell

By

Air Assessments

April 2007

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Status	Version	Prepared by	Reviewed by	Submitted to Client	
				Copies	Date
Draft Report	1	Owen Pitts	David Pitt Environmental Alliances	PDF file	9 January 2007
Draft	2	Owen Pitts	Incorporates revision to the number of gas turbines.	PDF file	10 April 2007
Final	0	Owen Pitts	Maunsell	PDF file	19 April 2007

Table of Contents

1	Introduction.....	1
2	Atmospheric Emissions	2
2.1	Emissions from Balmoral South – Normal Operation	2
2.2	Speciation and Reactivity of Particulate	6
2.3	Greenhouse Emissions	6
2.4	Emissions from Balmoral South – Non Routine Operation	6
2.5	Other Significant Sources of Atmospheric Emissions in the Area	7
3	Ambient and Emission Criteria.....	9
3.1	Ambient Criteria - Health	9
3.2	Ambient Criteria - Vegetation.....	10
3.3	Comparison to Emission Criteria	11
4	Existing Air Pollutant Concentrations in the Region.....	13
5	Modelling Methodology	14
5.1	AERMOD Model Set Up.....	14
5.2	AERMOD Model Set Up.....	15
5.3	Meteorological Data.....	15
5.4	Proportion of NO _x in the form of NO ₂	17
5.5	Background Concentrations used in Modelling	18
6	Predicted Concentrations	19
6.1	Concentrations from the Balmoral South plant Alone	19
6.2	Cumulative Impacts from Balmoral South and Mineralogy	24
6.3	Assessment of Smog Impacts.....	29
7	Conclusions and Recommendations	31
8	References.....	33
	Appendix A Typical AERMOD File	35

1 Introduction

Australasian Resources (AR), propose to construct a new iron ore mine at the southern Balmoral deposit located at Cape Preston. The project area is immediately south and adjacent to the Mineralogy Cape Preston project. The AR project will consist of a mine, concentrator, pellet plant, HBI plant, associated power station and desalination plant. As part of studies for the Project Definition Document (PDD) to be submitted in the Integrated Project Approvals System (IPAS), Maunsell have contracted Air Assessments to undertake a preliminary air quality assessment of SO_x, NO_x, and dust from the pellet plant, HBI and power station. As detailed designs for the plant are not yet available, the emissions apart from the power station have been based on the data used in the Mineralogy facility (EPA, 2002).

Given the time frame and preliminary nature of the data available, only an indicative study of the local impacts can be undertaken. That is, the study addresses local impacts within 10 km. This study does not address a regional assessment of smog impacts and its effect further afield such as in the Dampier region, though recourse is made to initial assessments conducted for Mineralogy (then Austeel) by SKM (2000) and reported in HGM (2000).

2 Atmospheric Emissions

2.1 Emissions from Balmoral South – Normal Operation

As the project is in initial design stage, detailed emission characteristics were not available. These therefore have been sourced from the adjacent, similar Mineralogy proposal. As described in that assessment (SKM, 2000), sources of air emissions include:

- Mining activities; the haulage operations, material handling, wind erosion from open areas and stockpiles and combustion products from vehicles. Combustion products are considered to have a minor impact because of the widespread and diffuse nature of the emissions and are generally not modelled. Fugitive particulate emissions can, however, lead to high dust concentrations in the immediate area. In this report and in the Mineralogy assessment, predictions of concentrations have not been undertaken as they are difficult to quantify and therefore model and importantly as there are no nearby sensitive areas such as residential areas. It is considered that instead of a modelling assessment, emissions from these sources are best addressed through management practices and commitments by the proponent;
- The pellet plant. Air emissions arise from the main stack (with the pollutants of concern being oxides of nitrogen and particulate) and from the two de-dusting stacks which emit particulate. These emissions and other emission parameters for these sources are listed in **Table 2-1**. For the Balmoral south project, the pellet plant is the largest source of NO_x emitting 86% of the proposals emissions. This is due to the assumed high NO_x concentrations of 400mg/m³ as obtained from the Austeel proposal and the large volume of air released through this large diameter stack;
- The DRI plant with atmospheric emissions from the main stack emitting combustion products (oxides of nitrogen, sulphur dioxide and particulate) and the de-dusting stacks which emit particulate only; and
- Power station consisting of units to generate up to 243 MW. At the time of the study, the configuration had not been decided with a likely turbine, the open cycle Trent 60 DLE gas turbine used for modelling. As a conservative measure, seven turbines have been modelled at full load for the full year. Seven turbines will only be required for very high temperatures, above 45 degrees C, with only five turbines required for temperatures at around 20 degrees C. A greater number of turbines are required for the high temperatures as the turbines are not as efficient at these temperatures. Pollutants of concern from the gas fired power station are primarily NO_x, with small amounts of SO₂, CO and particulate emitted. In recent times, concern has been expressed as to emissions of formaldehyde and other hazardous air pollutants. These are not assessed here as the emissions of these substances from large gas fired turbines at or near base load are small. These pollutants were assessed for the Kemerton Power Station power station (similar large gas turbines) and found to

contribute a minor fraction of their respective criteria. It is noted that for the Mineralogy proposal, the EPA recommended a combined cycle power station primarily to reduce greenhouse emissions, though also because of its higher energy efficiency this would reduce gas consumption and therefore lessen NO_x emissions.

Table 2-1 Balmoral South Emissions

Stack	Easting	Northing	Stack Height	Stack Diameter	Volume (wet)	Emission Temp	Volume at exit temp.	Exit velocity	SO ₂	NO _x	Dust	Volume dry	SO ₂	NO _x	Dust
	(m)	(m)	(m)	(m)	(Nm ³ /hr)	(C)	(m ³ /s)	(m/s)	(mg/Nm ³)	(mg/Nm ³)	(mg/Nm ³)	(Nm ³ /s)	(g/s)	(g/s)	(g/s)
One Pellet Plant (7 Mtpa)															
Main Stack A	411,670	7,665,325	60	8.25	2,288,000	140	961	18	40	400	50	578.4	23.13	231.3	28.92
Feed Dedusting A	411,660	7,665,250	20	1.00	46,800	58	16	20	0	0	50	11.8	0	0	0.59
Discharge Dedusting A	411,870	7,665,200	20	1.38	93,600	40	30	20	0	0	50	23.7	0	0	1.18
Discharge Dedusting B	411,870	7,665,200	20	1.38	93,600	40	30	20	0	0	50	23.7	0	0	1.18
Screen Dedusting A	411,880	7,665,210	20	1.38	93,600	40	30	20	0	0	50	23.7	0	0	1.18
One HBI Plant (1.45 Mtpa HBI)															
Main Stack	412,000	7,665,265	60	5.84	688,000	340	429	16	7	165	20	173.9	1.22	28.7	3.48
Hot DRI Dedusting	412,130	7,665,265	65	1.58	120,000	50	39	20	0	0	40	30.3	0	0	1.21
Oxide Handling Dedusting	412,150	7,665,200	65	0.59	16,667	50	5.3	20	0	0	40	4.2	0	0	0.17
Briquetting Dedusting	412,163	7,665,220	65	0.59	16,667	50	5.3	20	0	0	40	4.2	0	0	0.17
Passivation Bin Dedusting	412,130	7,665,180	25	0.59	16,667	50	5.3	20	0	0	40	4.2	0	0	0.17
Power Station (7 open Cycle, Total)															
Unit 1 - Trent 60 DLE	411,894	7,665,840	15	3.00	414,852	456	308	44.1	0	47.6	0	106.1	0	4.94	0
Unit 2 - Trent 60 DLE	411,920	7,665,830	15	3.00	414,852	456	308	44.1	0	47.6	0	106.1	0	4.94	0
Unit 3 - Trent 60 DLE	411,946	7,665,820	15	3.00	414,852	456	308	44.1	0	47.6	0	106.1	0	4.94	0
Unit 4 - Trent 60 DLE	411,972	7,665,810	15	3.00	414,852	456	308	44.1	0	47.6	0	106.1	0	4.94	0
Unit 5 - Trent 60 DLE	411,998	7,665,800	15	3.00	414,852	456	308	44.1	0	47.6	0	106.1	0	4.94	0
Unit 6 - Trent 60 DLE	412,024	7,665,790	15	3.00	414,852	456	308	44.1	0	47.6	0	106.1	0	4.94	0
Unit 7 - Trent 60 DLE	412,050	7,665,780	15	3.00	414,852	456	308	44.1	0	47.6	0	106.1	0	4.94	0
Total Balmoral South													24.35	294.7	38.25

Notes:

- 1) Pellet plant and DRI emissions scaled from the Mineralogy SER data. The 7 Mtpa plant using a 6.9 Mtpa plant data in Mineralogy, with the 1.45 Mtpa assumed to have the emissions of a 1.57 Mtpa plant in mineralogy. The common dedusting system has been assumed 1/3 of the Mineralogy common de-dusting system
- 2) Power station emissions are for from as provided by Promet (2006) with eight TRENT 60 DLE turbines installed, with seven operating. The turbines are proposed with evaporative cooling with the emissions based on this which has 12% higher emissions, and 11% higher mass flow than and should result in similar ground level concentrations. Emissions are for ambient conditions of 34 deg C and 24% relative humidity.

Table 2-2 Emission Parameters for Mineralogy from HGM (2002)

Stack	Easting	Northing	Stack Height	Stack Diameter	Volume (wet)	Emission Temp	Volume at exit temp.	Exit velocity	SO ₂	NO _x	Dust	Volume dry	SO ₂	NO _x	Dust
	(m)	(m)	(m)	(m)	(Nm ³ /hr)	(C)	(m ³ /s)	(m/s)	(mg/Nm ³)	(mg/Nm ³)	(mg/Nm ³)	(Nm ³ /s)	(g/s)	(g/s)	(g/s)
Two Pellet Plants (Total 13.8 Mtpa of pellets)															
Main Stack A	413,061	7,671,800	60	8.25	2,288,000	140	961	18.0	40	400	50	578.4	23.13	231.3	28.92
Feed Dedusting A	413,125	7,671,782	20	1.00	46,800	58	16	20.0	0	0	50	11.8	0	0	0.59
Discharge Dedusting A1	413,137	7,671,955	20	1.38	93,600	40	30	20.0	0	0	50	23.7	0	0	1.18
Discharge Dedusting A2	413,137	7,671,955	20	1.38	93,600	40	30	20.0	0	0	50	23.7	0	0	1.18
Screen Dedusting A	413,167	7,671,971	20	1.38	93,600	40	30	20.0	0	0	50	23.7	0	0	1.18
Main Stack B	413,061	7,671,800	60	8.25	2,288,000	140	961	18.0	40	400	50	578.4	23.13	231.3	28.92
Feed Dedusting B	413,125	7,671,782	20	1.00	46,800	58	16	20.0	0	0	50	11.8	0	0	0.59
Discharge Dedusting B1	413,137	7,671,955	20	1.38	93,600	40	30	20.0	0	0	50	23.7	0	0	1.18
Discharge Dedusting B2	413,137	7,671,955	20	1.38	93,600	40	30	20.0	0	0	50	23.7	0	0	1.18
Screen Dedusting B	413,167	7,671,971	20	1.38	93,600	40	30	20.0	0	0	50	23.7	0	0	1.18
Three DRI Plants (Total 4.7 Mtpa of HBI)															
Main Stack A	413,068	7,672,120	60	5.84	688,000	340	429	16.0	7	165	20	173.9	1.22	28.7	3.48
Main Stack B	413,145	7,672,103	60	5.84	688,000	340	429	16.0	7	165	20	173.9	1.22	28.7	3.48
Main Stack C	413,252	7,672,079	60	5.84	688,000	340	429	16.0	7	165	20	173.9	1.22	28.7	3.48
Hot DRI Dedusting A	413,071	7,672,264	65	1.58	120,000	50	39	20.0	0	0	40	30.3	0	0	1.21
Hot DRI Dedusting B	413,149	7,672,246	65	1.58	120,000	50	39	20.0	0	0	40	30.3	0	0	1.21
Hot DRI Dedusting C	413,255	7,672,223	65	1.58	120,000	50	39	20.0	0	0	40	30.3	0	0	1.21
Oxide Handling Dedusting	413,179	7,672,223	65	1.02	50,000	50	16	20.0	0	0	40	12.6	0	0	0.51
Briquetting Dedusting	413,292	7,672,200	65	1.02	50,000	50	16	20.0	0	0	40	12.6	0	0	0.51
Passivation Bin Dedusting	413,266	7,671,992	25	1.02	50,000	50	16	20.0	0	0	40	12.6	0	0	0.51
Power Station (4 open Cycle, Total 640MW)															
Unit 1 - 160MW	412,720	7,672,700	40	5.80	1,473,082	540	1219	46.1	0	51.3	0	379.4	0	19.47	0
Unit 2 - 160MW	412,720	7,672,700	40	5.80	1,473,082	540	1219	46.1	0	51.3	0	379.4	0	19.47	0
Unit 3 - 160MW	412,720	7,672,700	40	5.80	1,473,082	540	1219	46.1	0	51.3	0	379.4	0	19.47	0
Unit 4 - 160MW	412,748	7,672,700	40	5.80	1,473,082	540	1219	46.1	0	51.3	0	379.4	0	19.47	0
Total Mineralogy													49.92	626.7	81.7

For completeness, the Mineralogy emissions as per their SER are also presented in **Table 2-2**. Based on this data, total emissions from both proposals of SO₂, NO_x and PM (from controlled sources) are 74.3 g/s, 921 g/s and 120 g/s respectively, of which the Balmoral South proposal contributes 33%, 32 % and 32%.

2.2 Speciation and Reactivity of Particulate

Data of the metal composition of the DRI plant is listed in **Table 2-3** as provided in the EPA bulletin for the Mineralogy project.

Table 2-3 Speciation of Dust from DRI Plant

Source	Fe ₂ O ₃	SiO ₂	Al ₂ O ₃	CaO	NgO	P	S	Na ₂ O	K	Mn	TiO ₂	V	Cu	C
Dust Collection	97.1	1.45	0.06	0.53	0.47	0.005	0.01	0.001	0.005	0.02	<0.001	0.01	<0.001	negl
Main Stack	48.5	0.73	0.03	0.27	0.24	0.003	0.005	0.001	0.003	0.01	<0.001	0.005	<0.001	~50

Note: Dust collection includes charge hopper and briquette dust collection stacks source (EPA, 2002)

Table 2-3 indicates that the composition of dust from the dust collection stacks is that of iron ore as the DRI process does not add any additional metals. The metal composition of the main stack has a similar composition, though with metal concentrations approximately half that due to an approximate equal quantity of carbon in the particulate. As such, in terms of the metals in the stack dust emissions, there should be no difference to that of iron ore dust.

For DRI dust however, there is concern due to its potentially reactive nature, particularly in the presence of moisture. The EPA bulletin stated DRI *“has caused safety problems in confined spaces with high moisture levels, such as during ocean transport. This reactivity can be reduced by stabilisation via hot briquetting (which reduces the surface area) or via passivation, where part of the DRI is oxidised (to create an insulation effect). However, there is still potential for process areas and materials handling to produce reactive DRI dust. DRI dust is known to cause health problems (eye damage) and damage to property (paint coatings). Because of this, the EPA believes that DRI dust needs to be treated more cautiously than iron ore dust and emissions must be required to meet best practice: (EPA, 2002).*

2.3 Greenhouse Emissions

It is noted that a major atmospheric emission from combustion of fuels is the release of carbon dioxide, which is significant because of its role in the enhanced greenhouse affect. This impact is not covered within this study, which addresses the local air quality impacts only.

2.4 Emissions from Balmoral South – Non Routine Operation

Non routine operations for industrial projects typically occur during start-ups, shutdowns, stoppages, maintenance periods and power failures. In the Mineralogy PER, it was indicated that during upset

conditions the emissions from the MIDREX plant actually decrease, with the only increase being during transient conditions when emissions increase for a few minutes at a time, resulting in a monthly average increase of less than 0.07% (EPA, 2002, page 31). This percentage variation in emissions over a month will understate the true change in emissions when the upset is occurring. With no data on this variation on the short time scale, non routine emissions have been neglected for this assessment.

2.5 Other Significant Sources of Atmospheric Emissions in the Area

Other possible sources of air emissions in the Shire of Roebourne that may affect the air quality in the area are listed in **Table 2-4**.

Table 2-4 Major Air Emission Sources in the Shire of Roebourne in 2004/2005

Source	Emissions	Total Emissions (tonne/year)				
		CO	NO _x	SO ₂	VOC	PM ₁₀
Industrial Sources						
Cape Lambert Power Station	Emissions from gas fired boilers including NO _x and minor amounts of SO _x , PM and VOCs	89	370	1.6	6.9	9.2
HI Dampier Power Station	Emissions from gas fired boilers which will include, NO _x and minor amounts of SO _x , PM and VOCs	110	450	1.9	8.4	11
Woodside – Karratha Onshore Gas Treatment Plant	Emissions from gas fired turbines, compressors, flaring, and ship loading. NO _x , PM, VOCs including BTEX	2,500	12,000	3.9	33,000	180
Radio Hill Mine		-	14	0.59	1.1	67
Dampier Salt		31	76	7.2	6.7	15
Alinta Compressor (Mardie)		61.8	124	2.0	0.18	2.0
Other man made Sources						
Commercial shipping total		520	2,100	1,100	530	220
Motor vehicles		870	190	22	120	8.1
Unpaved Road Dust		0	0	0	0	10,000
Railways in the region		110	860	38	37	20
Recreational Boating		320	14	1	92	1
Fugitive Sources						
Wind erosion from bare areas		0	0	0	0	48,000
Wildfires		120,000	9,400	-	7,200	15,000
Biogenic (soil and vegetation)		-	3,000	-	59,000	-
Total 2004/2005		130,000	29,000	1,200	100,000	85,000
Burrup Fertilisers To start in 2005/2006		Not given	527	0.6	negl	negl

Notes:

1. From NPI Website <http://www.npi.gov.au/> except from shipping for the individual Cape Lambert areas which is from SKM (2003).
2. Values greater than 10% of the total bolded.
3. Burrup Fertilisers from EPA (2004).

Table 2-4 indicates that the nearest other source is the Mardie compressor station, located south of Mardie station. This emits 124 tonnes per annum or on average 3.9 g/s of NO_x. As this is approximately 40km distant and a small source, it should have negligible impact in the Cape Preston area. Other larger sources that should have a greater, though low impact are the industry on the Burrup Peninsula, particularly the Woodside onshore treatment plant.

3 Ambient and Emission Criteria

The WA EPA have at present no state wide standards for ambient pollutant concentrations and have no standards or guidelines on emission limits as per other Australian States. The EPA “thinking” on acceptable emissions and ambient concentrations are contained in the guidance statement “*Implementing Best Practice in proposals submitted to the Environmental Impact Assessment process*” (EPA, 2003). This statement provides guidance on what the EPA means by “best practice in the EIA process” with the thrust of the statement, that new proposals are “required” to demonstrate that:

- “All relevant environmental quality standards must be met;
- Common pollutants should be controlled by proponents adopting Best Practicable Measures (BPM);
- Hazardous pollutants (like dioxins) should be controlled to the Maximum Extent Achievable (MEA), which involves the most stringent measures available. For a small number of very hazardous and toxic pollutants, costs are not taken into account.
- There is a responsibility for proponents not only to minimise adverse impacts, but also to consider improving the environment through rehabilitation and offsets where practicable” (EPA, 2003).

The document defines:

“Best Practicable Measures incorporates technology and environmental management procedures which are practicable, having regard to, among other things, local conditions and circumstances, including costs, and to the current state of technical knowledge, including the availability of reliable, proven technology.”

“Maximum Extent Achievable requirements incorporate technology which are the most stringent measures available and achievable, at a scale relevant to the proposal, to control the level of risk imposed by the hazardous pollutants being considered.” “Maximum Extent Achievable measures are only intended to cover hazardous pollutants as described above and set out in the schedule of Class 4 substances attached to the Victorian EPA’s Environment Protection Policy for Air Quality Management (Victoria Govt Gazette, 2001). They are not intended to apply at pollutant levels which do not pose credible risk.”

3.1 Ambient Criteria - Health

For ambient ground level concentrations, the WA EPA does not have State-wide standards, but are in the process of implementing a Statewide Environmental Protection Policy. This policy would likely apply National Environmental Protection Measure (NEPM) Standards throughout the state, where current Environmental Protection Policies do not exist. It is understood that the NEPM will apply at residential areas or places where people may congregate, such as beaches or picnic areas. The NEPM standards are listed in **Table 3-1**.

Table 3-1 National Environmental Protection Measure - Air Quality Standards and Goals

Pollutant	Averaging Period	Maximum Concentration		Goal
		(ppm)	(µg/m ³)	
				Maximum allowable exceedances within 10 years
Carbon Monoxide	8-hour	9.0	11,240	1 day a year
Nitrogen Dioxide	1-hour	0.12	246	1 day a year
	1-year	0.03	62	none
Photochemical Oxidants (as ozone)	1-hour	0.10	214	1 day a year
	4-hours	0.08	171	1 day a year
Sulfur Dioxide	1-hour	0.20	572	1 day a year
	1-day	0.08	228	1 day a year
	1-year	0.02	57	none
Lead	1-year	-	0.5	none
Particles as PM ₁₀	1-day	-	50	5 days a year
Advisory Reporting Standards and Goal				
Particles as PM _{2.5}	1-day	-	25 µg/m ³	Goal is to gather sufficient data nationally to facilitate a review of the advisory Reporting standard as part of the review of this Measure scheduled to commence in 2005
	1-year	-	8 µg/m ³	

Notes:

- 1) Concentrations of gaseous pollutants in italics have been converted from the NEPM standard quoted at 0 deg C and 101.3kPa.

In WA these criteria are usually applied at nearby residences or places where the public may congregate. As such, they can be considered to apply to public camping grounds and nearest homesteads, such as Mardie. At the work camps they could be considered to apply, but it is noted that there should not be any sensitive sub population groups such as infants, elderly or those with severe asthma for which these criteria were primarily developed.

3.2 Ambient Criteria - Vegetation

For assessing the potential impacts on vegetation, as there are no guidelines/standard for the pollutants of concern SO₂ and NO_x, the WHO air quality guidelines for Europe (WHO, 2000) have been used. These are considered applicable outside the lease area and are listed in **Table 3.2**

Table 3.2 World Health Organisation Air Quality Guidelines for Europe (WHO, 2000)

Pollutant	Vegetation Category	Guideline (µg/m ³)	Time Period
Sulfur Dioxide	Agricultural Crops	30	Annual and winter mean
	Forests and Native Vegetation	20	Annual and winter mean
	Lichens	10	Annual mean
Oxides of Nitrogen	All Vegetation	75	24-hour
	All vegetation	30	Annual mean

Note: Concentrations are expressed at 0° C and 101.3 kPa.

3.3 Comparison to Emission Criteria

Within WA, the EPA “require that all reasonable and practicable means should be used to prevent and minimise the discharge of waste” (EPA, 1999a). For the definition of what is reasonable and practicable the EPA released guidance in 1999 for large open cycle gas turbines burning natural gas, which consider that the adoption of dry low NO_x burner technology was best practice (EPA, 1999a). For other sources, the WA EPA have not provided guidance, with proposals generally adopting other states regulations or the National Health and Medical Council guidelines (AEC/NHMRC, 1986).

In the Austeel proposal, initially conducted in 2000, the 1986 AEC/NHMRC guidelines were adopted along with the WA EPA guidance for low NO_x burners. Since 2000, a number of regulators have updated their guidelines with NSW recently adopting what are generally the most stringent guidelines within Australia for new proposals (NSW, 2005). For comparison to the proposed emissions, the AEC/NHMRC and new NSW guidelines applicable to this project are presented in **Table 3.3**.

Table 3.3 AEC/NHMRC(1986) and new NSW (2005) Emission Guidelines

Pollutant	AEC/NHMRC		NSW EPA		Proposed Emissions from AR (mg/m ³)
	(mg/m ³)	Application	(mg/m ³)	Application	
Solid Particles	100		50	Iron and steel primary production. Fuel burning equipment, sinter plants kiln, power generating and furnace	20 – 50
	250		20	Crushing grinding separating or materials handling activity	40 - 50
Sulphur Dioxide	250	Fuel burning equipment			0 – 40
Oxides of Nitrogen	70	Gas turbines > 10MW	70	(>30 MW gas fired)	47.6
	350	Gas fired boilers (used in the 2000 assessment of the Pellet plant)	500	Fuel burning equipment, sinter plants kiln, power generating and furnace	165 – 400

Note: Concentrations are expressed at 0° C and 101.3 kPa.

Comparison with the emissions in **Table 3.3** indicates that the NO_x emissions from the pellet plant and DRI plant meet the newer NSW guidelines for Iron and Steel (Primary production) of 500 mg/m³. It is noted that the Pellet Plant exceeds slightly the guideline of 350 mg/m³ adopted in the 2000 assessment, though it is noted that this guideline is not really applicable to this industry. Though meeting the NSW guidelines, it is noted that the EPA recommended a condition for Austeel requiring the proponent investigate and report on best practice NO_x control and measures to reduce NO_x emissions from the pellet plant. This is especially the case given that the 1998 Mid West Iron and Steel project proposed

emissions of NO_x of only 200 mg/m³. As such, as per the recommendations for Austeel, it is considered that an analysis of best practice with regards to NO_x emissions from pellet plants should be undertaken.

For the power station with dry low NO_x burners, the NO_x emissions of 47.6 mg/m³ will meet the EPA guidelines (25ppm or approximately 51 mg/m³) for new gas fired power stations.

For particulate, the proposed emissions meet the older AEC/NHMRC guidelines of 250 mg/m³ for material handling as used in Austeel, but do not meet the much more stringent NSW guidelines (20 mg/m³). It is noted that the NSW guidelines are considered by some to be over stringent and not readily achievable (Doig, 2006). As such it is considered that a limit of 50 mg/m³ which is line with fuel burning equipment for iron and steel plant in NSW is applicable. The exception to this may be any material handling with DRI where, given the reactivity issue of DRI dust, the NSW limits of 20 mg/m³ may be applicable.

4 Existing Air Pollutant Concentrations in the Region

Because of the remoteness of the site from sources, existing levels of SO₂ and NO₂ at Cape Lambert should be low. Evidence for this is provided in the very low monthly averages recorded at Mardie station as part of the Burrup rock art monitoring by CSIRO (2006). Of the other pollutants flagged, ozone levels will, at times, be moderate as indicated in the DEP monitoring at Dampier (DoE, 2004). Over the two years of monitoring, two events with 1-hour concentrations slightly exceeding 0.06ppm or 60% of the NEPM standard were recorded. These were due to bushfire smoke and as such, similar levels could be expected at Cape Preston.

Particulate levels either as TSP, PM₁₀ or PM_{2.5} can be high in the region due to natural sources such as bushfires and wind storms. Based on data collected by BHP Billiton at their background monitor at Boodarie and Port Hedland airport (BHP Billiton, 2002 and BHP Billiton, 2006) the number of exceedances of:

- TSP (24-hour average 260 µg/m³ level) can vary between typically zero occurrences per year to on occasions two per year due to dust storms; and
- PM₁₀ (24-hour average 50 µg/m³ level, the NEPM standard with a goal of no more than 5 exceedances) can vary between zero per year to 46 per year on an annualised basis. The highest number of exceedances occurred for 2000 which had significant amount of smoke from fires in the Pilbara, as discussed in DoE (2004). Zero exceedances occurred for 1996 from sampling for only 8 months of the year, hence probably understating the true value a little.

5 Modelling Methodology

5.1 AERMOD Model Set Up

Atmospheric emissions may have both local and regional impacts. For local impacts, with stacks in the range of 15 to 65m and generally very buoyant plumes, the following dispersion processes are considered important:

- Potential plume downwash of the plume by the turbulent eddies that develop when air flows over and around nearby tall buildings. If the plume is emitted or is caught in such an eddy, it can be brought to ground much sooner than would otherwise occur, resulting in higher ground level concentrations;
- Convective dispersion. During the day time, the earth's heated surface will generate convective cells of rising and descending air which can also bring elevated plumes to the ground more quickly than otherwise would occur;
- Proximity to the coast. The coast is 12 km to the northwest for Balmoral south and 6km for the Mineralogy project. This will result in the presence of a temperature inversion (thermal internal boundary layer) at a height in the range of 100 to 500m above the ground for onshore flows. At this distance downwind and for the stacks proposed, the inversion will tend to act as a lid on the plume, which may lead to higher concentrations than would occur for a more inland site;
- The presence of relatively low hills, approximately 100 m above plant base around 5 km to the east. This may lead to higher concentrations on the hills than would occur for flat terrain; and
- With the large quantity of NO_x emitted the potential for photochemical smog formation as already occurs to some degree in the Dampier Karratha area.

In the 2000 and 2002 assessment, to address these issues both local modelling and regional photochemical modelling was undertaken. For local modelling, the USEPA regulatory model at the time, ISC3Prime was used. Since then the USEPA have replaced this model with a newer improved model AERMOD, which can more realistically model convective dispersion and plume impacts on hills. ISC3Prime and the similar model, AUSPLUME have both been shown to over-predict concentrations on hills from stacks.

Other models considered for predicting concentrations were:

- TAPM, which was discounted due to the long run times required for the large number of sources here;
- AUSPLUME (v6). This was discounted as it cannot model convective dispersion for stacks less than 100m; and
- CALPUFF (v6). This was considered as an alternative to AERMOD, with AERMOD used in this project as in the US, AERMOD would be the preferred model for this situation.

5.2 AERMOD Model Set Up

The following set up options for AERMOD were used:

- Building downwash was included using the PRIME algorithms with site buildings as used in the Austeel modelling;
- A 500m grid over a 22 by 27 km area centred on the site. That is 45 by 55 grid points;
- Inclusion of terrain;
- Meteorological files produced by the model TAPM for the year 1999; and
- No chemical transformation or deposition, except for the prediction of NO₂ as discussed below.

A typical AERMOD input file is presented in **Appendix A**.

5.3 Meteorological Data

Meteorological data for AERMOD was obtained from the model TAPM for the year 1999. TAPM was used as it can readily derive a file suitable for AERMOD with the required heat fluxes and friction velocities. The meteorological data used in the 2000 and 2002 Mineralogy assessments from Karratha, did not include these parameters, being only in format required for ISC3Prime or AUSPLUME. It is noted that on-site meteorological data is now being collected with this monitoring commencing in late August 2006. At the time of modelling for the initial report (late December 2006), only 6 weeks of wind data was available due to issues with data loss. As such, this data could not be considered for use in modelling. For the revised modelling in early April 2007 with the increased number of gas turbines, there was insufficient time to create and validate an AERMOD file from local data, with the 6 months of useable data at this stage also not sufficient to create a 12 month data file.

For the development of the meteorological file for AERMOD, TAPM was run using 25, 10, and 3 km grids with 31 by 31 grid points in the north/south and east/west directions. The landuse within TAPM was defined as class 17 (grassland very sparse hummock), soil as duplex sandy clay loam with the soil moisture varied from 0.07 (August to January) to 0.12 (from March to May).

The observed wind rose from Karratha for this period and that predicted by TAPM are presented in **Figure 5.1** and **Figure 5.2**. These show some differences, particularly a tendency for TAPM to predict lower wind speeds. This is thought to be due to TAPM specifying a higher surface roughness for this area than actually exists. The wind rose predicted by TAPM at the site at Cape Preston and as used in the modelling is presented in **Figure 5.3**. This shows more easterly winds and southerlies than occur at Karratha, possibly due to the influence of the range of hills to the east of the site.

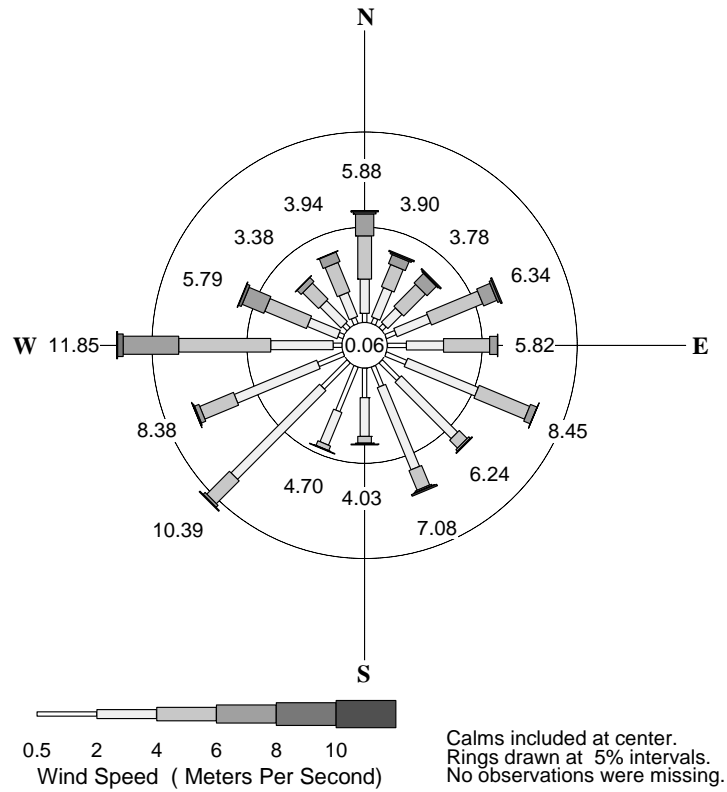


Figure 5.1 Observed wind rose at the DEC Karratha Site for 1999

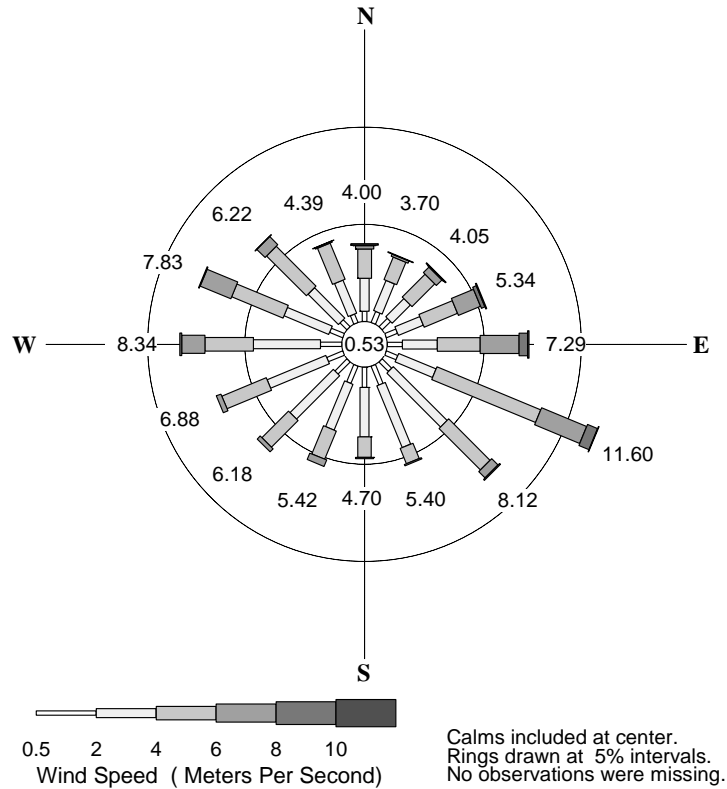


Figure 5.2 TAPM Predicted wind rose at the DEC Karratha Site for 1999

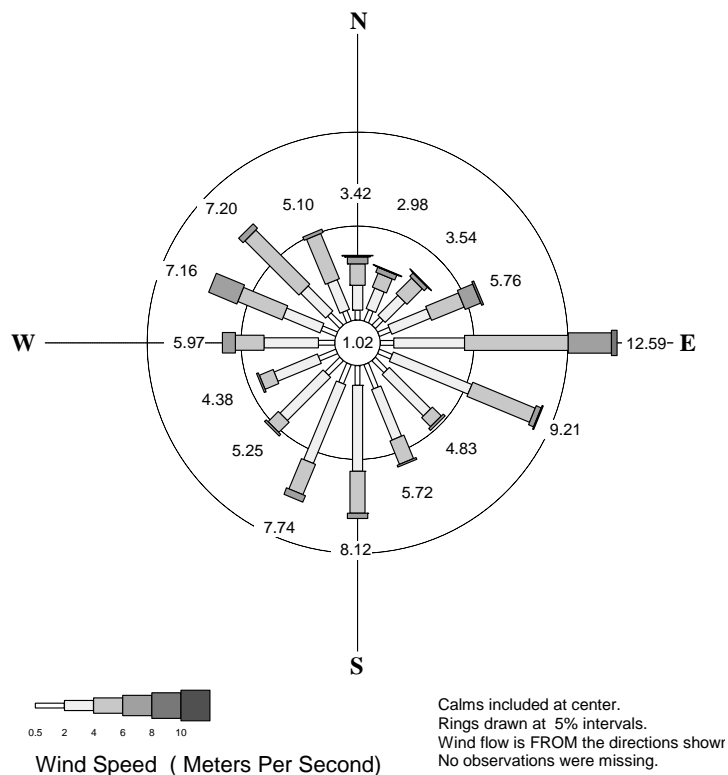


Figure 5.3 TAPM Predicted wind rose at the Cape Preston Site for 1999

5.4 Proportion of NO_x in the form of NO₂

To estimate the proportion of NO_x in the form of NO₂ (the species of concern to human health), a NO to NO₂ relationship is required. One method that is commonly adopted is to use the ozone limiting method (OLM) as developed by Cole and Sumerhays (1979) and as specified by the USEPA and the NSW modelling regulations (NSW, 2005). The OLM estimates the NO₂ concentrations as:

$$[\text{NO}_2]_{\text{total}} = K \times [\text{NO}_2]_{\text{pred}} + \min\{(0.9 \times [\text{NO}_x]_{\text{pred}} \text{ or } (46/48) \times [\text{O}_3]_{\text{bkgd}}\} + [\text{NO}_2]_{\text{bkgd}} \quad \text{Eq 5.1}$$

Where:

- [NO_x] is the predicted NO_x concentration in µg/m³,
- [O₃] is the measured ozone concentration in µg/m³,
- NO₂ is the NO₂ concentrations in µg/m³, and
- “pred” refers to predictions and “bkgd” refers to measured background concentrations

- K is a coefficient, with typical value of 0.1 used because NO_x emissions from combustion sources are typically less than 10%. For dry low NO_x turbines however, values of 33% have been reported for loads greater than 80%.

For background values for use with the OLM, hourly data can be used, or as an approximation a typical conservative concentration.

With the uncertainty in the NO to NO₂ conversion and considering that this may vary for different sources, as an alternative to the OLM, the empirical relationship derived from data at Dampier in SKM (2001) and used in the Austeel 2002 assessment (SKM, 2002) and Gorgon Assessment (SKM, 2005) has been used. The study by SKM (2001) determined a conservative estimate of the conversion of NO to NO₂ to be:

$$[\text{NO}_2] = 14.39 + 0.30 \cdot x \cdot [\text{NO}_x] \quad \text{NO}_x > 20.56 \mu\text{g}/\text{m}^3 \quad \text{Eq 5.2}$$

$$[\text{NO}_2] = [\text{NO}_x] \quad \text{NO}_x < 20.56 \mu\text{g}/\text{m}^3 \quad \text{Eq 5.3}$$

For NO₂ to NO_x ratios below 0.2, which is the expected upper limit for the composite emissions from the project, **Equations 5.2** and **5.3** will predict higher NO₂ concentrations than that from **Equation 5.1** and as such will be conservative.

5.5 Background Concentrations used in Modelling

For determining cumulative concentrations from proposed sources and the existing background concentrations, the Victorian EPA (Victoria Government Gazette, 2001) recommend the use of the 70th percentile measured concentration as the background value. The NSW EPA modelling guidelines (NSW EPA, 2005) have a two tiered approach and recommend the use of the maximum background concentration for level 1 (screening assessments), whilst for level 2 assessments, recommending the addition of hourly observations to hourly predicted concentrations. For this assessment, the 70th percentile concentration has been adopted for determining the background concentration.

Based on Dampier data, the 70th percentile 1-hour and annual average NO₂ concentrations are 4.2 μg/m³ and 2 μg/m³ respectively. As Dampier has a number of nearby and/or large sources (Woodside, HI power station and shipping) these concentrations are likely to be above true background 70th percentile concentrations.

Based on the available DEC PM₁₀ monitoring over 2 ½ years at Dampier from 1998 to 2000, the 70th percentile 24-hour PM₁₀ concentration is 22 μg/m³. This will overstate the true background PM₁₀ level as this site is near the Hamersley Iron training centre on the coast and is influenced by the Hamersley Iron operations. For SO₂, it is considered that background concentrations at Cape Preston will be negligible.

6 Predicted Concentrations

6.1 Concentrations from the Balmoral South plant Alone

Predicted concentrations of the pollutants (NO₂, PM₁₀, SO₂) as well as NO_x are presented in **Table 6-1**. Contour plots of the pollutants closest to the adopted criteria NO_x, NO₂ and PM₁₀ are also presented in **Figure 6.1** to **Figure 6.4**.

Table 6-1 Predicted Maximum Concentration from Balmoral South Alone

Pollutant	Averaging Period	Standard (µg/m ³)	Predicted Concentrations (µg/m ³)		Percentage of Standard or Guideline (%)
			Anywhere	Nearby Camps	Nearby Camps
Nitrogen Oxides	24-hour (max)	75	30.5	7	9
	Annual	30	4.1	0.45	1.5
Nitrogen Dioxide	1-hour (max)	<i>246</i>	108	40	16
	1-year	<i>62</i>	4.1	0.45	0.7
Sulphur Dioxide	1 hour (max)	<i>572</i>	29	9	1.6
	24-hour	<i>228</i>	2.9	0.6	0.3
	Annual	<i>57</i>	0.34	0.028	0.05
Particles as PM ₁₀	1-day (max)	-	84	6	-
	1-day (6th)	50	53	4	8

Notes:

- 1) Concentrations of gaseous pollutants in italics have been converted from the NEPM standard quoted at 0 deg C and 101.3kPa.
- 2) All criteria are for human health excepting nitrogen oxides which are for vegetation.
- 3) Both the health and vegetation standards are not applicable on the lease areas.
- 4) These concentrations exclude background concentrations.

The predicted concentrations show:

- Highest 24-hour and annual average NO_x and SO₂ concentrations occur within the first 500 to 1000m of the stacks and decrease rapidly with distance from the plant. Maximum 1-hour occur further away at 3 to 6 km from the plant. For PM₁₀ maximum 24-hour concentrations occur at the plant itself and decrease very rapidly with distance;
- The maximum 1-hour NO_x and NO₂ concentrations are predicted to occur for two conditions:
 - Early morning, low wind speeds (<2 m/s), with low mixing heights below 150m where the plume is trapped in a low inversion. This results in the high concentrations 3 to 6 km from the site; and
 - Moderate winds (5 to 6 m/s) during the day with mixing heights in the range of 500 to 1000m. This results in concentrations close in, within 500m of the stack. These concentrations appear to be due to moderate to weak convective conditions bringing the plume down to the ground. Model runs with and without the inclusion of building effects, had minor affect on these concentrations, indicating that the nearby buildings have negligible effect on the dispersion.

- At the nearby camps and camping grounds where the NEPM standards are considered to apply, the concentrations are at most 16% of the 1-hour NEPM NO₂ standard with the sixth highest PM₁₀ concentration being 8% of its respective standard; and
- Accounting for background concentrations, with 1-hour and annual concentrations for NO₂ of 4.2 µg/m³ and 2 µg/m³, the total cumulative concentration at the nearby camps is estimated at 44 µg/m³ and 2.45 µg/m³. These concentrations are only 18% and 4% of the NEPM NO₂ standards. For PM₁₀, taking a typical background concentration from Dampier of 22 µg/m³, the 6th highest concentrations at the nearest camp or camping ground would be 26 µg/m³ or 52% of the NEPM standard.

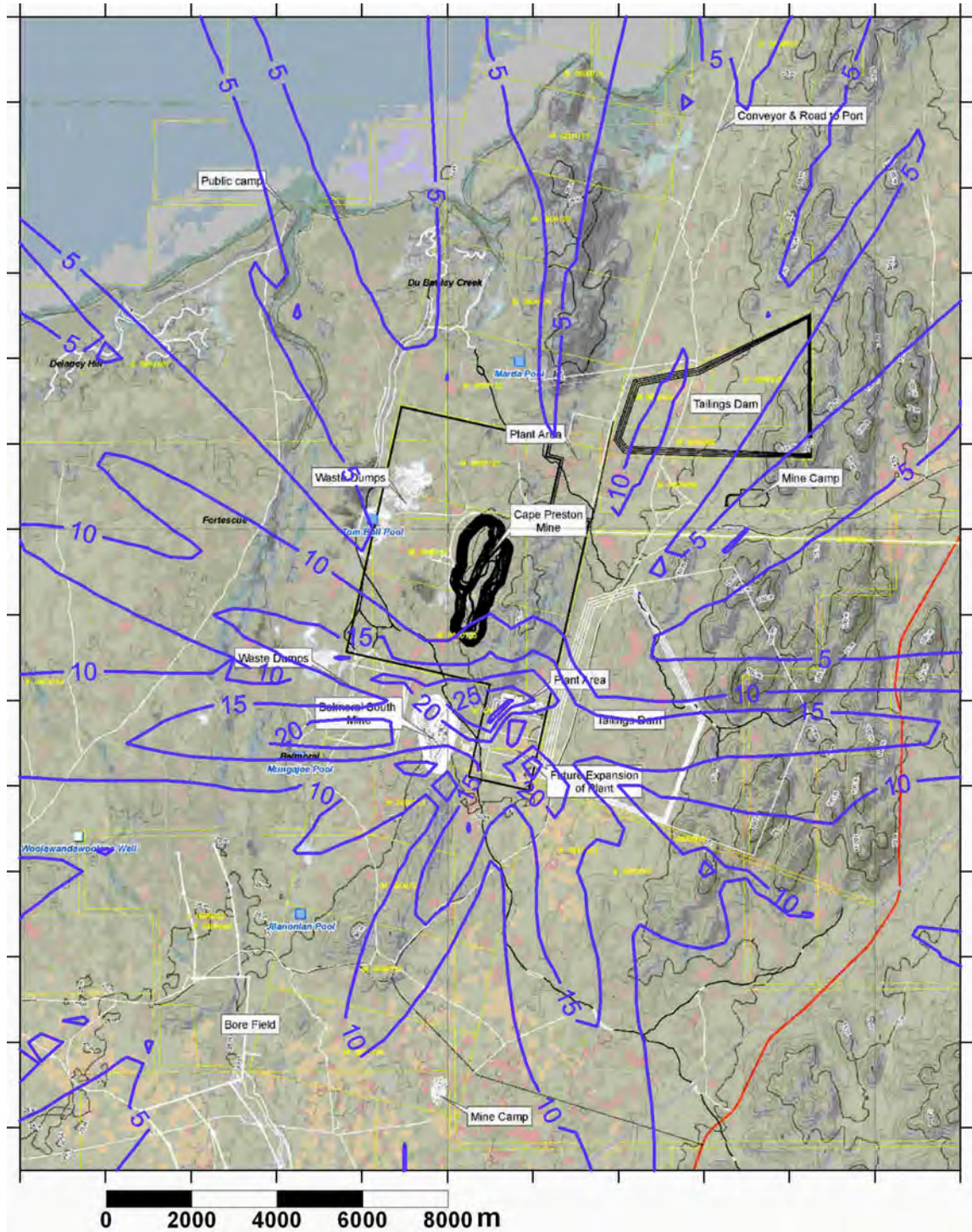


Figure 6.1 Predicted Maximum 24-hour NO_x Concentration (µg/m³) from Balmoral South

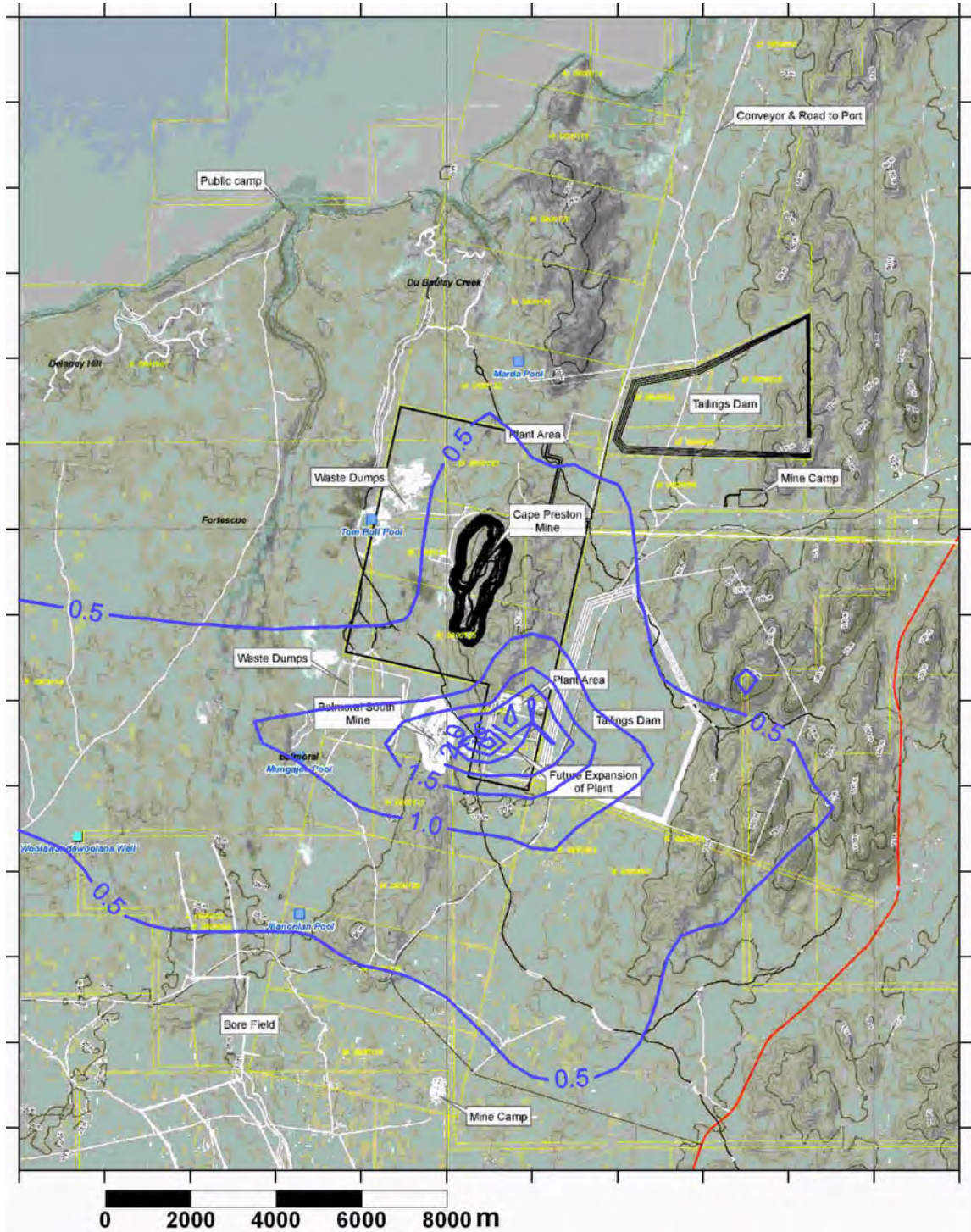


Figure 6.2 Predicted Annual Average NO_x Concentration (µg/m³) from Balmoral South

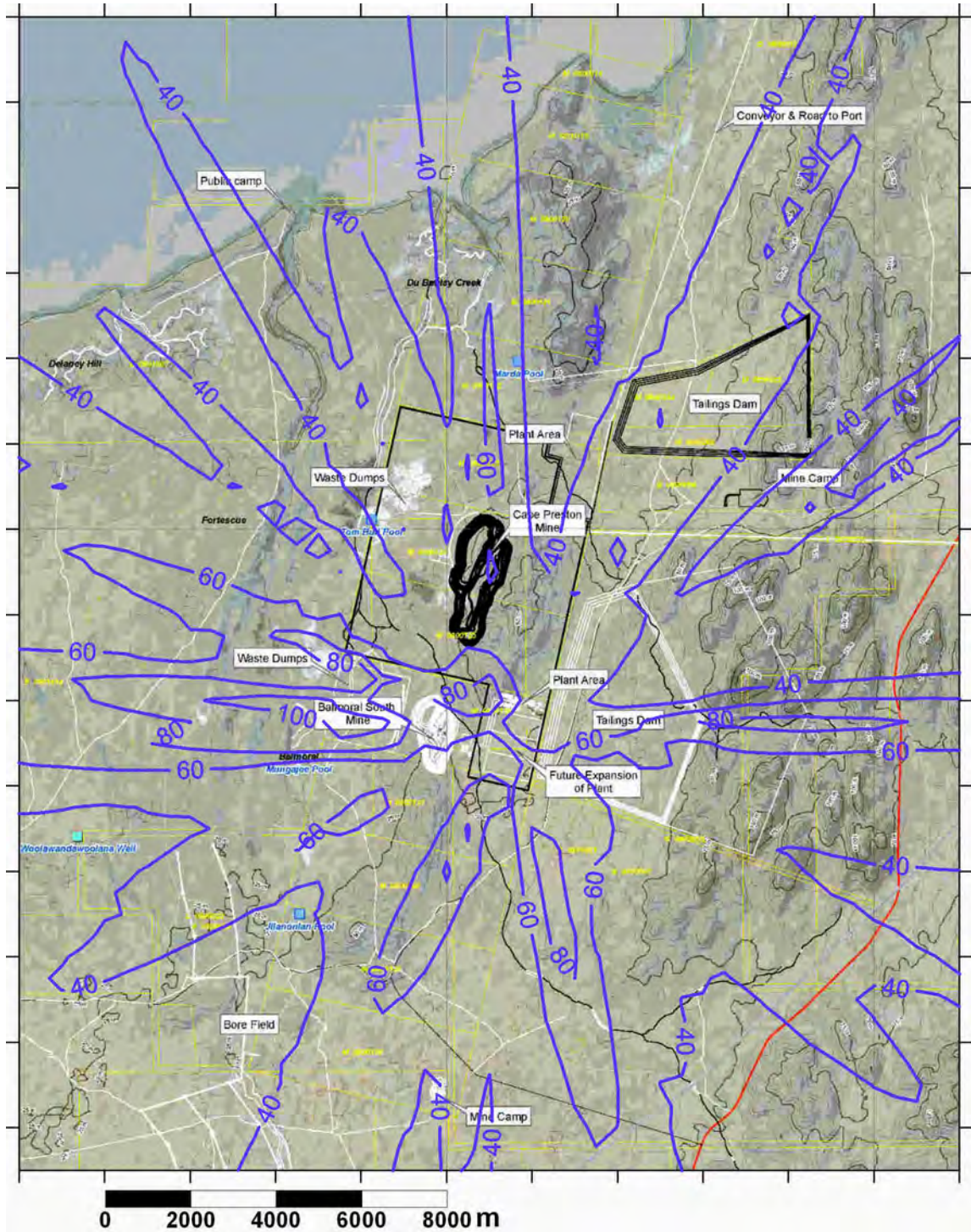


Figure 6.3 Predicted Maximum 1-hour NO₂ Concentration (µg/m³) from Balmoral South

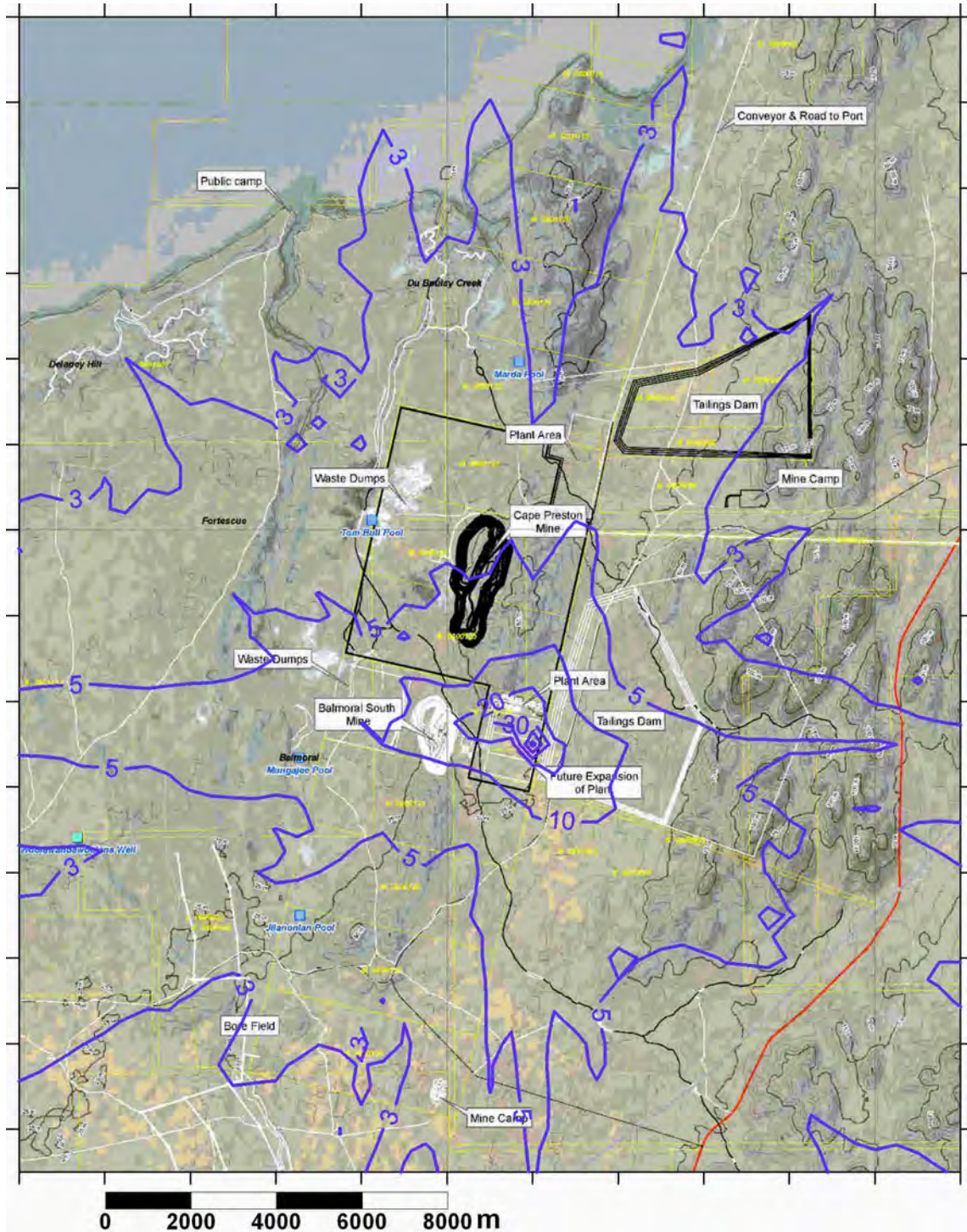


Figure 6.4 Predicted sixth 24-hour PM₁₀ Concentration (µg/m³) from Balmoral South

6.2 Cumulative Impacts from Balmoral South and Mineralogy

Predicted concentrations considering both the Balmoral south and Mineralogy projects are presented in **Table 6-2** and in **Figure 6.5** to **Figure 6.8**.

Table 6-2 Predicted Maximum Concentration from the Balmoral South and Mineralogy Projects

Pollutant	Averaging Period	Standard ($\mu\text{g}/\text{m}^3$)	Predicted Concentrations ($\mu\text{g}/\text{m}^3$)		Percentage of Standard or Guideline (%)
			Anywhere	Nearest Camps	Nearest Camps
Nitrogen Oxides	24-hour (max)	75	58	30	40
	Annual	30	8	2	7
Nitrogen Dioxide	1-hour (max)	246	190	130	53
	1-year	62	8	2	3.2
Sulphur Dioxide	1 hour (max)	572	55	42	7.3
	24-hour	228	5	3.2	1.4
	Annual	57	0.7	0.18	0.3
Particles as PM_{10}	1-day (max)	-	85	10	-
	1-day (6th)	50	54	5	10

Notes:

- 1) Concentrations of gaseous pollutants in italics have been converted from the NEPM standard quoted at 0 deg C and 101.3kPa.
- 2) All criteria are for human health excepting nitrogen oxides which is for vegetation.
- 3) Both the health and vegetation standards are not applicable on the lease areas.
- 4) The concentrations exclude background concentrations.

Table 6-2 and **Figure 6.5** to **Figure 6.8** indicate that:

- The larger Mineralogy project is the larger source of these pollutants and for the 1-hour and 24-hour averages is the primary contributor to the highest concentrations on the model grid (see **Figure 6.5** and **Figure 6.7**);
- At the nearby camps and camping grounds where the NEPM criteria are considered to apply, the concentrations are at most 10% of the 24-hour PM_{10} and 53% of the 1-hour NEPM NO_2 standards; and
- Considering background concentrations, the cumulative 1-hour and annual average NO_2 concentration at nearby camps are estimated at $134 \mu\text{g}/\text{m}^3$ and $4 \mu\text{g}/\text{m}^3$ respectively. These are 59% and 7% of the NEPM NO_2 standards. For PM_{10} , taking a typical background concentration from Dampier of $22 \mu\text{g}/\text{m}^3$, the 6th highest concentrations at the nearest camp or camping ground would be $32 \mu\text{g}/\text{m}^3$ or 64% of the NEPM standard.

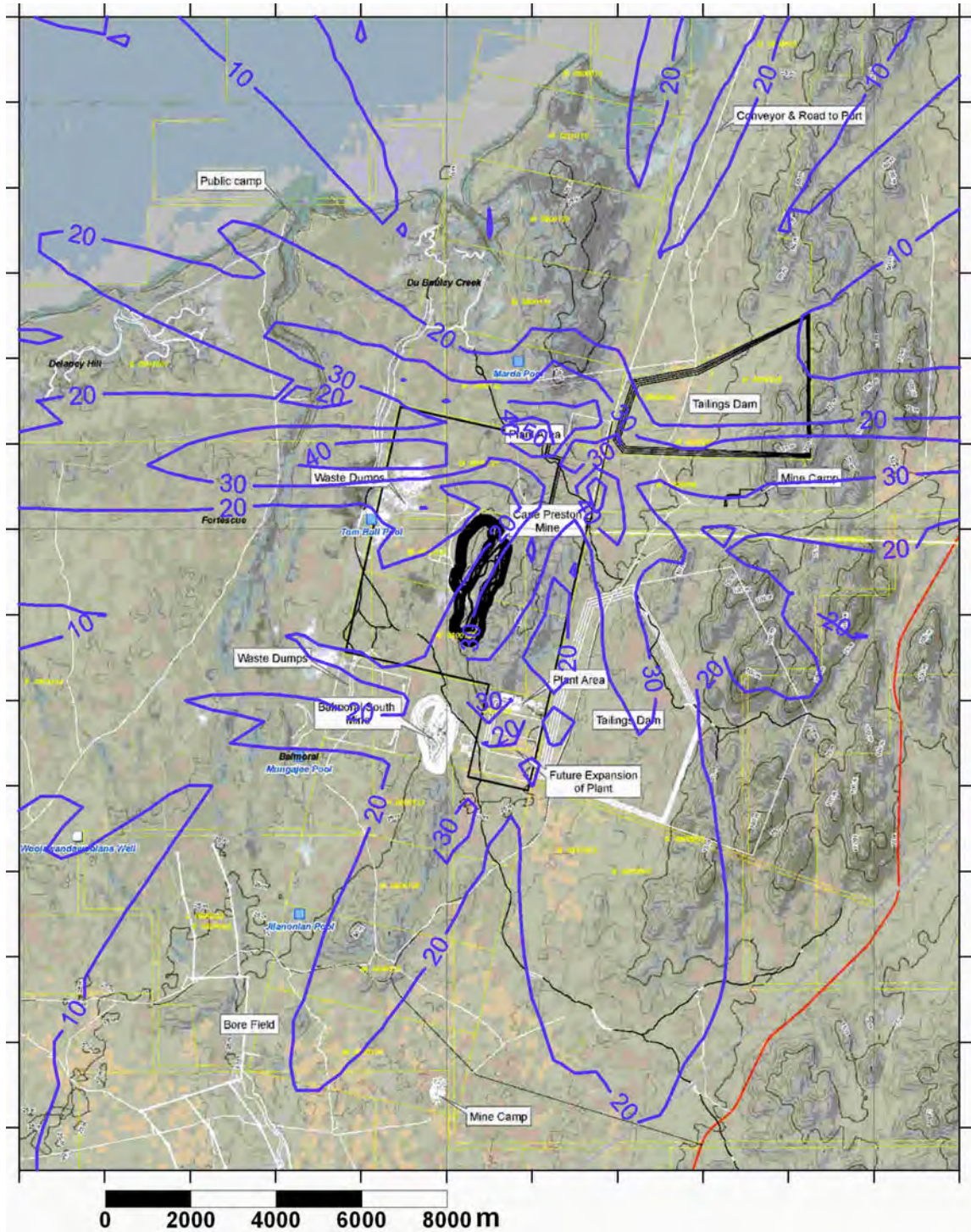


Figure 6.5 Predicted Maximum 24-hour NO_x Concentration (µg/m³) from Mineralogy and Balmoral South

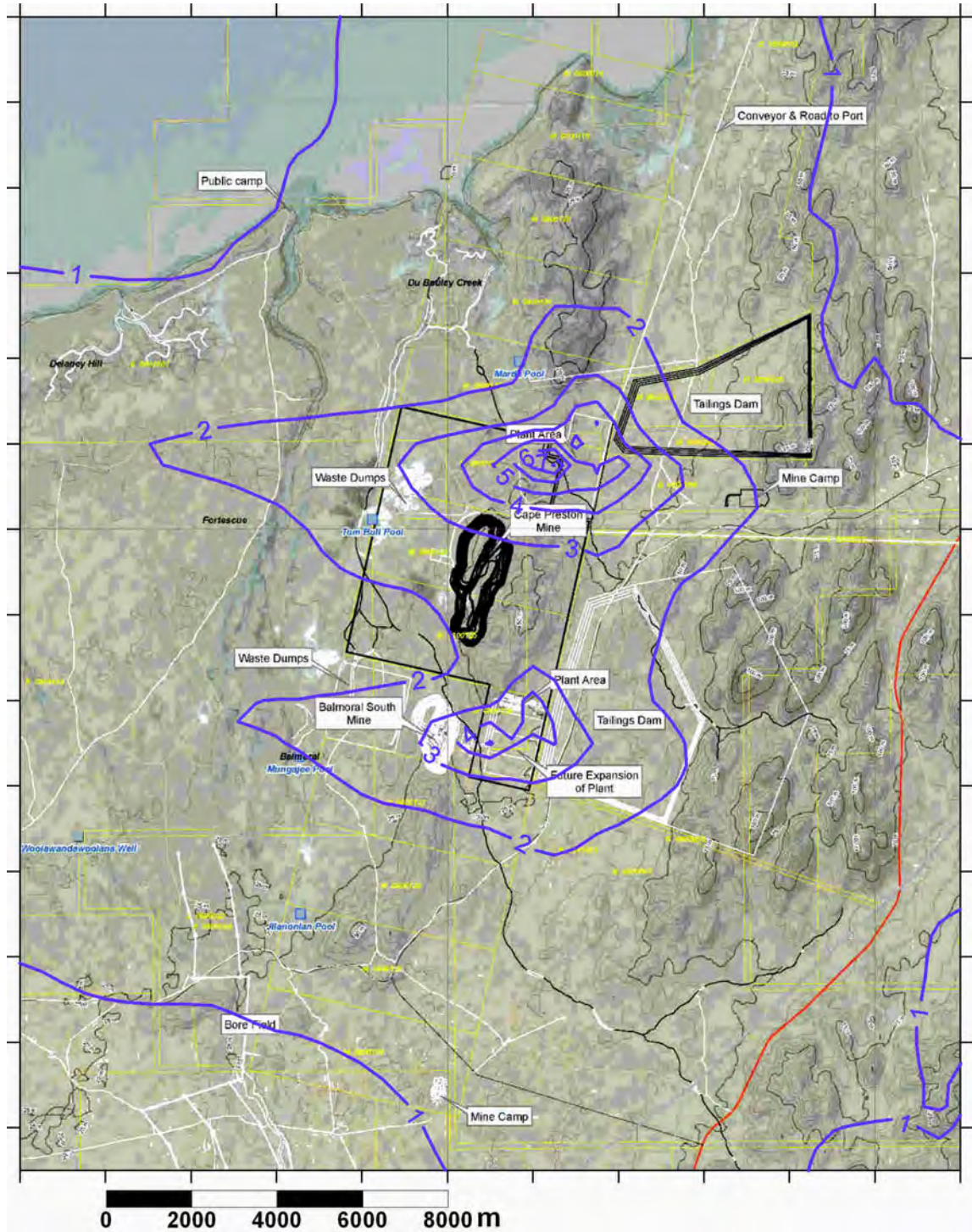


Figure 6.6 Predicted Annual Average NO_x Concentration ($\mu\text{g}/\text{m}^3$) from Mineralogy and Balmoral South

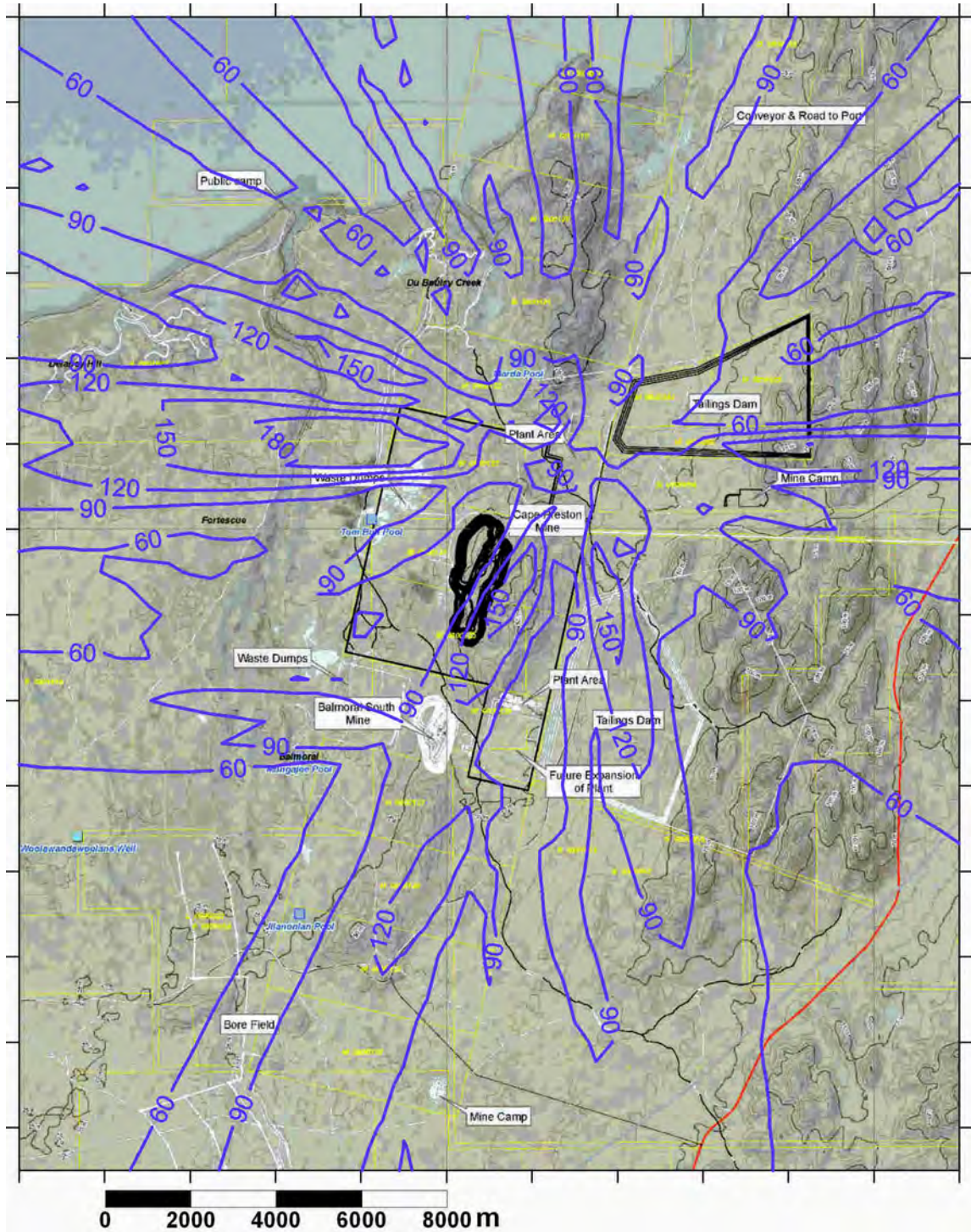


Figure 6.7 Predicted Maximum 1-hour NO₂ Concentration (µg/m³) from Mineralogy and Balmoral South

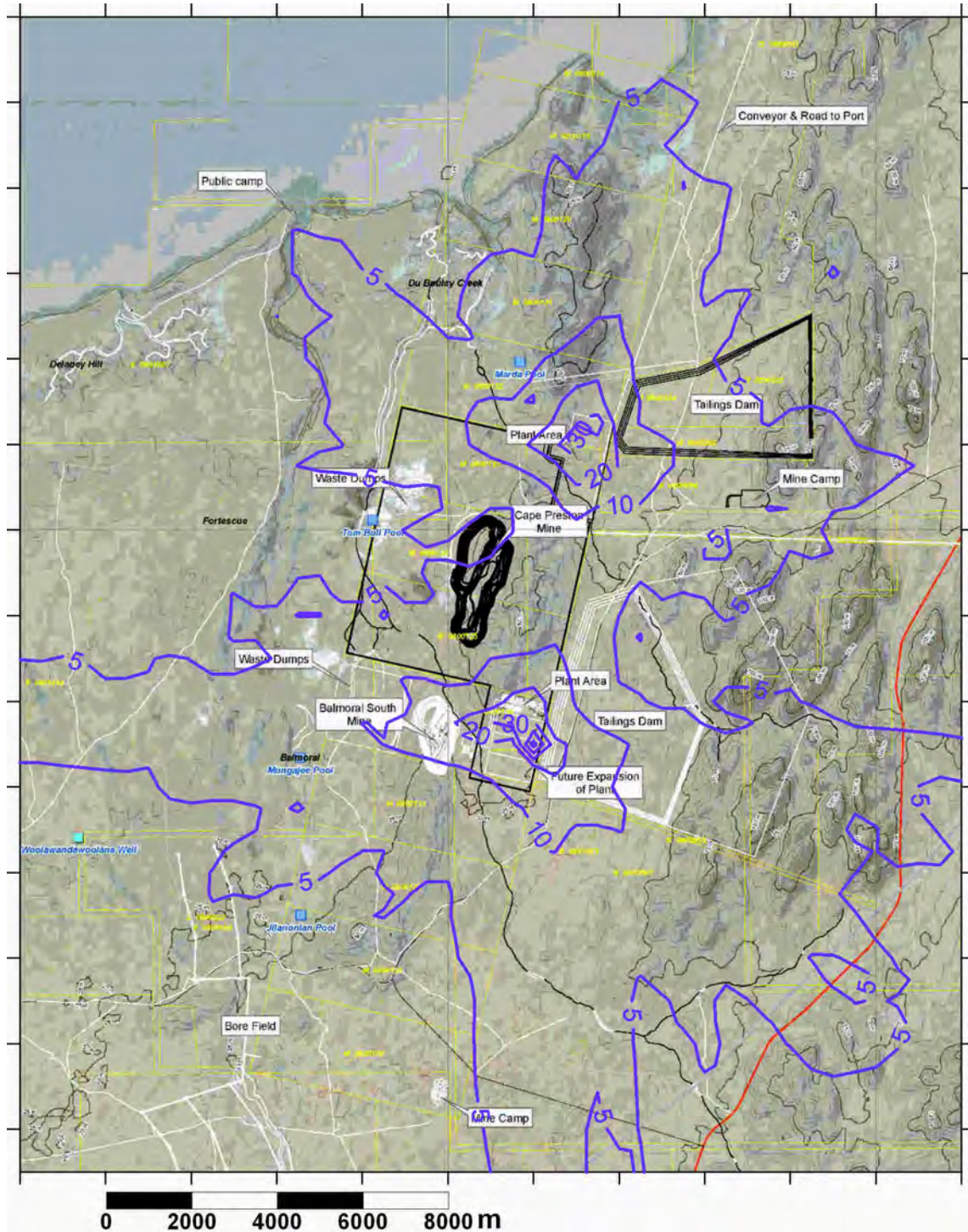


Figure 6.8 Predicted sixth highest 24-hour PM₁₀ Concentration (µg/m³) from Mineralogy and Balmoral South

6.3 Assessment of Smog Impacts

An assessment of the smog impacts in the region, particularly the impact in Damper region was undertaken in SKM (2000). This assessment was based on:

- Using the model TAPM v1 with model predictions for two months only (August 1997 and March 1998) due to the long model run times and the analysis by CSIRO (1998) indicating that these months would lead to maximum smog concentrations on land;
- Emissions included the Woodside onshore treatment plant with expansion, Hamersley Iron Power Station at Dampier and the proposed Plenty River ammonium nitrate plant, PEXCO ammonium nitrate plant and gas to synthetic hydrocarbon (Syntroleum) plant. Emissions for the 2000 Austeel assessment comprised one Pellet plant, DRI plant and 320 MW open cycle power station with total NO_x emissions of 356 g/s or 11,227 tpa and negligible VOC were emissions.

The model results indicated that the Austeel plant would make negligible difference to ozone concentrations in the Dampier/Karratha area. This would appear to be the case as the conditions under which the greatest ozone formation occur, do not correspond to the conditions in which the NO_x plumes from the Cape Preston are advected to Dampier area in relative high concentrations. The maximum concentrations of ozone at Cape Preston were predicted to be due to the plumes from the Dampier region, indicating the dominance of this source for photochemical smog in the region.

With the Balmoral south project and now expanded Mineralogy project, NO_x emissions will be 2.6 times than that modelled in 2000. As such, with the large increase in emissions, though the previous modelling indicates that the industry at Cape Preston will have a minor impact at other areas, it is considered that regional smog impact should be revisited. Other factors that may change the previous results are that:

- Volatile organic compound emissions from the Austeel proposal may have been understated for the pellet plant, as indicated by the VOC emission factors provided in the USEPA emission factors “handbooks”; and
- There have been improvements in the TAPM model and estimates of background reactive compounds, which may change the modelling outcomes somewhat.

7 Conclusions and Recommendations

This report presents a preliminary assessment of the likely ground level concentrations from the Balmoral South pellet plant, DRI plant and power station. Estimates have been derived using emissions based on the Austeel (now Mineralogy) proposal of 2000 and 2002, the use of the model AERMOD and meteorological data predicted using TAPM. Based on these the following are predicted:

Balmoral South project alone

- At the nearby camps and camping grounds where the NEPM standards are considered to apply the concentration are predicted to be at most 16% of the 1-hour NEPM NO₂ standard, 8% of the PM₁₀ standard and at most 1.6% of the SO₂ standard; and
- Considering background concentrations, the cumulative NO₂ concentration at these locations are estimated to be at most 18% of the NEPM NO₂ standards. For PM₁₀, taking into account background concentrations, the 6th highest concentrations at the nearest camp or camping area would be 26 µg/m³ or 52% of the NEPM standard, this consisting primarily of background “dust”. For SO₂ with negligible background concentrations, the concentrations will be at most 1.6% of the standard.

Mineralogy and Balmoral South projects

- The Mineralogy project is the larger source of emissions and for the 1-hour and 24-hour averages is the primary contributor to the highest concentrations in the area;
- At the nearby camps and camping grounds where the NEPM criteria are considered to apply, the concentrations are predicted to be at most 53% of the 1-hour NEPM NO₂ standard, 10% of the 24-hour PM₁₀ standard and 7.3% of the SO₂ standard; and
- Considering background concentrations, the cumulative NO₂ concentration at nearby camps are predicted to be 59% of the NEPM NO₂ standards, with PM₁₀ at 64% of the NEPM standard, with SO₂ unchanged at 7.3% of the standard.

It is noted that the above assessment has not included other sources such as fugitive dust. Fugitive dust is considered best addressed through developing comprehensive dust management plans (which would typically include ambient monitoring) as estimating fugitive dust emissions and therefore the resultant predictions of dust concentrations, is reasonably uncertain.

The results above are noted as preliminary, primarily because of the uncertainty in the emissions being based on the 2002 proposal by Austeel, apart for the power station. As such, it is recommended that to refine the predicted air quality impacts, the following is required:

- Incorporate the more detailed plant design and emission for both projects, in particular the NO_x emissions from the Pellet plant which are at present considered likely to be overestimated;
- Incorporate the on-site meteorological data currently being collected;
- Provide more detail on any upset and abnormal conditions, including possible failure of pollution control equipment,
- Re-undertake a regional smog assessments, to account for the larger emissions of NO_x and incorporating more accurate VOC estimates from the plant and regional emission inventory; and

- For the predictions of NO₂, confirm the NO₂ to NO_x ratios from the Pellet and DRI plant and power station.

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Appendix A Typical AERMOD File

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CO STARTING
TITLEONE Apr 2007. Austeel (shifted north) and Balmoral South
TITLETWO Pellet Plant, DRI and Power Station
MODELOPT CONC
AVERTIME 1 24 PERIOD
POLLUTID NOX

** CO ELEVUNIT card is obsolescent; moved to RE pathway
** ELEVUNIT METERS
RUNORNOT RUN
ERRORFIL DEPERR.OUT
CO FINISHED

SO STARTING
ELEVUNIT METERS

LOCATION PP_Main1 POINT 413061 7671800 20.0
SRCPARAM PP_Main1 231.34 60.0 413 18.0 8.25

LOCATION PP_Main2 POINT 413228 7671768 20.0
SRCPARAM PP_Main2 231.34 60.0 413 18.0 8.25

LOCATION DR_Maina POINT 413068 7672120 20.0
SRCPARAM DR_Maina 28.70 60.0 613 16.0 5.84

LOCATION DR_Mainb POINT 413145 7672103 20.0
SRCPARAM DR_Mainb 28.70 60.0 613 16.0 5.84

LOCATION DR_Mainc POINT 413252 7672079 20.0
SRCPARAM DR_Mainc 28.70 60.0 613 16.0 5.84

LOCATION power1 POINT 412720 7672700 20.0
SRCPARAM power1 77.88 40.0 813 46.1 5.80

LOCATION BSPP_Main POINT 411670 7665325 20.0
SRCPARAM BSPP_Main 231.3 60.0 413 18.0 8.25

LOCATION BSDR_Main POINT 412000 7665265 20.0
SRCPARAM BSDR_Main 28.70 60.0 613 16.0 5.84

LOCATION BS_power POINT 411920 7665830 20.0
SRCPARAM BS_power 14.82 15.0 729 44.1 3.00

LOCATION BS_powe2 POINT 412024 7665790 20.0
SRCPARAM BS_powe2 19.76 15.0 729 44.1 3.00

SO BUILDHGT PP_Main1 33.70 33.70 33.70 33.70 33.70 33.70
SO BUILDHGT PP_Main1 33.70 33.70 33.70 27.80 33.70 33.70
SO BUILDHGT PP_Main1 33.70 33.70 33.70 33.70 33.70 33.70
SO BUILDHGT PP_Main1 33.70 33.70 33.70 27.80 33.70 33.70
SO BUILDHGT PP_Main1 33.70 33.70 33.70 33.70 33.70 33.70
SO BUILDWID PP_Main1 92.08 94.61 94.96 92.42 87.07 79.07
SO BUILDWID PP_Main1 68.68 56.19 42.00 162.56 33.99 46.65
SO BUILDWID PP_Main1 57.88 67.36 74.79 79.95 86.17 90.50
SO BUILDWID PP_Main1 92.08 94.61 94.96 92.42 87.07 79.07
SO BUILDWID PP_Main1 68.68 56.19 42.00 162.56 33.99 46.65
SO BUILDWID PP_Main1 57.88 67.36 74.79 79.95 86.17 90.50
SO BUILDLEN PP_Main1 26.53 33.99 46.65 57.88 67.36 74.79
SO BUILDLEN PP_Main1 79.95 86.17 90.50 24.94 94.61 94.96
SO BUILDLEN PP_Main1 92.42 87.07 79.07 68.68 56.19 42.00
SO BUILDLEN PP_Main1 26.53 33.99 46.65 57.88 67.36 74.79
SO BUILDLEN PP_Main1 79.95 86.17 90.50 24.94 94.61 94.96
SO BUILDLEN PP_Main1 92.42 87.07 79.07 68.68 56.19 42.00

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Balmoral South Project

Preliminary Air Quality Assessment

SO XBADJ	PP_Main1	-44.45	-39.30	-38.16	-35.86	-32.47	-28.09
SO XBADJ	PP_Main1	-22.86	-20.43	-18.10	50.70	-11.88	-8.18
SO XBADJ	PP_Main1	-4.22	-0.14	3.94	7.90	11.63	15.00
SO XBADJ	PP_Main1	17.92	5.31	-8.49	-22.02	-34.89	-46.70
SO XBADJ	PP_Main1	-57.09	-65.74	-72.40	-75.64	-82.74	-86.78
SO XBADJ	PP_Main1	-88.19	-86.92	-83.01	-76.58	-67.82	-57.00
SO YBADJ	PP_Main1	-30.82	-35.43	-39.30	-41.99	-43.39	-43.48
SO YBADJ	PP_Main1	-42.24	-39.72	-36.00	63.82	-22.30	-14.84
SO YBADJ	PP_Main1	-6.92	1.21	9.30	17.11	22.66	27.15
SO YBADJ	PP_Main1	30.82	35.43	39.30	41.99	43.39	43.48
SO YBADJ	PP_Main1	42.24	39.72	36.00	-63.82	22.30	14.84
SO YBADJ	PP_Main1	6.92	-1.21	-9.30	-17.11	-22.66	-27.15
SO BUILDHGT	PP_Main2	33.70	33.70	33.70	33.70	33.70	33.70
SO BUILDHGT	PP_Main2	33.70	33.70	33.70	27.80	33.70	33.70
SO BUILDHGT	PP_Main2	33.70	33.70	33.70	33.70	33.70	33.70
SO BUILDHGT	PP_Main2	33.70	33.70	33.70	33.70	33.70	33.70
SO BUILDHGT	PP_Main2	33.70	33.70	33.70	27.80	33.70	33.70
SO BUILDHGT	PP_Main2	33.70	33.70	33.70	33.70	33.70	33.70
SO BUILDWID	PP_Main2	89.20	88.69	89.50	87.59	83.02	75.92
SO BUILDWID	PP_Main2	66.52	55.10	42.00	162.56	37.20	49.31
SO BUILDWID	PP_Main2	59.92	68.71	75.41	79.82	82.95	87.40
SO BUILDWID	PP_Main2	89.20	88.69	89.50	87.59	83.02	75.92
SO BUILDWID	PP_Main2	66.52	55.10	42.00	163.56	37.20	49.31
SO BUILDWID	PP_Main2	59.92	68.71	75.41	79.82	82.95	87.40
SO BUILDLLEN	PP_Main2	27.63	37.20	49.31	59.92	68.71	75.41
SO BUILDLLEN	PP_Main2	79.82	82.95	90.50	24.94	88.69	89.50
SO BUILDLLEN	PP_Main2	87.59	83.02	75.92	66.52	55.10	42.00
SO BUILDLLEN	PP_Main2	27.63	37.20	49.31	59.92	68.71	75.41
SO BUILDLLEN	PP_Main2	79.82	82.95	87.40	23.40	88.69	89.50
SO BUILDLLEN	PP_Main2	87.59	83.02	75.92	66.52	55.10	42.00
SO XBADJ	PP_Main2	-43.51	-52.68	-62.80	-71.01	-77.06	-80.77
SO XBADJ	PP_Main2	-82.03	-80.79	-185.10	-119.32	-63.28	-57.58
SO XBADJ	PP_Main2	-50.13	-41.16	-30.94	-19.77	-8.01	4.00
SO XBADJ	PP_Main2	15.89	15.48	13.49	11.09	8.35	5.36
SO XBADJ	PP_Main2	2.21	-2.16	-10.30	29.77	-25.41	-31.92
SO XBADJ	PP_Main2	-37.46	-41.86	-44.99	-46.75	-47.09	-46.00
SO YBADJ	PP_Main2	26.47	18.94	12.83	6.34	-0.35	-7.03
SO YBADJ	PP_Main2	-13.49	-19.54	-4.00	66.33	-34.08	-38.14
SO YBADJ	PP_Main2	-41.05	-42.71	-43.07	-42.12	-39.32	-33.40
SO YBADJ	PP_Main2	-26.47	-18.94	-12.83	-6.34	0.35	7.03
SO YBADJ	PP_Main2	13.49	19.54	25.00	-62.31	34.08	38.14
SO YBADJ	PP_Main2	41.05	42.71	43.07	42.12	39.32	33.40
SO BUILDHGT	DR_Maina	19.40	19.40	19.40	19.40	0.00	0.00
SO BUILDHGT	DR_Maina	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT	DR_Maina	0.00	0.00	0.00	0.00	19.40	19.40
SO BUILDHGT	DR_Maina	19.40	19.40	19.40	19.40	19.40	19.40
SO BUILDHGT	DR_Maina	19.40	19.40	0.00	0.00	0.00	0.00
SO BUILDHGT	DR_Maina	0.00	0.00	0.00	0.00	19.40	19.40
SO BUILDWID	DR_Maina	15.91	20.72	29.63	37.63	0.00	0.00
SO BUILDWID	DR_Maina	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID	DR_Maina	0.00	0.00	0.00	0.00	34.32	25.50
SO BUILDWID	DR_Maina	15.91	20.72	29.63	37.63	46.03	51.75
SO BUILDWID	DR_Maina	55.89	58.33	0.00	0.00	0.00	0.00
SO BUILDWID	DR_Maina	0.00	0.00	0.00	0.00	34.32	25.50
SO BUILDLLEN	DR_Maina	57.13	58.53	58.65	56.99	0.00	0.00
SO BUILDLLEN	DR_Maina	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDLLEN	DR_Maina	0.00	0.00	0.00	0.00	56.36	57.00
SO BUILDLLEN	DR_Maina	57.13	58.53	58.65	56.99	52.96	48.08
SO BUILDLLEN	DR_Maina	41.75	34.14	0.00	0.00	0.00	0.00
SO BUILDLLEN	DR_Maina	0.00	0.00	0.00	0.00	56.36	57.00
SO XBADJ	DR_Maina	28.63	27.39	25.31	22.47	0.00	0.00
SO XBADJ	DR_Maina	0.00	0.00	0.00	0.00	0.00	0.00
SO XBADJ	DR_Maina	0.00	0.00	0.00	0.00	-81.66	-85.00
SO XBADJ	DR_Maina	-85.76	-85.91	-83.96	-79.46	-121.79	-122.72
SO XBADJ	DR_Maina	-119.93	-113.49	0.00	0.00	0.00	0.00
SO XBADJ	DR_Maina	0.00	0.00	0.00	0.00	25.30	28.00
SO YBADJ	DR_Maina	-3.31	7.62	17.47	26.78	0.00	0.00
SO YBADJ	DR_Maina	0.00	0.00	0.00	0.00	0.00	0.00

Balmoral South Project

Preliminary Air Quality Assessment

SO YBADJ	DR_Maina	0.00	0.00	0.00	0.00	22.59	13.15
SO YBADJ	DR_Maina	3.31	-7.62	-17.47	-26.78	27.75	10.92
SO YBADJ	DR_Maina	-6.25	-23.23	0.00	0.00	0.00	0.00
SO YBADJ	DR_Maina	0.00	0.00	0.00	0.00	-22.59	-13.15
SO BUILDHGT	DR_Mainb	19.40	19.40	19.40	19.40	0.00	0.00
SO BUILDHGT	DR_Mainb	0.00	0.00	0.00	0.00	0.00	19.40
SO BUILDHGT	DR_Mainb	19.40	19.40	19.40	0.00	19.40	19.40
SO BUILDHGT	DR_Mainb	19.40	19.40	19.40	19.40	0.00	0.00
SO BUILDHGT	DR_Mainb	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT	DR_Mainb	0.00	0.00	0.00	0.00	19.40	19.40
SO BUILDWID	DR_Mainb	16.08	21.40	30.63	38.92	0.00	0.00
SO BUILDWID	DR_Mainb	0.00	0.00	0.00	0.00	0.00	58.65
SO BUILDWID	DR_Mainb	56.99	53.60	48.58	0.00	34.14	25.50
SO BUILDWID	DR_Mainb	16.08	21.40	30.63	38.92	0.00	0.00
SO BUILDWID	DR_Mainb	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID	DR_Mainb	0.00	0.00	0.00	0.00	34.14	25.50
SO BUILDLN	DR_Mainb	57.88	57.59	57.78	56.23	0.00	0.00
SO BUILDLN	DR_Mainb	0.00	0.00	0.00	0.00	0.00	29.63
SO BUILDLN	DR_Mainb	37.63	44.50	50.01	0.00	58.33	59.00
SO BUILDLN	DR_Mainb	57.88	57.59	57.78	56.23	0.00	0.00
SO BUILDLN	DR_Mainb	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDLN	DR_Mainb	0.00	0.00	0.00	0.00	58.33	59.00
SO XBADJ	DR_Mainb	29.00	29.51	27.40	24.45	0.00	0.00
SO XBADJ	DR_Mainb	0.00	0.00	0.00	0.00	0.00	-107.46
SO XBADJ	DR_Mainb	-115.51	-120.05	-120.93	0.00	-82.51	-86.00
SO XBADJ	DR_Mainb	-86.88	-87.09	-85.18	-80.68	0.00	0.00
SO XBADJ	DR_Mainb	0.00	0.00	0.00	0.00	0.00	0.00
SO XBADJ	DR_Mainb	0.00	0.00	0.00	0.00	24.18	27.00
SO YBADJ	DR_Mainb	-3.74	6.87	16.78	26.17	0.00	0.00
SO YBADJ	DR_Mainb	0.00	0.00	0.00	0.00	0.00	30.86
SO YBADJ	DR_Mainb	14.50	-2.31	-19.05	0.00	23.54	13.85
SO YBADJ	DR_Mainb	3.74	-6.87	-16.78	-26.17	0.00	0.00
SO YBADJ	DR_Mainb	0.00	0.00	0.00	0.00	0.00	0.00
SO YBADJ	DR_Mainb	0.00	0.00	0.00	0.00	-23.54	-13.85
SO BUILDHGT	DR_Mainc	19.40	19.40	19.40	19.40	0.00	0.00
SO BUILDHGT	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT	DR_Mainc	0.00	0.00	0.00	0.00	19.40	19.40
SO BUILDHGT	DR_Mainc	19.40	19.40	19.40	19.40	0.00	0.00
SO BUILDHGT	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT	DR_Mainc	0.00	0.00	0.00	0.00	19.40	19.40
SO BUILDWID	DR_Mainc	16.26	21.06	30.13	38.28	0.00	0.00
SO BUILDWID	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID	DR_Mainc	0.00	0.00	0.00	0.00	33.97	25.50
SO BUILDWID	DR_Mainc	16.26	21.06	30.13	38.28	0.00	0.00
SO BUILDWID	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID	DR_Mainc	0.00	0.00	0.00	0.00	33.97	25.50
SO BUILDLN	DR_Mainc	56.89	56.65	56.92	55.46	0.00	0.00
SO BUILDLN	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDLN	DR_Mainc	0.00	0.00	0.00	0.00	57.34	58.00
SO BUILDLN	DR_Mainc	56.89	56.65	56.92	55.46	0.00	0.00
SO BUILDLN	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDLN	DR_Mainc	0.00	0.00	0.00	0.00	57.34	58.00
SO XBADJ	DR_Mainc	30.01	30.07	27.71	24.51	0.00	0.00
SO XBADJ	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO XBADJ	DR_Mainc	0.00	0.00	0.00	0.00	-82.49	-86.00
SO XBADJ	DR_Mainc	-86.90	-86.72	-84.63	-79.97	0.00	0.00
SO XBADJ	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO XBADJ	DR_Mainc	0.00	0.00	0.00	0.00	25.14	28.00
SO YBADJ	DR_Mainc	-2.57	6.95	16.94	26.41	0.00	0.00
SO YBADJ	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO YBADJ	DR_Mainc	0.00	0.00	0.00	0.00	22.54	12.75
SO YBADJ	DR_Mainc	2.57	-6.95	-16.94	-26.41	0.00	0.00
SO YBADJ	DR_Mainc	0.00	0.00	0.00	0.00	0.00	0.00
SO YBADJ	DR_Mainc	0.00	0.00	0.00	0.00	-22.54	-12.75
SO BUILDHGT	power1	17.50	17.50	17.50	10.00	0.00	0.00
SO BUILDHGT	power1	0.00	0.00	0.00	0.00	10.00	17.50
SO BUILDHGT	power1	17.50	17.50	17.50	17.50	17.50	17.50

Balmoral South Project

Preliminary Air Quality Assessment

SO BUILDHGT power1	17.50	17.50	17.50	10.00	0.00	0.00
SO BUILDHGT power1	0.00	0.00	0.00	0.00	10.00	17.50
SO BUILDHGT power1	17.50	17.50	17.50	17.50	17.50	17.50
SO BUILDWID power1	23.81	25.89	27.19	41.37	0.00	0.00
SO BUILDWID power1	0.00	0.00	0.00	0.00	41.62	22.59
SO BUILDWID power1	22.79	22.51	23.19	23.15	22.42	21.00
SO BUILDWID power1	23.81	25.89	27.19	41.37	0.00	0.00
SO BUILDWID power1	0.00	0.00	0.00	0.00	32.04	22.59
SO BUILDWID power1	22.79	22.51	23.19	23.15	22.42	21.00
SO BUILDLEN power1	20.16	21.70	22.59	56.93	0.00	0.00
SO BUILDLEN power1	0.00	0.00	0.00	0.00	52.20	27.19
SO BUILDLEN power1	27.66	27.29	26.09	24.10	21.37	18.00
SO BUILDLEN power1	20.16	21.70	22.59	56.93	0.00	0.00
SO BUILDLEN power1	0.00	0.00	0.00	0.00	23.07	27.19
SO BUILDLEN power1	27.66	27.29	26.09	24.10	21.37	18.00
SO XBADJ power1	-44.55	-43.74	-41.61	-38.21	0.00	0.00
SO XBADJ power1	0.00	0.00	0.00	0.00	2.31	31.19
SO XBADJ power1	32.80	33.42	19.02	22.04	24.39	26.00
SO XBADJ power1	24.39	22.04	19.02	-18.72	0.00	0.00
SO XBADJ power1	0.00	0.00	0.00	0.00	-47.94	-58.37
SO XBADJ power1	-60.46	-60.70	-45.11	-55.71	-45.76	-44.00
SO YBADJ power1	-9.52	-15.26	-20.53	-24.96	0.00	0.00
SO YBADJ power1	0.00	0.00	0.00	0.00	-22.93	-16.31
SO YBADJ power1	-8.81	-0.94	-16.47	-10.05	-3.33	3.50
SO YBADJ power1	9.52	15.26	20.53	24.96	0.00	0.00
SO YBADJ power1	0.00	0.00	0.00	0.00	18.14	16.31
SO YBADJ power1	8.81	0.94	16.47	-16.26	3.33	-3.50
SO BUILDHGT BSPP_Main	33.70	33.70	33.70	33.70	33.70	33.70
SO BUILDHGT BSPP_Main	33.70	33.70	33.70	27.80	33.70	33.70
SO BUILDHGT BSPP_Main	33.70	33.70	33.70	33.70	33.70	33.70
SO BUILDHGT BSPP_Main	33.70	33.70	33.70	33.70	33.70	33.70
SO BUILDHGT BSPP_Main	33.70	33.70	33.70	27.80	33.70	33.70
SO BUILDHGT BSPP_Main	33.70	33.70	33.70	33.70	33.70	33.70
SO BUILDWID BSPP_Main	92.08	94.61	94.96	92.42	87.07	79.07
SO BUILDWID BSPP_Main	68.68	56.19	42.00	162.56	33.99	46.65
SO BUILDWID BSPP_Main	57.88	67.36	74.79	79.95	86.17	90.50
SO BUILDWID BSPP_Main	92.08	94.61	94.96	92.42	87.07	79.07
SO BUILDWID BSPP_Main	68.68	56.19	42.00	162.56	33.99	46.65
SO BUILDWID BSPP_Main	57.88	67.36	74.79	79.95	86.17	90.50
SO BUILDLEN BSPP_Main	26.53	33.99	46.65	57.88	67.36	74.79
SO BUILDLEN BSPP_Main	79.95	86.17	90.50	24.94	94.61	94.96
SO BUILDLEN BSPP_Main	92.42	87.07	79.07	68.68	56.19	42.00
SO BUILDLEN BSPP_Main	26.53	33.99	46.65	57.88	67.36	74.79
SO BUILDLEN BSPP_Main	79.95	86.17	90.50	24.94	94.61	94.96
SO BUILDLEN BSPP_Main	92.42	87.07	79.07	68.68	56.19	42.00
SO XBADJ BSPP_Main	-44.45	-39.30	-38.16	-35.86	-32.47	-28.09
SO XBADJ BSPP_Main	-22.86	-20.43	-18.10	50.70	-11.88	-8.18
SO XBADJ BSPP_Main	-4.22	-0.14	3.94	7.90	11.63	15.00
SO XBADJ BSPP_Main	17.92	5.31	-8.49	-22.02	-34.89	-46.70
SO XBADJ BSPP_Main	-57.09	-65.74	-72.40	-75.64	-82.74	-86.78
SO XBADJ BSPP_Main	-88.19	-86.92	-83.01	-76.58	-67.82	-57.00
SO YBADJ BSPP_Main	-30.82	-35.43	-39.30	-41.99	-43.39	-43.48
SO YBADJ BSPP_Main	-42.24	-39.72	-36.00	63.82	-22.30	-14.84
SO YBADJ BSPP_Main	-6.92	1.21	9.30	17.11	22.66	27.15
SO YBADJ BSPP_Main	30.82	35.43	39.30	41.99	43.39	43.48
SO YBADJ BSPP_Main	42.24	39.72	36.00	-63.82	22.30	14.84
SO YBADJ BSPP_Main	6.92	-1.21	-9.30	-17.11	-22.66	-27.15
SO BUILDHGT BSDR_Main	19.40	19.40	19.40	19.40	0.00	0.00
SO BUILDHGT BSDR_Main	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDHGT BSDR_Main	0.00	0.00	0.00	0.00	19.40	19.40
SO BUILDHGT BSDR_Main	19.40	19.40	19.40	19.40	19.40	19.40
SO BUILDHGT BSDR_Main	19.40	19.40	0.00	0.00	0.00	0.00
SO BUILDHGT BSDR_Main	0.00	0.00	0.00	0.00	19.40	19.40
SO BUILDWID BSDR_Main	15.91	20.72	29.63	37.63	0.00	0.00
SO BUILDWID BSDR_Main	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDWID BSDR_Main	0.00	0.00	0.00	0.00	34.32	25.50
SO BUILDWID BSDR_Main	15.91	20.72	29.63	37.63	46.03	51.75
SO BUILDWID BSDR_Main	55.89	58.33	0.00	0.00	0.00	0.00
SO BUILDWID BSDR_Main	0.00	0.00	0.00	0.00	34.32	25.50

Balmoral South Project

Preliminary Air Quality Assessment

SO BUILDLEN	BSDR_Main	57.13	58.53	58.65	56.99	0.00	0.00
SO BUILDLEN	BSDR_Main	0.00	0.00	0.00	0.00	0.00	0.00
SO BUILDLEN	BSDR_Main	0.00	0.00	0.00	0.00	56.36	57.00
SO BUILDLEN	BSDR_Main	57.13	58.53	58.65	56.99	52.96	48.08
SO BUILDLEN	BSDR_Main	41.75	34.14	0.00	0.00	0.00	0.00
SO BUILDLEN	BSDR_Main	0.00	0.00	0.00	0.00	56.36	57.00
SO XBADJ	BSDR_Main	28.63	27.39	25.31	22.47	0.00	0.00
SO XBADJ	BSDR_Main	0.00	0.00	0.00	0.00	0.00	0.00
SO XBADJ	BSDR_Main	0.00	0.00	0.00	0.00	-81.66	-85.00
SO XBADJ	BSDR_Main	-85.76	-85.91	-83.96	-79.46	-121.79	-122.72
SO XBADJ	BSDR_Main	-119.93	-113.49	0.00	0.00	0.00	0.00
SO XBADJ	BSDR_Main	0.00	0.00	0.00	0.00	25.30	28.00
SO YBADJ	BSDR_Main	-3.31	7.62	17.47	26.78	0.00	0.00
SO YBADJ	BSDR_Main	0.00	0.00	0.00	0.00	0.00	0.00
SO YBADJ	BSDR_Main	0.00	0.00	0.00	0.00	22.59	13.15
SO YBADJ	BSDR_Main	3.31	-7.62	-17.47	-26.78	27.75	10.92
SO YBADJ	BSDR_Main	-6.25	-23.23	0.00	0.00	0.00	0.00
SO YBADJ	BSDR_Main	0.00	0.00	0.00	0.00	-22.59	-13.15

SRCGROUP ALL
SO FINISHED

RE STARTING

GRIDCART C500 STA	
gridcart XYINC 400000 45 500 7655000 55 500	
37	GRIDCART elev 1 27 25 27 27 28 28 30 30 29 30 30 32 31 32 33 33 32 33 32 32 34 35 36
37	GRIDCART elev 2 26 24 25 27 27 28 29 29 29 30 31 30 29 32 33 32 31 32 33 32 33 34 35
37	GRIDCART elev 3 25 25 25 25 26 27 28 29 30 30 32 29 30 31 32 30 31 32 31 31 33 35 36
36	GRIDCART elev 4 24 23 25 24 25 26 26 28 29 31 27 29 31 30 31 29 30 30 31 30 33 34 35
36	GRIDCART elev 5 23 24 24 25 25 26 28 28 29 29 27 30 29 30 30 31 30 29 30 31 32 32 33
35	GRIDCART elev 6 22 23 24 24 25 26 29 29 29 29 24 31 35 29 30 28 28 30 29 31 31 33 35
35	GRIDCART elev 7 22 22 23 25 25 26 28 29 29 28 26 29 29 29 28 28 30 28 29 29 31 32 34
34	GRIDCART elev 8 21 22 23 24 25 26 27 34 35 30 25 29 28 37 26 28 28 28 28 30 31 32 35
34	GRIDCART elev 9 21 23 25 25 26 25 25 26 30 35 27 28 28 27 26 28 27 28 28 31 32 33 33
34	GRIDCART elev 10 21 22 23 25 24 24 24 25 26 28 25 26 26 26 26 26 27 36 30 30 30 32 33
33	GRIDCART elev 11 21 22 22 22 23 23 24 25 27 27 28 25 24 25 28 33 32 38 31 32 31 31 32
32	GRIDCART elev 12 21 20 21 21 22 23 24 25 24 25 28 25 23 26 27 43 45 45 37 33 33 33 31
29	GRIDCART elev 13 20 20 21 22 22 22 23 23 24 25 25 25 23 22 25 38 43 46 41 35 36 36 32
29	GRIDCART elev 14 19 20 21 21 23 24 21 23 23 23 27 24 24 21 24 27 36 35 40 39 35 39 32
28	GRIDCART elev 15 19 21 20 20 22 22 22 21 21 23 25 25 23 20 24 23 26 27 34 43 32 38 29
26	GRIDCART elev 16 19 19 19 20 21 21 21 22 21 24 22 24 22 22 23 23 22 24 33 46 32 30 27
26	GRIDCART elev 17 19 19 19 19 21 21 20 22 22 21 23 21 22 22 22 20 21 33 44 32 27 28

Balmoral South Project

Preliminary Air Quality Assessment

8	19	21	GRIDCART elev 43	0	0	0	0	0	0	0	3	8	8	7	7	6	6	5	7	7	6	5	6	5	5	5
8	19	24	GRIDCART elev 44	0	0	0	0	0	0	0	0	2	10	8	6	7	7	8	8	6	6	5	4	5	3	
3	11	15	GRIDCART elev 45	0	0	0	0	0	0	0	0	0	0	6	7	4	7	8	6	9	6	7	4	5	4	
4	10	17	GRIDCART elev 46	0	0	0	0	0	0	0	0	0	0	0	2	3	6	4	1	4	8	5	5	3	6	
7	11	26	GRIDCART elev 47	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	4	10	
8	16	26	GRIDCART elev 48	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	
7	13	13	GRIDCART elev 49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
0	6	9	GRIDCART elev 49	12	6	4	3	3	3	5	9	13	15	25	38	30	34	33	42	30	27	26	0	0	0	
0	0	13	GRIDCART elev 50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
0	0	2	GRIDCART elev 51	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
0	0	0	GRIDCART elev 51	14	3	5	4	4	5	6	10	14	16	20	27	30	42	36	30	26	24	23	0	0	0	
0	0	0	GRIDCART elev 52	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
0	0	0	GRIDCART elev 52	12	2	0	0	1	4	6	9	12	13	24	32	40	52	50	33	29	24	23	0	0	0	
0	0	0	GRIDCART elev 53	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
0	0	0	GRIDCART elev 53	1	0	0	0	0	2	3	8	9	15	19	23	56	54	46	44	27	23	21	0	0	0	
0	0	0	GRIDCART elev 54	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
0	0	0	GRIDCART elev 54	0	0	0	0	0	4	5	9	12	19	29	42	58	52	50	32	23	21	0	0	0	0	
37	38	38	GRIDCART elev 55	0	0	0	0	0	4	3	5	13	21	33	39	46	63	62	57	29	21	32	34	35	36	
37	38	38	GRIDCART hill 1	27	25	27	27	28	28	30	30	29	30	30	32	31	32	33	33	32	33	32	32	34	35	36
37	38	38	GRIDCART hill 2	26	24	25	27	27	28	29	29	29	30	31	30	29	32	33	32	31	32	33	32	33	34	35
37	39	39	GRIDCART hill 3	25	25	25	25	26	27	28	29	30	30	32	29	30	31	32	30	31	32	31	31	33	35	36
36	38	38	GRIDCART hill 4	24	23	25	24	25	26	26	28	29	31	27	29	31	30	31	29	30	30	31	30	33	34	35
36	37	37	GRIDCART hill 5	23	24	24	25	25	26	28	28	29	29	27	30	29	30	30	31	30	29	30	31	32	32	33
35	37	37	GRIDCART hill 6	22	23	24	24	25	26	29	29	29	29	24	31	35	29	30	28	28	30	29	31	31	33	35
35	36	36	GRIDCART hill 7	22	22	23	25	25	26	28	29	29	28	26	29	29	29	28	28	30	28	29	29	31	32	34
34	36	36	GRIDCART hill 8	21	22	23	24	25	26	27	34	35	30	25	29	28	37	26	28	28	28	28	30	31	32	35
34	35	35	GRIDCART hill 9	21	23	25	25	26	25	25	26	30	35	27	28	28	27	26	28	27	28	28	31	32	33	33
34	34	34	GRIDCART hill 10	21	22	23	25	24	24	25	26	28	25	26	26	26	26	26	26	27	36	30	30	30	32	33
33	34	34	GRIDCART hill 11	21	22	22	22	23	23	24	25	27	27	28	25	24	25	28	33	32	38	31	32	31	31	32
32	33	33	GRIDCART hill 12	21	20	21	21	22	23	24	25	24	25	28	25	23	26	43	43	45	45	37	33	33	33	31
29	32	32	GRIDCART hill 13	20	20	21	22	22	22	23	23	24	25	25	25	23	22	38	38	43	46	41	35	36	36	32

Balmoral South Project

Preliminary Air Quality Assessment

30	GRIDCART hill 39	5	5	6	5	7	6	6	6	6	8	7	9	8	8	6	8	8	8	7	8	6	30	30
	GRIDCART hill 39	27	30	32	32	16	17	18	19	24	26	30	36	52	61	91	91	63	84	84	43			
30	GRIDCART hill 40	7	7	6	9	7	12	12	6	5	5	9	9	9	8	6	8	7	7	6	6	8	30	30
	GRIDCART hill 40	30	37	32	32	18	16	18	20	22	23	28	35	41	51	56	81	56	71	84	40			
30	GRIDCART hill 41	7	8	8	9	7	12	12	12	12	6	7	7	6	8	8	7	7	6	6	5	5	30	30
	GRIDCART hill 41	22	29	26	21	18	16	18	18	21	29	29	33	37	42	58	80	56	58	43	38			
19	GRIDCART hill 42	8	8	8	9	7	12	12	12	6	6	6	5	8	8	5	5	6	5	6	6	5	19	19
	GRIDCART hill 42	27	27	28	28	19	15	15	17	20	28	28	31	45	54	53	72	72	46	40	38			
19	GRIDCART hill 43	8	8	9	9	12	12	12	12	8	8	7	7	6	6	5	7	7	6	5	6	5	19	19
	GRIDCART hill 43	21	29	29	17	14	13	14	16	19	49	30	39	60	60	58	55	48	42	38	34			
19	GRIDCART hill 44	8	8	9	12	12	12	12	12	8	10	10	8	6	7	7	8	8	9	6	5	19	19	19
	GRIDCART hill 44	24	29	29	17	12	12	13	15	49	49	49	47	51	66	55	45	43	38	37	35			
19	GRIDCART hill 45	8	8	9	12	12	12	12	12	10	10	10	6	7	7	7	8	9	9	9	7	7	19	19
	GRIDCART hill 45	30	30	30	33	11	10	11	16	49	49	49	45	64	69	51	48	38	35	35	32			
26	GRIDCART hill 46	8	9	12	12	12	12	12	10	10	10	10	10	7	6	6	8	9	9	8	8	5	10	26
	GRIDCART hill 46	33	33	23	28	28	9	49	49	49	49	49	48	48	48	48	46	39	31	31	32			
26	GRIDCART hill 47	8	12	12	12	12	12	12	10	10	10	10	10	7	6	6	8	9	8	8	8	10	10	10
	GRIDCART hill 47	26	33	28	28	28	28	49	49	49	49	48	48	46	45	39	43	51	51	30	29			
26	GRIDCART hill 48	8	12	12	12	12	12	12	10	10	10	10	7	7	6	6	6	8	8	8	8	10	10	26
	GRIDCART hill 48	26	19	28	28	28	28	49	49	49	48	24	46	46	32	36	42	43	32	29	28			
26	GRIDCART hill 49	12	12	12	12	12	12	10	10	10	10	10	7	7	6	6	6	8	8	8	8	26	26	26
	GRIDCART hill 49	26	26	28	28	28	28	49	49	24	24	46	46	38	30	34	33	42	30	27	26			
26	GRIDCART hill 50	12	12	12	12	12	12	10	10	10	10	10	7	6	6	6	6	8	8	8	8	26	26	26
	GRIDCART hill 50	26	26	28	28	28	7	7	7	10	12	38	38	38	37	46	33	30	31	25	24			
26	GRIDCART hill 51	12	12	12	12	12	12	10	10	10	10	10	7	6	6	6	8	8	8	8	26	26	26	26
	GRIDCART hill 51	13	14	14	14	28	7	5	10	10	14	16	20	27	52	42	36	30	26	24	23			
13	GRIDCART hill 52	12	12	12	12	12	10	10	10	10	10	10	7	6	6	6	8	8	26	26	26	26	26	13
	GRIDCART hill 52	13	12	12	14	14	7	10	9	9	12	56	56	56	40	52	50	50	29	24	23			
13	GRIDCART hill 53	12	12	12	12	12	10	10	10	10	10	10	6	6	6	6	8	26	26	26	26	26	13	13
	GRIDCART hill 53	12	12	12	12	12	9	56	56	56	56	56	56	56	56	54	46	44	44	57	21			
13	GRIDCART hill 54	12	12	12	12	10	10	10	10	10	10	10	6	6	6	6	8	26	26	26	26	13	13	13
	GRIDCART hill 54	12	12	12	12	12	56	56	56	56	56	56	56	56	42	58	52	50	57	57	57			
12	GRIDCART hill 55	12	12	12	12	10	10	10	10	10	10	10	6	6	6	6	26	26	26	13	13	13	13	13
	GRIDCART hill 55	12	12	12	12	12	56	56	56	56	33	33	33	33	39	46	63	62	57	57	57			

RE GRIDCART C500 END

RE FINISHED

ME STARTING

SURFFILE 3km.sur FREE
PROFFILE 3km.up
SURFDATA 54321 1999 UNK
UAIRDATA 99999 1999 UNK
PROFBASE 0.0

ME FINISHED

OU STARTING

RECTABLE 1 FIRST-SECOND
RECTABLE 24 FIRST
PLOTFILE 1 ALL 1st all2_nox_1h.dat
PLOTFILE 1 ALL 2nd all2_nox_2h.dat
PLOTFILE 24 ALL 1st all2_nox_24.dat
PLOTFILE PERIOD ALL all2_nox_an.dat

OU FINISHED