



# 2024 Annual Environmental Management Plan Review

GRAYMONT (TASMANIA) PTY LTD



**GRAYMONT**

380 Den Road

Mole Creek, Tasmania 7280

Australia

# FOREWORD

*This Annual EMP Review has been prepared by Graymont (Tasmania) Pty Ltd. This document supports and describes the mining and processing operations at the Mole Creek Limestone Mine. To the extent possible, Graymont requests that commercially sensitive information, including production rates and volumes, is kept confidential to EPA and other Government agencies.*

*This Annual EMP Review provides information regarding operational compliance with conditions of EPN 290/1 as well as annual reporting requirements from EPN 9516/1.*

*Responsibility for the procedures, commitments, and directions listed in this document is the responsibility of the Mole Creek Plant Manager.*

*The Plant Manager acknowledges the contents of this Annual EMP Review.*

*Plant Manager's Signature:*

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# EXECUTIVE SUMMARY

This Annual Environmental Management Plan (EMP) Review has been undertaken to comply with Condition G5 of EPN 290/1 for the site Condition OP1(2) of EPN 9516/1 for the progress of the North Wall Mining Plan.

A review of monitoring data from 1 January to 31 December 2024 has been undertaken. This report provides:

- Reviews of the environmental performance for each environmental issue in terms of monitoring results, complaints received, and the effectiveness of the measures implemented to minimise the potential impact on the environment
- A description of changes made on the site during the year
- Additions to the environmental management of the site

The environmental issues covered by the Annual EMP Review are briefly summarised below and reflect Graymont's commitment to practice good environmental management as per the company's Health, Safety and Environment Policy (HSE Policy) provided in Appendix A

## **AIR QUALITY MANAGEMENT**

Continuous monitoring and annual stack testing performed during the reporting period was conducted in line with compliance with limits set in schedule 5 of EPN 290/1.

Current dust control measures for kiln stack emissions remain effective in preventing off site environmental impacts. During the review period there have been zero complaints received regarding onsite dust emissions.

## **WASTEWATER MANAGEMENT**

Three discharge events were recorded in the 12-month period for surface water monitoring. All reports were within the limits set.

## **NOISE MANAGEMENT**

There were no public complaints received regarding noise emissions during the review period. A noise survey was completed in 2022, with all results within the limits as set in EPN 290/1. The next noise survey is due for completion in 2025.

## **SOLID WASTE MANAGEMENT**

During the review period disposal of solid level 2 hazardous waste produced from filtering Kiln stack emissions decreased from 208.5 tonnes in 2023 to 151.30 tonnes in 2024.

## **HAZARDOUS MATERIALS MANAGEMENT**

During the report period there were no incidents involving hazardous materials.

### ***EXTRACTIVE ACTIVITIES***

160,801 tonnes of stone were extracted, 160,074 tonnes of stone were crushed, and 57,914 tonnes of limestone was fed to the lime kiln for the reporting period.

EPN 9516/1 was approved on the 6 January 2017 and annual reporting requirements detailing progress of Mining the North Wall are included in this EMPR.

### ***REHABILITATION***

Graymont continues to monitor the rehabilitation areas at the quarry site.

Weeds on site were sprayed in February and November, primarily to eradicate pampas grass that has spread. Weed Spraying in 2024 was successful and site maintains good control over all declared and undeclared weeds.

### ***MINING THE NORTH WALL***

We continue to follow the requirements of EPN 9516/1 with regards to mining the north wall along the Mersey River.

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# INTRODUCTION

## PURPOSE OF THE ANNUAL EMP REVIEW

This Annual EMP Review has been prepared for submission to the Environment Protection Authority (EPA) and provides, but is not limited to, a review of the environmental effects of the Graymont operations in Mole Creek during the review period between 1<sup>st</sup> January 2024 and 31<sup>st</sup> December 2024. In addition, the report includes:

Information required under Schedule 4 of the Environmental Protection Notice 290/1 (EPN 290/1);

- A review of the Environmental Performance and Environmental Management Plan for the activities during the review period, being 1 January 2024 to 31 December 2024;
- Details of environmental improvements undertaken during the review period and any recommended amendments to the EPN; and
- Details of planned future developments in terms of operations and procedures.

Information required under Condition OP1(2) of Environmental Protection Notice 9516/1 (EPN 9516/1)

- Annual report on the progress of mining the North Wall from 244.25m AHD to a final level of 204.25m AHD.

## ROLE IN REGULATION PROCESS

This report fulfils requirements of condition G5 of EPN 290/1, which outlines requirements under the *Environmental Management and Pollution Control Act 1994* that apply to the operations of Graymont at Mole Creek.

## OPERATIONS OVERVIEW

Graymont operates the Mole Creek Limestone Mine under Mining Leases 96M/1971, 1885P/M, EPN 290/1, EPN 9516/1 and Permit 9864.

The Mole Creek site is permitted to produce a range of crushed and ground limestone products as well as burnt limestone products of quicklime and hydrated lime (180,000 tonnes per annum of limestone from the quarry and 160,000 tonnes per annum of limestone to the calcination plant). In 2024, Graymont extracted 160,801 tonnes of limestone, produced 160,074 tonnes of crushed limestone and fed 57,914 tonnes of limestone to the calcination plant (lime kiln).

## SITE AND OPERATIONAL HISTORY

The Mole Creek Limestone Mine is located at 380 Den Road, Mole Creek, Tasmania 7304 (Map coordinates - Latitude 41.525512° South, Longitude 146.359134° East, Elevation: 240 m).

The mine and processing facility operate on Mining Lease 96M/1971, 1885P/M, EPN 290/1 (2004) and EPN 9516/1 (2017). Permit 9864 regulates the operation of the Waste Rock Depot.

In 2004 an Environmental Management Plan Review and a Rehabilitation and Decommissioning Plan (EMP & DRP) were approved by EPA for the site. The Decommissioning and Rehabilitation Plan was required to be reviewed every three years. The last edition of the DRP was submitted and approved in January 2020. A letter from EPA dated 14 July 2020 amended the condition to review the DRP every 3 years. The DRP required under EPN 290/1 now aligns with the DRP clause EPN 9516/1, which is every 5 years. The next version of the site DRP is due in January 2025 and a copy of this is included as Appendix C to this annual EMP review.



## RELEVANT LEGISLATION, REGULATIONS, CODES AND POLICIES

Legislation, regulations, policies and guidelines that are relevant to the review include the following:

- *Environmental Management and Pollution Control Act 1994* (and associated policies and regulations regarding water pollution, noise, etc);
- *Land Use Planning and Approvals Act 1993*
- *Dangerous Substances (Safe Handling) Act 2005*
- *Dangerous Substances (Safe Handling) Regulations 2009*
- *Environment Protection (Air Pollution) Regulations 1974*
- *Environmental Protection Policy (Air Quality) 2004*
- *National Environment Protection Measure for Ambient Air Quality 2003*
- *State Policy on Water Quality Management 1997*
- *Water Management Act 1999*

- *Workplace Health and Safety Act 2012*
- Environmental Protection Policy (Noise) 2009
- National Pollution Inventory (NPI)
- Tasmanian Solid Waste Management Policy 1994
- Graymont HSE Policy

## ON-SITE PROCEDURES

Graymont will continue activities into the next review period under the Environmental Management and Operational guidelines set forth in the following documents/reports:

- Environmental Protection Notice 290/1
- Environmental Protection Notice 9516/1
- Environmental Permit Condition 9864/1
- This Annual EMP Review
- 2025 Decommissioning Rehabilitation Plan
- Quarry Code of Practice 1999
- Site Standard Operating Procedures
- Graymont HSE Policy

## REPORT STRUCTURE

This report is presented in five parts, which are described in Table 1.

**TABLE 1: REPORT STRUCTURE**

| Section Heading                            | Brief Description of the Information Provided                                                                                                                                               |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Executive Summary                          | A summary of the findings of the review, the commitments and the environmental protection notice requirements and proposed amendments.                                                      |
| Introduction                               | Operational overview, brief site history, and a list of relevant legislation and policies that have been considered when preparing the Annual EMP Review.                                   |
| Environmental Effects Review               | Describes the environmental effects of the activity during the review period. In addition, summaries of all monitoring program results are provided with interpretation.                    |
| Environmental Improvements Permit Review & | Summarises additional environmental mitigation measures. Where the current permit and environmental protection notice requirements are not applicable, proposed amendments are recommended. |
| Conclusion & Commitments                   | Summing up of the report findings for the prevention of pollution and protection of the environment, and a summary of the proposed environmental improvements.                              |



# ENVIRONMENTAL EFFECTS REVIEW

This section summarises the results of environmental monitoring during the past year. Where available, a comparison to preceding monitoring results is provided to demonstrate changes and trends. Reference is made to permit conditions specified in EPN 290/1 and issues of non-compliance are identified.

## ATMOSPHERIC EMISSIONS

Atmospheric emissions are generated from two sources from Graymont’s activities: stack emissions and fugitive dust emissions. Stack emissions complied with schedule 5 of EPN 290/1 during the review period and is summarised in Tables 2 and 3 below.

### Monitoring Results & Compliance Summary

EPN 290/1 REQUIRES VARIOUS COMBUSTION PARAMETERS ARE MONITORED; AND SPECIFIES LIMITS FOR SOME. IN SOME INSTANCES, VARIOUS PARAMETERS HAVE BEEN AMENDED BY LETTERS ISSUED BY REGULATORS. THESE ARE SUMMARISED BELOW IN

Table 2.

### Kiln Operating Temperature

Higher temperatures are considered undesirable since limestone calcines at 950°C; at higher temperatures ‘clinkering’ results and un-reactive quicklime is produced which does not meet normal quality specifications.

### Annual Stack Emissions Monitoring

There were no public complaints against Graymont regarding stack emissions from the site within the review period.

Stack testing in-line with the requirements of EPN 290/1 was performed on 26 & 27 August 2024. Sampling occurred during normal operating conditions with a production rate of 102 tonnes/day.

The annual Atmospheric Contaminant Emissions Monitoring results (including historic) are presented in Table 2 below. All results were within permitted limits for the reporting period. A full report of the Atmospheric Contaminant Emissions is supplied in Appendix B.

TABLE 2: ANNUAL STACK TESTING RESULTS 2020 - 2024

| Parameter                   | DEC-2020 | DEC-2021 | SEP-2022 | AUG-2023 | AUG-2024 | EPN 290/1 Schedule 5 Limits |
|-----------------------------|----------|----------|----------|----------|----------|-----------------------------|
| Particulates (mg/Nm³)       | <2       | 100      | 58       | <2       | <2       | 100mg/Nm3 max               |
| Sulfur dioxide SO2 (g/Nm3)  | 0.21     | <0.006   | 0.17     | <0.006   | 0.041    | 7.2g/Nm³ max                |
| Nitrogen oxides NOx (g/Nm3) | 0.036    | 0.06     | 0.047    | 0.092    | 0.062    | 2 g/Nm³ as NO₂ max          |

| Parameter                                                       | DEC-2020 | DEC-2021 | SEP-2022 | AUG-2023 | AUG-2024 | EPN 290/1 Schedule 5 Limits |
|-----------------------------------------------------------------|----------|----------|----------|----------|----------|-----------------------------|
| Lead<br>Pb (mg/Nm <sup>3</sup> )                                | <0.001   | 0.018    | 0.11     | 0.14     | 0.045    | N/A                         |
| Cadmium<br>Cd (mg/Nm <sup>3</sup> )                             | 0.025    | 0.0012   | 0.0028   | 0.0230   | 0.0019   | N/A                         |
| Carbon<br>Monoxide<br>*CO (g/Nm <sup>3</sup> )                  | 0.3      | 3.2      | 1.6      | 1.5      | 1.36     | N/A                         |
| Particulate<br>Matter<br>PM <sub>10</sub> (mg/Nm <sup>3</sup> ) | 13       | <0.9     | 97       | 50       | <2       | N/A                         |
| Chlorine Cl<br>(mg/Nm <sup>3</sup> )                            | N/A      | N/A      | <0.02    | 0.61     | 0.045    | N/A                         |

## Continuous Emissions Monitoring

Graymont also conducts daily monitoring of the kiln stack emissions to ensure daily limits are maintained within the annual limits set in the EPN.

### Total Particulates

All internal results for total particulates for the kiln stack monitoring were all within permitted limits of 100mg/Nm<sup>3</sup>, as specified in EPN 290/1.

### Carbon Monoxide

The average for Carbon Monoxide (CO) was 1,123ppm (see Table 3), which is consistent with the 2023 average of 1,039ppm and in line with historical averages. The slight peak in March is consistent with the re-start of the lime kiln following a two week shut period.

**TABLE 3: SUMMARY OF CONTINUOUS KILN EMISSION MONITORING RESULTS DURING THE REVIEW PERIOD**

| Month                         | Total Particulates<br>(mg/m <sup>3</sup> ) | CO<br>(ppm)  |
|-------------------------------|--------------------------------------------|--------------|
| January                       | 1.4                                        | 1,648        |
| February                      | 1.8                                        | 630          |
| March                         | 10.4                                       | 251          |
| April                         | 4.5                                        | 865          |
| May                           | 1.4                                        | 1,109        |
| June                          | 1.0                                        | 180          |
| July                          | 2.6                                        | 366          |
| August                        | 1.5                                        | 1,026        |
| September                     | 1.2                                        | 902          |
| October                       | 1.1                                        | 2,650        |
| November                      | 1.1                                        | 2,700        |
| December                      | 1.2                                        | 1,151        |
| <b>12 Monthly<br/>Average</b> | <b>2.4</b>                                 | <b>1,123</b> |

## **Dust Monitoring and Control**

Schedule 5 of the EPN290/1 A6: Dust produced by operating plants must be effectively controlled with accepted methods. The site continues to monitor and control dust emissions from unsealed roads by deploying the on-site water cart in dry conditions, to reduce dust from unsealed roadways. Water sprays are deployed on fixed and mobile crushing plant. Polo Citrus is also used at the Primary Jaw Crusher to reduce dust emissions. Dust collectors are installed on all silos, which controls dust emissions when filling and discharging from the Silo.

Graymont continued to make improvements to our dust collection system on the GLS Plant to reduce emissions and have designed plans for further improvement at the hammer mill infeed chute in 2025.

## **Environmental Effects**

Graymont controls the kiln's operations via a Programmable Logic Controller (PLC), which records and stores the data for monitoring. This in turn provides an overview of the entire kiln process, allowing operators to continuously monitor and control fuel consumption and balance air flow distribution to assist in combustion efficiency.

## **Environmental Requirements**

The requirements of EPN 290/1 and the actions to date taken by the site with regard to atmospheric emissions are summarised in Table 4 on the following page.

**TABLE 4: EPN 290/1 CONDITIONS AND GRAYMONT RELATED ACTIONS FOR AIR EMISSIONS**

| EPN Conditions                                                                                                                                                                                                                                                                                                                                                                             | Action                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A1: Stack testing facilities must comply with Australian Standards AS4323.1 (location) and AS1657 (safety) and maintained.                                                                                                                                                                                                                                                                 | Safe access is available for conducting kiln stack emission testing                                                                                                                                                                                                                                                                                              |
| A2: Air quality modelling using the AUSPLUME Gaussian plume dispersion model or similar must be undertaken and reported by 30 <sup>th</sup> June 2006.                                                                                                                                                                                                                                     | Air quality modelling was undertaken in 2005 and results reported to DTAE by 30 <sup>th</sup> June 2006.                                                                                                                                                                                                                                                         |
| A3: Air quality monitoring of ambient and ground level concentrations must be monitored and reported by 30 <sup>th</sup> June 2004.                                                                                                                                                                                                                                                        | Ambient and ground level air quality sampling was undertaken and the results reported to DPIWE by 30 <sup>th</sup> June 2005.                                                                                                                                                                                                                                    |
| A4: Results from A2 and A3 will assist to review and plan management prescriptions to reduce particulate emissions from the kiln stack to a maximum target level of 450mg/m <sup>3</sup> by 2006.                                                                                                                                                                                          | A new baghouse that was installed in Nov 2006 has resulted in average emissions below 100mg/m <sup>3</sup> .                                                                                                                                                                                                                                                     |
| A5: A materials spill and fugitive dust source management plan must be submitted for approval by 30 <sup>th</sup> June 2004. Dust must be minimised and managed according to the plan and not cross the boundary of all activity areas.                                                                                                                                                    | Dust minimisation measures including the watering of roads and stockpiles and the deployment of Polo Citrus in the primary crushing plant are continuing on an ongoing basis, as per the 2004 Mole Creek Dust Management Plan                                                                                                                                    |
| A6: Dust produced by operating plants must be effectively controlled with accepted methods.                                                                                                                                                                                                                                                                                                | Point source stack emissions from the kiln are controlled by a bag house. Water sprays (and polo citrus additive) employed to control fugitive dust emissions where required at the Crusher. Use of a dust collector and water sprays to reduce dust emissions from GLS plant and water cart deployed to in dry conditions to reduce dust from unsealed roadways |
| G11: (a) A Kiln combustion performance report including determination, carbon monoxide and oxygen measurements must be submitted by 31 <sup>st</sup> December 2004;<br>(b) <i>[amended] Error! Bookmark not defined.,Error! Bookmark not defined.</i><br>(c) Parameters in (b) to be monitored and recorded continually with reference to Kiln start up and shut down, kept for 12 months. | Action required for a) complete.<br>Kiln operating temperatures and CO and are monitored and recorded continuously. Graymont is no longer required to main oxygen levels in the kiln exhaust gas >3%.<br>The kiln generally operates between 960°C and 1,200°C. To reduce the temperature, fuel is reduced or air is increased.                                  |
| M2: Person responsible for the activities must carry out monitoring and reporting of all emission point sources in accordance with Schedule 5 of this Notice.                                                                                                                                                                                                                              | Air emission monitoring carried out in accordance with Schedule 5, and the results reported as required.                                                                                                                                                                                                                                                         |

# WASTEWATER EMISSIONS

## Monitoring Results & Compliance Summary

Schedule 5 of EPN 290/1 requires the discharge from settling ponds to be sampled monthly for pH, Conductivity, Oil & Grease, Chloride, Sulphate, Total Suspended Solids (TSS), combined total filterable Iron (Fe) and Manganese (Mn).

Graymont monitors two separate sampling locations for discharge which involves monthly inspections of the discharge points and a sample is taken if discharge occurs. The site also collects additional samples of the Mersey River (upstream and downstream of the site) whilst sampling the two discharge points.

The results presented in Table 5 are for those months in which there was a discharge from the ponds during the reporting period. During discharge events Graymont undertakes sampling of the Mersey River upstream and downstream of the settling ponds described hereto.

Results of the Mersey River samples are also reported in Table 5 below:

**TABLE 5: WATER EMISSION MONITORING RESULTS**

| Discharge Event | Year | Sample Date | Report Date | Area                     | pH   | Conductivity uS/cm | NFR mg/L   | Chloride mg/L | Sulphate mg/L | Filtered Fe µg/L | Total Fe µg/L | Filtered Mn µg/L | Total Mn µg/L | Oil & Grease mg/L | Report No. |
|-----------------|------|-------------|-------------|--------------------------|------|--------------------|------------|---------------|---------------|------------------|---------------|------------------|---------------|-------------------|------------|
|                 |      |             |             |                          |      |                    | EPN Limits |               |               |                  |               |                  |               |                   |            |
|                 |      |             |             |                          |      |                    | 60         | 250           | 250           | 1000             | 1000          | 1000             | 1000          | 10                |            |
| 1               | 2024 | 27/08.2024  | 28/06/2023  | West Discharge           | 7.3  | 49                 | 8          | 3.52          | 94.9          | <20              | 24            | <1               | <1            | <2                | 36919      |
|                 | 2024 | 27/08.2025  | 28/06/2023  | Mersey River Up Stream   | 11.5 | 786                | 9          | 4.53          | 1.1           | 42               | 289           | 3                | 31            | <2                | 36919      |
|                 | 2024 | 27/08.2026  | 28/06/2023  | East Discharge           | 7.3  | 57                 | 4          | 3.54          | 20.8          | <20              | 52            | <1               | 32            | <2                | 36919      |
|                 | 2024 | 27/08.2027  | 28/06/2023  | Mersey River Down Stream | 8    | 562                | 6          | 7.9           | 3.1           | 40               | 300           | 3                | 33            | <2                | 36919      |
| 2               | 2024 | 10/09/2024  | 28/07/2023  | West Discharge           | 7.2  | 47                 | 10         | 3.82          | 1             | 27               | 379           | 2                | 14            | <2                | 37632      |
|                 | 2024 | 10/09/2024  | 28/07/2023  | Mersey River Up Stream   | 8.2  | 334                | 2          | 6.36          | 102           | <20              | <20           | <1               | 1             | <2                | 37632      |
|                 | 2024 | 10/09/2024  | 28/07/2023  | East Discharge           | 7.2  | 44                 | 10         | 3.77          | 1.1           | 26               | 344           | 3                | 12            | <2                | 37632      |
|                 | 2024 | 10/09/2024  | 28/07/2023  | Mersey River Down Stream | 8    | 537                | 5          | 6.06          | 136           | <20              | 100           | <1               | 3             | <2                | 37632      |
| 3               | 2024 | 3/12/2024   | 28/06/2023  | West Discharge           | 7.1  | 46                 | 4          | 3.48          | 0.7           | 62               | 200           | 2                | 10            | <2                | 40670      |
|                 | 2024 | 3/12/2024   | 28/06/2023  | Mersey River Up Stream   | 11.3 | 587                | 12         | 2.92          | 64.4          | <20              | 46            | <1               | 1             | <2                | 40670      |
|                 | 2024 | 3/12/2024   | 28/06/2023  | East Discharge           | 7.1  | 46                 | 4          | 3.44          | 0.8           | 62               | 179           | 2                | 9             | <2                | 40670      |
|                 | 2024 | 3/12/2024   | 28/06/2023  | Mersey River Down Stream | 7.9  | 497                | 3          | 4.84          | 128           | <20              | 28            | <1               | 3             | <2                | 40670      |

## Environmental Effects

The monitoring results in Table 5 show all outcomes were within compliance limits of the EPN 290/1.

Photo 1: Western Settling Pond



Photo 2: Eastern Settling Pond



During the reporting period, 1,780 tonnes of sediment was removed from the Western Sediment Ponds. The waste material that was removed was deposited in an onsite holding area where it is dried and then used as additional fill material for site's waste rock depot.

## Environmental Requirements

The requirements of EPN 290/1 with regard to wastewater emissions and the actions to date taken by Graymont are summarised in the following table:

**TABLE 7: EPN 290/1 CONDITIONS AND GRAYMONT RELATED ACTIONS FOR WASTEWATER.**

| EPN Conditions                                                                                                                                                             | Action by Graymont                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E1: All potentially contaminated water must be collected and treated to the limits specified in Schedule 5 of EPN 290/1 before discharging from the site.                  | Graymont's current water monitoring program consists of sampling of surface water flowing from discharge points at least once per month during discharge events, for the parameters in Schedule 5 of EPN 290/1. |
| E2: All water settling dams and spillways must be designed and installed to withstand a 1 in 10 year, 24 hour storm event and must be capable of mitigating sediment loss. | Current settling ponds comply with this design standard.                                                                                                                                                        |

# NOISE EMISSIONS

## Monitoring Results & Compliance Summary

Graymont is required to undertake a boundary noise survey every three years to comply with the requirements of section N1 and N2 of the EPN 290/1. - Limit of 50 dB(A)

A noise survey was carried out to fulfil the requirements of the EPN on the 1 July 2022. The next Noise Survey is due in 2025.

## Environmental Effects

Ongoing maintenance of site plant and the plant's strategic location has proven effective in controlling noise emissions and impacts offsite.

All measurements carried out at nearby residents were all within the permitted limits and it is noted that the variations are largely due to variations in ambient noise (wind and river flow) rather than any operational changes.

## Environmental Requirements

The requirements of EPN 290/1 with regard to noise emissions and the actions to-date taken by Graymont, are summarised in the following table - Table 8.

**TABLE 8: EPN 290/1 CONDITIONS AND GRAYMONT RELATED ACTIONS FOR NOISE EMISSIONS.**

| EPN Conditions                                                                                                                                                                                                       | Action by Graymont                                                                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| N1: Noise emissions, with the exception of blast related noises, may not exceed 50dB(A). Noise emissions will be measured and analysed under Australian Standard AS1055, averaged between 10 to 20 minute intervals. | The 2022 boundary noise survey concluded that plant activities complied with the environmental permit at the nearest residential site. |
| N2: A boundary noise survey must be carried out by 30 <sup>th</sup> June 2004, and after plant changes likely to change noise characteristics or at a frequency of not less than every three years.                  | No plant changes have occurred to alter noise characteristics and the next scheduled noise survey will be conducted in 2025.           |



# SOLID WASTE EMISSIONS

## Monitoring Results & Compliance Summary

During the reporting period the site disposed of 151 tonnes of Level 2 Hazardous Waste (which was disposed of at a licenced and approved disposal facility), which is a reduction from the 208t recorded in 2023, which included additional cleaning of the baghouse chambers, which hasn't been repeated in 2024.

| YEAR | LOADS<br>TAKEN | Tonnes |
|------|----------------|--------|
| 2021 | 9              | 135    |
| 2022 | 8              | 132    |
| 2023 | 12             | 208    |
| 2024 | 10             | 151    |

## Environmental Effects

No 'general' or 'controlled' wastes are disposed of on-site.

## Environmental Requirements

The requirements of EPN 290/1 with regard to solid waste and the actions to date taken by Graymont are summarised in Table 9.

**TABLE 9: EPN 290/1 CONDITIONS AND GRAYMONT RELATED ACTIONS FOR SOLID WASTE**

| EPN Conditions                                                                                                                                                                                                                                                                        | Action by Graymont                                                                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| W1: 'General' waste, as defined by the <i>Environmental Management and Pollution Control (Waste Management) Regulations 2000</i> , must not be disposed of on the land.                                                                                                               | No general waste is disposed of on the land.                                                                                                                                                                                        |
| W2: All sludge, oily solid wastes and liquid wastes resulting from oil processing activities are to be regarded as 'controlled' (hazardous) waste and must be managed as prescribed under <i>Environmental Management and Pollution Control (Waste Management) Regulations 2000</i> . | All 'Controlled' waste is stored, removed and disposed of in compliance with <i>Environmental Management and Pollution Control (Waste Management) Regulations 2000</i> through the services of a controlled waste service provider. |

# HAZARDOUS MATERIALS

## Monitoring Results & Compliance Summary

There were no incidents involving the release of hazardous materials during the reporting period.

## Environmental Effects

Graymont meets the general compliance with Australian Standards AS 1940 Dangerous Good Storage and Handling and AS 3780 Storage and Handling of Corrosive Substances as contained in EPN 290/1.

## Environmental Requirements

The requirements of EPN 290/1 with regard to hazardous materials and the actions to date taken by Graymont are summarised in Table 11.

**TABLE 11: EPN 290/1 CONDITIONS AND GRAYMONT RELATED ACTIONS FOR HAZARDOUS MATERIALS.**

| EPN Conditions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Action by Graymont                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
| H1: Unless otherwise specified by the Director in writing, spilt or leaked environmentally hazardous material including fuels, oils or other hydrocarbons, whether fully contained or not, must promptly be recovered, and unless reusable or refinable, are to be regarded as 'controlled' (hazardous) waste and managed as prescribed under the Environmental Management and Pollution Control (Waste Management) Regulations, 2000                                                                                                                                                                                                                                                           | Complies: spillages are managed in accordance with: 635-P10.201.01 Emergency Management Plan |
| H2: Standard operating procedures for the recovery and disposal of hazardous material be developed and employed by 31 December 2004.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Complies : 635-P10.201.01 Emergency Management Plan                                          |
| H3: All hazardous material must be stored:<br>a) and contained in accordance with Australian Standards AS1940 and AS3780;<br>b) in a containment area capable of collecting 110% of the largest container or at least 25% of the total volume, whichever is greater or where not applicable<br>c) in double skinned tanks that comply with relevant Australian Standards, where portable tanks are used then their locations to be approved,<br>d) processed, loaded and unloaded in contained areas; and<br>e) in bunded areas appropriately graded, chemically resistant, equipped with protected transfer gear (wherever practical), separated by chemical and managed to maintain capacity. | Complies                                                                                     |
| H4: All hazardous wastes must be transported by holders of a Waste Transport Business Environment Protection Notice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Complies.                                                                                    |

# WASTE OIL

## Monitoring Results & Compliance Summary

EPN 290/1 requires Graymont to record and retain details of all deliveries of waste oil for two years (condition O2). Graymont continues to maintain records of all deliveries as required by this clause.

## Environmental Effects

Effects are minimized by managing hazardous wastes to align with requirements to ensure they are compliant with quality requirements G10 and O1. Quality testing on each load of oil delivered to site is completed using a bomb calorimeter to assist operations by indicating the waste oil's calorific value. Records for oil usage are maintained in accordance with the requirements of the EPN.

## Environmental Requirements

The requirements of EPN 290/1 with regard to waste oil and the actions to date taken by Graymont are summarised in Table 12.

**TABLE 12: EPN 290/1 CONDITIONS AND GRAYMONT RELATED ACTIONS FOR HAZARDOUS MATERIALS.**

| EPN Conditions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Action by Graymont                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| G10: Kiln fuel is restricted to waste oil that complies with O1 of this EPN, virgin furnace fuel oils, diesel, natural gas and/or vegetable oils.                                                                                                                                                                                                                                                                                                                                                                                                                                          | Complies.                                                                                                                       |
| O1: Waste oil must:<br>a) not contain PCB's (unless it is transformer oil containing not more than 2 milligrams);<br>b) not contain any material(s) that would exceed emission limits from the lime calcination plant or cause environmental nuisance or harm on combustion; and<br>c) be filtered prior to use.                                                                                                                                                                                                                                                                           | Complies.<br><br>All oil is filtered to <400µm.                                                                                 |
| O2: Deliveries of waste oil must be recorded and held for 2 years, including delivery company/individual details, date and time, bulk quantity delivered, specific nature of oil(s), identification number/code and the receiving person's name.                                                                                                                                                                                                                                                                                                                                           | Complies. All deliveries of waste oil are recorded. The site received 3,451,954 litres of waste oil in 2024                     |
| O3: a) Unless accompanied by a certificate of analysis, every load of oil suspected of or containing waste transformer oil must be sampled in duplicate for PCB content and not used or mixed with any other oil until it is determined suitable;<br>b) samples from O3(a) must have an identifying number/code;<br>c) where PCB's are detected, the Director may require testing of the second sample;<br>d) information required by O3(a) and (b) must be provided to the Director within 14 days; and<br>e) all unused duplicate samples from O3(a) must be held on site for 12 months. | Complies.<br><br>Certificate of analysis provided by waste oil supplier for all loads of waste oil containing transformer oils. |

# EXTRACTIVE ACTIVITIES

## Monitoring Results & Compliance Summary

EPN 290/1 does not require any monitoring or recording for this activity.

### Environmental Effects

During the review period, 160,801 tonnes of stone was extracted from the quarry and 160,074 tonnes of stone was crushed in the primary crusher. From the tonnes crushed, 57,914 tonnes of limestone was fed to the lime kiln.

There have been no public complaints regarding extractive activities within the review period.

### MINING THE NORTH WALL

The application to mine the pit North Wall down from 244.25m AHD to a final level of 204.25m AHD which is estimated to increase the mining life of the mine by 10 years (at that point in time) was approved by the EPA in January 2017 under the issuing of EPN 9516/1.

Condition OP1(2) of EPN 9516/1 requires an annual report on the progress of the North Wall Mining Plan

- All shots along the North Wall complied with Graymont's approved mining method of creating 3m benches to limit the potential for rocks and other debris to fall to the river's edge.
- Graymont confirms all activities complied with the requirements of the EPN 9516/1 and the North Wall Mining Plan.
- There were no complaints received during the reporting period for mining activities along the North Wall.

## NORTHERN WALL COMPLIANCE PHOTOS

| 9 Jul 2021                                                                         | 7 Jul 2022                                                                          | 19 Jul 2023                                                                          | 26 Jun 2024                                                                          |
|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
|   |   |   |   |
| 10 Dec 2021                                                                        | 16 Dec 2022                                                                         | 21 Dec 2023                                                                          | 19 Dec 2024                                                                          |
|  |  |  |  |

## Environmental Requirements

The requirements of EPN 290/1 with regard to quarry operations and the actions to date taken by Graymont are summarised in Table 13.

**TABLE 14: EPN 290/1 CONDITIONS AND GRAYMONT RELATED ACTIONS FOR QUARRY OPERATIONS.**

| EPN Conditions                                                                                                                                                                  | Action by Graymont                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| X1: Quarry must operate under present EMP or Rehabilitation Plan and Acceptable Standards of the <i>Quarry Code of Practice</i> .                                               | Graymont's quarry is operating in accordance with the 2025 edition of the Decommissioning and Rehabilitation Plan (DRP) and the <i>Quarry Code of Practice</i> .                                                                                                                                                            |
| X2: Quarry Rehabilitation Plan must be submitted by 31 <sup>st</sup> December 2004 and reviewed and resubmitted every 3 years thereafter.                                       | This requirement was amended in a letter issued by EPA on 14 July 2021 and realigned the timing of the DRP to coincide the requirements of EPN 9516/1 and Permit 9864. The DRP is now required to be reviewed every 5 years. A copy of the 2025 DRP is attached to this report. The next edition of the DRP is due in 2030. |
| X3: Blasting may only occur using Best Practice Environmental Management principles, measured and recorded when required and take place between 0800 and 1700 Monday to Friday. | Blasting only occurred between the specified hours and records of blasts are kept on site, with the Quarry Supervisor.                                                                                                                                                                                                      |



# REHABILITATION

## Monitoring Results & Compliance Summary

Schedule 3 of EPN 290/1 requires a decommissioning and rehabilitation plan.

The latest edition of the DRP under this EPN was submitted with this report in January 2025. The next edition of the DRP is due Jan 2030.

The approved DRP covers the aims, requirements and targets specified in the EPN.

## Environmental Effects

Graymont continues to monitor the following tree rehab areas on site:

- Southern benches
- The Eastern bench
- The Old Quarry Road
- Dump Extension tree screen

Native trees planted in these area are as follows:

- Acacia dealbata - Silver Wattle
- Acacia melanoxylon - Blackwood
- Allocasuarina littoralis - Bull Oak
- Banksia marginata - Silver Banksia
- Cassinia aculeata - Dollybush
- Eucalyptus amygdalina - Black Peppermint
- Eucalyptus ovata - Swamp Gum
- Eucalyptus rodwayi - Black Swamp Gum
- Eucalyptus viminalis -White Gum
- Leptospermum lanigerum -Woolly Tea tree
- Pittosporum bicolor -Cheesewood

## Environmental Requirements

The requirements of EPN 290/1 regarding rehabilitation and the actions to date taken by Graymont are summarised in Table 14.

A conceptual Decommissioning and Rehabilitation Plan (DRP) for the site was prepared in 2004. The requirement under EPN 290/1 Condition R2 (c) to formally review the DRP every three years was amended in a letter received from EPA on 14 July 2021. The timing of a site-wide DRP now aligns with condition DC1 of EPN 9516/1 with the next edition of the DRP now due in 2030.

**TABLE 14: EPN 290/1 CONDITIONS AND GRAYMONT RELATED ACTIONS FOR REHABILITATION**

| EPN Conditions                                                                                                                                                                                       | Action by Graymont                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| R1: If permanent cessation of operations on land is planned, then the Director must be notified of the planned cessation of operations, including a final date of production if one is known.        | Not applicable at this stage.                                        |
| R2: A DRP for the activity and associated land must be submitted for approval by 2004 and be revised every three years and within 30 days of a notification for the planned cessation of operations. | DRP (originally approved in 2004) was revised and submitted in 2019. |
| R3: Decommissioning and rehabilitation of the activity and land must be undertaken in accordance with the DRP.                                                                                       | Rehabilitation activities are in accordance with the approved DRP.   |

## A review of the achievement of set targets as measured against KPI's for the DRP

We are currently tracking behind schedule on the rehabilitation targets outlined in the latest version of the DRP (April 2020) due to bench construction on Waste Rock Depot. These particular benches are scheduled for final phase of development for 2024. However, we are tracking on target with the objectives listed in the latest version of the DRP as seen here:

- full compliance with all applicable environmental standards, legislation, and conditions of licence, approval or permit;
- the site's final land use for the rehabilitated land;
- specific rehabilitation management and mitigation procedures;
- specific mine closure management and mitigation procedures;
- establishment of a clear set of indicators and rehabilitation completion criteria;
- rehabilitation of the site to a safe and stable condition;
- environmental risks;
- revegetation of the post mine landscape.



## Status of external certification/accreditation of the activities' Environmental Management System.

Graymont does not currently have external certification for its environmental management system. Graymont is certified to ISO 9001 Quality Management Systems.

## Weed Spraying

In line with best practise weed and hygiene measures Graymont developed a Weed and Disease Management Plan in October 2019 that outlines measures to:

- Control all declared weeds on site.
- Minimise contamination of product leaving the quarry area.
- Minimise contamination crossing to neighbouring properties 5

Implementing these measures involves managing weeds within the site as well as managing the spread of weeds to/from the site.

To control declared weeds on the quarry site, the following weed control measures have been carried out by a weed contractor:

- February 2024 – pampas grass, thistles, blackberry
- November 2024 – pampas grass, thistles

Sustained efforts in this regard have helped control weeds on the site and the spread of weeds from the site.

To further reduce the spread of weeds at the site Graymont will ensure treatment of weeds across the site is consistently carried out twice per year in line with the approved Weed Management Plan.

## Greenhouse Challenge

As previously indicated in the 2022 EMPR, Graymont is no longer a participant of the Greenhouse Challenge as this has become a redundant scheme. The Greenhouse Challenge programme ceased on 30 June 2009 in accordance with the Wilkins Review recommendations. (2008 Strategic Review of Australian Government Climate Change Programs - Wilkins Review)

Graymont actively monitors GHG emissions and electricity usage locally, as well as around the globe. Mole Creek does not generate its own electricity. Therefore, only gross values are recorded. Mole Creek data is displayed below:

| Facility         | 2024                                                    |                                |                                              |
|------------------|---------------------------------------------------------|--------------------------------|----------------------------------------------|
|                  | Consumption Intensity Factor (kg CO <sub>2</sub> e/kWh) | Annual Electricity Usage (kWh) | CO <sub>2</sub> e (Scope 2) Emissions (T/yr) |
| Mole Creek Plant | 0.15                                                    | 2,919,654                      | 438                                          |

## SUMMARY OF ENVIRONMENTAL EFFECTS

- The kiln stack emissions remain steady and well below permitted limits.
- No environmental complaints were received during the reporting period.
- No environmental incidents occurred during the reporting period.
- The five-year DRP is due in January 2025 and a copy of this is attached to this report.
- Planning Application and Environmental Impact Statement (EIS) for the proposal to increase the permitted extraction and crushed tonne limit from 180,000t annually to 350,000t annually was lodged with Meander Valley Council in June 2024.
- Graymont continues to improve the dust collection system at the GLS plant with the installation of additional dust collection points at the vibrating screen.

## MAJOR EVENTS AND FUTURE DEVELOPMENTS

### Summary of Major Events

- Graymont anticipates the assessment of our lodged Planning Application to Meander Valley Council to increase the annual extraction and crushed tonne limit from 180,000t to 350,000t to be completed in 2025.

# APPENDIX A

## GRAYMONT HEALTH SAFETY & ENVIRONMENT POLICY

### HEALTH, SAFETY AND ENVIRONMENTAL POLICY

Publication date: 05-11-2013 | Revision date: 10-27-2022



At Graymont, we work together toward our vision of being world-class in everything we do, safety, customers, communities, environment, value creation and people.

Our health, safety, and environment (HSE) culture and management system are the foundation for advancement toward our world-class vision. In our culture, we work as a team and share the responsibility to achieve performance results while continuously incorporating learnings from our collective experiences. The Graymont HSE management system provides the tools and data necessary to drive continuous improvement from extraction to product delivery and ultimately through reclamation.

To advance toward world class HSE performance, we:

1. Believe that the health and safety of our employees, contractors, carriers, visitors, customers, and the communities in which we operate is paramount and act accordingly.
2. Reinforce and encourage safe behaviours in and out of the workplace.
3. Meet or exceed all relevant regulatory and permit obligations
4. Ensure responsible use of natural resources, while working proactively to minimize the environmental impacts of our operation
5. Contribute to the well-being of the communities where we operate
6. Continue to reduce our carbon footprint and strive to be part of the decarbonized world
7. Ensure corporate HSE goals are supported through activity-based objectives
8. Plan appropriate resources to successfully achieve HSE results
9. Continuously challenge ourselves to identify and pursue opportunities to improve our HSE approach, processes and results

**Stéphane Godin**  
President & Chief Executive Officer



## **APPENDIX B**

### ATMOSPHERIC CONTAMINANT EMISSIONS MONITORING PROGRAM REPORT (2023)

## **APPENDIX C**

### DECOMMISSIONING AND REHABILITATION PLAN (2025)