

Ambient Air Quality Monitoring (AAQM) Report January 2021

West Gate Tunnel Project

Submitted to:

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1789878-030-R-Rev0

March 2021



Accreditation No. 1910

Accredited for compliance with ISO/IEC 17025 - Testing.

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Record of Issue

Company	Client Contact	Version	Date Issued	Method of Delivery	Amendment
CPB JH WGT Project	Tim Spawton	Rev A	22/02/2021	Electronic	Draft
CPB JH WGT Project	Tim Spawton	Rev 0	5/03/2021	Electronic	Original

Distribution List

1 electronic copy - CPB JH Joint Venture

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Executive Summary

Air quality monitoring for the West Gate Tunnel Project has been specifically established to develop a "baseline" of data from current local conditions. This baseline will be used to measure any changes once the tunnel opens. When the project opens, air quality monitoring will continue for up to 5 years.

The results of the West Gate Tunnel Project Ambient Air Quality Monitoring (AAQM) program for the period of 1 January 2021 to 31 January 2021 are presented below.

The following tables present the maximum measured concentration for each parameter at Stations 1, 2, 3, 4, 5 and 6 during the reporting period. The maximum concentration for each parameter is compared with the respective criteria.

Station 1 Summary January 2021

Parameter	Units	Averaging period	Maximum concentration	Air quality objective ^A	Exceedances ^B
PM _{2.5}	ug/m ³	24 hour	13	25	Nil
PM ₁₀	ug/m ³	24 hour	32	50	Nil

Note: A - SEPP(AAQ) objective

B - Exceedances refers to the number of individual days the criterion was exceeded at any station

Station 2, Station 3, Station 5 and Station 6 Summary January 2021

Deremeter	Units	Unito	Averaging	Maximum concentration				Air quality	Exceedances ^B
Parameter		period	Station 2	Station 3	Station 5	Station 6	objective ^A	Exceedances	
PM _{2.5}	ug/m ³	24 hour	13	12	12	14	36	Nil	
PM10	ug/m ³	24 hour	35	29	36	36	60	Nil	

Note:

A - SEPP(AQM) Intervention level

B - Exceedances refers to the number of individual days the criterion was exceeded at any station

Station 4 Summary January 2021

Parameter	Units	Averaging period	Maximum concentration	Air quality objective	Exceedances ^c
PM _{2.5}	ug/m ³	24 hour	17	36 ^A	Nil
PM10	ug/m ³	24 hour	45	60 ^A	Nil
NO ₂	ppb	1 hour	56	140 ^A	Nil
со	ppm	1 hour	0.85	29 ^A	Nil
Benzene	ppb	24 hour	<0.5	3.0 ^B	Nil
Toluene	ppb	24 hour	0.60	1000 ^B	Nil
Total xylene isomers	ppb	24 hour	3.80	250 ^B	Nil

Note:

A - SEPP(AQM) Intervention level

B - Air NEPM Monitoring investigation level

C - Exceedances refers to the number of individual days the criterion was exceeded at any station

January 2021 ambient air quality monitoring programme results were less than the respective air quality objectives for all parameters measured at all ambient air quality stations.

Data capture statistics for January 2021 were above 90 percent for all parameters at all AAQMS except for PM_{10} at Station 2 (Francis Street) due to failure of the flow controller. A replacement flow controller was fitted on 30^{th} January 2021.

A construction area (Millers Road exit ramp and noise wall relocation) is now adjacent Station 4, as a result, the measured pollutant concentrations may not be representative of traffic emissions.

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1.0 INTRODUCTION

Air quality monitoring for the West Gate Tunnel Project has been specifically established to develop a "baseline" of data from current local conditions. This baseline will be used to measure any changes once the tunnel opens. When the project opens, air quality monitoring will continue for up to 5 years.

The results of the West Gate Tunnel Project West Gate Tunnel Project Ambient Air Quality Monitoring (AAQM) program for the period of 1 January 2021 to 31 January 2021 are contained in the following report.

The AAQM program was conducted in accordance with the Environmental Performance Requirement (EPR) AQP4 for the Project and consists of six AAQM stations (AAQMS) monitoring the following ambient air quality indicators:

- continuous measurement of particulate matter with an equivalent aerodynamic diameter less than 10 microns (PM₁₀)
- continuous measurement of particulate matter with an equivalent aerodynamic diameter less than 2.5 microns (PM_{2.5})
- continuous measurement of wind speed and wind direction.

Additionally, one of the specified AAQMS (Primula Avenue) monitors the following additional air quality indicators in combination with PM_{10} and $PM_{2.5}$:

- continuous monitoring of oxides of nitrogen ([NO_x] comprising of nitrogen dioxide (NO₂) and nitric oxide [NO])
- continuous monitoring of carbon monoxide (CO)
- one in six day monitoring of benzene, toluene, ethylbenzene and xylene isomers (BTEX)
- continuous measurement of atmospheric pressure.

AAQMS Station 1 to Station 6 were installed and commissioned during the period 22/08/2018 to 12/10/2018. Specific installation dates can be found below in Section 2.1.

Details of the air quality indicators monitored at each AAQMS are provided in Table 1.

Site name	Location	Coordinates	Monitoring parameters
Station 1	Barbara Beyer Reserve, 2 Harris Street, Yarraville	-37.812730°S 144.900017°E	PM ₁₀ and PM _{2.5} Ambient temperature, relative humidity, wind speed and wind direction
Station 2	51-53 Francis Street	-37.821800°S 144.894383°E	PM ₁₀ and PM _{2.5} Ambient temperature, relative humidity, wind speed and wind direction
Station 3	Railway Lot 64, (part) 15 Goulburn Street, Yarraville	-37.814063°S 144.891320°E	PM ₁₀ and PM _{2.5} Ambient temperature, relative humidity, wind speed and wind direction
Station 4	44 Primula Avenue, Brooklyn	-37.824284°S 144.846425°E	PM ₁₀ and PM _{2.5} NO, NO ₂ , NOx and CO BTEX – one in six day sampling (24 hour average)

Table 1: AAQMS monitoring details

Site name	Location	Coordinates	Monitoring parameters
			Ambient temperature, relative humidity, atmospheric pressure, wind speed and wind direction
Station 5	Donald McLean Reserve, Spotswood	-37.826442°S 144.882133°E	PM ₁₀ and PM _{2.5} Ambient temperature, relative humidity, atmospheric pressure, wind speed and wind direction
Station 6	44 Millers Road Brooklyn	-37.821252°S 144.848878°E	PM ₁₀ and PM _{2.5} Ambient temperature and relative humidity

2.0 AAQMS DETAILS

2.1 Site locations

AAQMS Station 1 to Station 5 were installed and commissioned during the period 22/08/2018 to 31/08/2018. AAQMS Station 6 (Millers Road) was commissioned on 12/10/2018. Meteorological sensors (wind speed and direction) were installed later due to delays in calibration from the instrument supplier. AAQMS commissioning dates are provided in Table 2. Figure 1 presents the locations of the AAQMS.

Parameter	Station 1	Station 2	Station 3	Station 4	Station 5	Station 6
AAQMS	23/08/2018	22/08/2018	22/08/2018	22/08/2018	31/08/2018	12/10/2018
Wind speed & direction	07/09/2018	20/09/2018	14/09/2018	10/09/2018	17/09/2018	23/11/2018 ^A

A - wind sensor is not compliant with siting criteria specified in AS 3580.14



Figure 1: West Gate Tunnel AAQMS site locations

2.2 Siting assessment

Australian Standard AS/NZS 3580.1.1 "Methods for Sampling and Analysis of Ambient Air – Part 1.1. Guide to Siting Air Monitoring Equipment" provides general guidance for the siting of ambient air monitoring equipment and specific siting parameters for individual air pollutants. Table 3 provides a comparison between recommended criteria contained in the Standard for the parameters monitored at neighbourhood and peak monitoring stations with actual conditions at each AAQMS.

Station	Station 1	Station 2	Station 3	Station 4	Station 5	Station 6
Station type	Neighbourhood	Peak	Peak	Peak	Peak	Peak
Inlet height above ground level 1.0 m – 15 m	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark
Clear sky angle 120° (Neighbourhood)	\checkmark	-	-	-	-	-
Unrestricted 270° airflow around inlet (Neighbourhood)	\checkmark	-	-	-	-	-
Unrestricted 180° airflow around inlet (Peak)	-	\checkmark	\checkmark	\checkmark	\checkmark	~
Distance to supporting structure \geq 1 m	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark

Table 3: Australian standard AAQMS siting criteria compliance

Station	Station 1	Station 2	Station 3	Station 4	Station 5	Station 6
Station type	Neighbourhood	Peak	Peak	Peak	Peak	Peak
10 m from drip line of trees	~	\checkmark	\checkmark	\checkmark	\checkmark	×A
No extraneous sources nearby	~	\checkmark	\checkmark	×B	\checkmark	×C
Greater than 50 m from road (≤ 10,000 vehicles/day)	~	-	-	-	-	-
Greater than 2 m from road (Peak station)	-	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark

Note:

A Tree drip line is <3 m from sampler inlets and meteorological monitoring equipment

B Temporary construction area for Millers Road noise wall and exit ramp relocation works

C Residential chimney is <5 m from the sampler inlet.

2.3 Equipment specifications

Table 4 provides a list of the monitoring equipment installed at the AAQMS.

Parameter	Equipment item	Manufacturer	Model
PM _{2.5}	Beta Attenuation Monitor (BAM)	Thermo Fisher Scientific Inc.	5014i
PM10	Beta Attenuation Monitor (BAM)	Thermo Fisher Scientific Inc.	5014i
Oxides of Nitrogen	Chemiluminescence	Thermo Fisher Scientific Inc.	42i
Carbon Monoxide	Infra-red gas filter correlation	Thermo Fisher Scientific Inc.	48i
Temperature	Pt100 resistive platinum sensor	Thermo Fisher Scientific Inc.	5014i
BTEX	Summa canister	Restek	6 litre
Relative humidity	Capacitive thin film sensor	Thermo Fisher Scientific Inc.	5014i
Atmospheric Pressure	Beta Attenuation Monitor (BAM)	Thermo Fisher Scientific Inc.	5014i
Wind speed and wind direction	Ultrasonic anemometer	RM Young	Model 86000

3.0 AIR QUALITY CRITERIA

The ambient air quality criteria applicable to the West Gate Tunnel Project are derived from the following legislation:

- State Environment Protection Policy (Ambient Air Quality) [SEPP(AAQ)]
- State Environment Protection Policy (Air Quality Management) [SEPP(AQM)].
- National Environment Protection (Air Toxics) Measure Monitoring Investigation Levels (MILs)

SEPP(AAQ)

The SEPP(AAQ) adopts the requirements of the National Environment Protection (Ambient Air Quality) Measure (Air NEPM) and its environmental quality objectives (EQOs) for CO, NO₂, and particles (as PM₁₀ and PM_{2.5}). The SEPP(AAQ) EQOs apply to air quality within a region or sub-region considered to be representative of exposure of the general population in Victoria. These objectives have been adopted for the purposes of comparison with results from background/ neighbourhood monitoring stations for the West Gate Tunnel Project and are relevant to Station 1 (Yarraville Gardens).

SEPP(AQM)

The SEPP(AQM) sets out legislative requirements for managing and assessing air emissions in Victoria. The aim of the SEPP(AQM) is to ensure that prescribed air quality objectives are met and protect the beneficial uses of the air environment. Schedule B lists intervention levels which are used in the assessment of local or neighbourhood air monitoring data. Consistent with assessment of impacts described in the Environment Effects Statement for the West Gate Tunnel Project, the intervention levels have been adopted for purposes of comparison with results from peak monitoring stations for the West Gate Tunnel Project and are applicable to Station 2 (Francis Street), Station 3 (Railway Reserve), Station 4 (Primula Avenue), Station 5 (Donald McLean Reserve) and Station 6 (Millers Road).

NEPM (Air Toxics)

The aim of the Air Toxics NEPM is to gain a greater understanding of the levels of air toxics at specific locations where elevated concentrations are likely to occur and where the potential for significant human exposure exists. The Air Toxics NEPM established monitoring investigation levels (MILs) relevant for the West Gate Tunnel Project for benzene, toluene and xylene isomers. The MILs are used purposes of comparison with results from the air toxics monitored at Station 4 (Primula Avenue). Table 5 presents the air quality indicators and objectives for each AAQMS for the West Gate Tunnel Project.

Location	Pollutant	Units	Air Quality Objective	Averaging period
	DM		50	24 hour
	PM ₁₀		20	Annual
Station 1	DM	µg/m³	25	24 hour
	PM _{2.5}		8	Annual
Station 2 Station 3	PM ₁₀	(3	60	
Station 4 Station 5 Station 6	PM _{2.5}	µg/m³	36	24 hour
	со	ppm	29	1 hour
Station 4	NO ₂	ppb	140	1 hour
	Benzene	ppb	3	Annual

Table 5	5: Air	quality	indicators	and	objectives
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Location	Pollutant	Units	Air Quality Objective	Averaging period
	Taluana		1000	24 hour
	Toluene	ppb	100	Annual
Station 4	Ethylbenzene	ppb	NA	24 hour
			250	24 hour
	Xylene isomers	ppb	200	Annual

4.0 TEST METHODS

4.1 **Particulate matter (PM**_{2.5})

PM_{2.5} concentrations are determined using a Beta Attenuation Monitor (BAM).

Suspended particulate matter in ambient air is measured using the attenuation of beta rays as a surrogate for continuous mass determination. Beta rays are high energy electrons generated from the radioactive decay of the radon isotope Rn-222. When contacting particulate matter beta rays are either absorbed or their energy level is diminished. The relationship between the attenuation of beta rays between the source and detector is used to determine the mass density.

The BAM is equipped with a flow control and measurement system. The flow control system volumetrically controls the flowrate to 16.7 l/min. The flowrate is used with the mass density to calculate the particulate matter concentration.

The sampler is fitted with a size selective inlet, which separates particles with an equivalent aerodynamic diameter greater than 10 microns from the sample stream. An in-line $PM_{2.5}$ particle size separator is also fitted to further separate particles; only those with an equivalent aerodynamic diameter less than 2.5 microns can pass through the particle size separator to the filter for mass determination.

The PM_{2.5} monitoring method is based on the requirements contained within Australian Standard AS/NZS 3580.9.12 "*Methods for Sampling and Analysis of Ambient Air – Method 9.12: Determination of Suspended Particulate Matter – PM*_{2.5} Beta Attenuation Monitors" (NATA Laboratory Accreditation No. 1910).

4.2 Particulate matter (PM₁₀)

 PM_{10} concentrations are determined using a continuous BAM without an in-line $PM_{2.5}$ particle size separator. All other measurement processes remain the same as for the $PM_{2.5}$ test method.

The PM_{10} monitoring method is based on the requirements contained within Australian Standard AS/NZS 3580.9.11:2016 "*Methods for Sampling and Analysis of Ambient Air – Method 9.11: Determination of Suspended Particulate Matter – PM*₁₀ Beta Attenuation Monitors" (NATA Laboratory Accreditation No. 1910).

4.3 Nitrogen dioxide (NO₂)

Oxides of nitrogen concentrations were determined using a 42i Thermo Scientific chemiluminescence gas analyser.

Automatic calibrations are carried out daily against a NATA certified reference gas mixture. Manual calibrations are conducted at one month intervals.

The oxides of nitrogen (NO, NO₂ and NO_x) monitoring method is based on the requirements of Australian Standard AS 3580.5.1, *"Determination of Oxides of Nitrogen – Chemiluminescence Method"*.

4.4 Carbon monoxide (CO)

Carbon monoxide concentrations are determined using a 48i Thermo Scientific infra-red gas filter correlation analyser.

Automatic calibrations are carried out daily against a NATA certified reference gas mixture. Manual calibrations are conducted at one month intervals.

The carbon monoxide monitoring method is based on the requirements of Australian Standard AS 3580.7.1, *"Determination of Carbon Monoxide – Direct Reading Instrumental Method"*.

4.5 Volatile organic compounds (BTEX)

A sample is collected in an evacuated electro-polished and passivated stainless steel canister. Analysis involves separation by gas chromatography (GC) and measurement by mass selective (MS) detector.

The procedure for sampling Volatile Organic Compounds (VOCs) using evacuated canisters, and for the subsequent analysis, is described in USEPA Method TO-15 "Determination of Volatile Organic Compounds (VOCs) in air collected in specially-prepared canisters and analysed by Gas Chromatography/Mass Spectrometry (GC/MS)".

Samples were analysed by Queensland Health (NATA Laboratory Accreditation No. 41) based on USEPA method TO-15. The test method used was in accordance with Golder Source Test Method C9, "Canister (Evacuated) Sampling for VOC: In Ambient Air and Source Emissions".

4.6 Meteorological parameters

Monitoring of meteorological parameters; wind speed/direction, temperature, relative humidity, solar radiation and rainfall was conducted in accordance with Australian Standard AS 3580.14 "*Methods for Sampling and Analysis of Ambient Air – Part 14: Meteorological Monitoring for Ambient Air Quality Monitoring Applications*" (NATA Laboratory Accreditation No. 1910).

5.0 MEASUREMENT UNCERTAINTY

5.1 PM_{2.5}

The measurement uncertainty for PM_{2.5} by BAM is published by Thermo-Fisher as $\pm 2 \ \mu g/m^3$ (24 hour average).

5.2 PM₁₀

The measurement uncertainty for PM_{2.5} by BAM is published by Thermo-Fisher as $\pm 2 \mu g/m^3$ (24 hour average).

5.3 NO₂

The measurement uncertainty for NO, NO2 and NOx by Chemiluminescence is published in AS3580.5.1 as $\pm 10\%$ (24 hour average).

5.4 CO

The measurement uncertainty for CO by Infra-red gas filter correlation is published in AS3580.7.1 as ±10% (24 hour average).

5.5 Benzene

USEPA Method TO-15 cites the accuracy and precision for two ambient air quality studies conducted in the United States of America. The average replicate precision for a range of 16 compounds in both studies was 15%. Replicate precision was defined as the ratio of the average difference between replicates to the average value of replicates.

The reported accuracies for both studies ranged between ± 4 % and ± 31 %. The average accuracy for both studies for the range of 16 compounds was ± 11 %. Accuracy is defined as the ratio of the difference between expected and observed audit results to the expected audit result.

5.6 Meteorological parameters

The estimated measurement uncertainty for each of the parameters is presented in Table 6.

Table 6: Meteorological parameters measurement uncertainty

Parameter	Measurement uncertainty ^A			
Wind speed	Greater of ±0.6 m/s or 5%			
Wind direction	±5°			
Barometric pressure	±3 hPa			
Temperature	±6%			
Relative humidity	±5 – 7%RH			

Note:

A Measurement uncertainty estimates are as published in AS3580.14 "Methods for Sampling and Analysis of Ambient Air – Part 14 Meteorological Monitoring for Ambient Air Quality Monitoring Applications".

5.7 Calibration and maintenance

Sample flow rate calibration was conducted on a monthly basis using a NATA calibrated primary standard flowmeter. Calibration details for the reporting period are presented in Table 7.

Location	Parameter	Last Calibration Date	Calibration Type
	PM ₁₀	28/01/2021	Monthly
Station 1	PM _{2.5}	28/01/2021	Monthly
	Wind speed and direction	17/08/2020	Two yearly
	PM ₁₀	28/01/2021	Monthly
Station 2	PM _{2.5}	28/01/2021	Monthly
	Wind speed and direction	30/07/2020	Two yearly
	PM ₁₀	28/01/2021	Monthly
Station 3	PM _{2.5}	28/01/2021	Monthly
	Wind speed and direction	15/09/2020	Two yearly
	PM ₁₀	1/02/2021	Monthly
Station 4	PM _{2.5}	1/02/2021	Monthly
	NO/ NO ₂ / NOx	1/02/2021	Monthly
	СО	1/02/2021	Monthly

Table 7: Calibrations

Location	Parameter	Last Calibration Date	Calibration Type	
Station 4	BTEX	NA	Flow-controllers and canisters certified by lab	
	Wind speed and direction	24/08/2020	Two yearly	
	PM10	30/01/2021	Monthly	
Station 5	PM _{2.5}	30/01/2021	Monthly	
	Wind speed and direction	05/09/2020	Two yearly	
	PM ₁₀	30/01/2021	Monthly	
Station 6	PM _{2.5}	30/01/2021	Monthly	

6.0 **RESULTS**

The monitoring results for 1 January 2021 to 31 January 2021 are presented in the following sections.

6.1 Particulate matter (BAM PM_{2.5} & PM₁₀)

 $PM_{2.5}$ and PM_{10} were continuously monitored and 5-minute averages logged. The 5-minute average data was transformed to 24 hour averages for reporting.

 $PM_{2.5}$ and PM_{10} concentration statistics from the reporting period for Station 1 to Station 6 are presented in Table 8 to Table 13. The 24 hour average plots for Station 1 to Station 6 are presented in Figure 2 to Figure 7.

6.1.1 Station 1 – Yarraville Gardens

Table 8: Station 1 (Yarraville Gardens AAQMS) PM2.5 and PM10 percentiles (24 hour average)

Parameter	Concentration (µg/m³) ^A						Air quality objective ^B	
	Maximum	99 th	98 th	95 th	90 th	75 th	50th	(µg/m³)
PM _{2.5}	13	13	13	12	12	8.9	7.3	25
PM ₁₀	32	31	31	29	28	22	16	50

Note:

A Micrograms per cubic metre at 0°C and 101.3 kPa B SEPP(AAQ) Objective Values rounded to two significant figures.

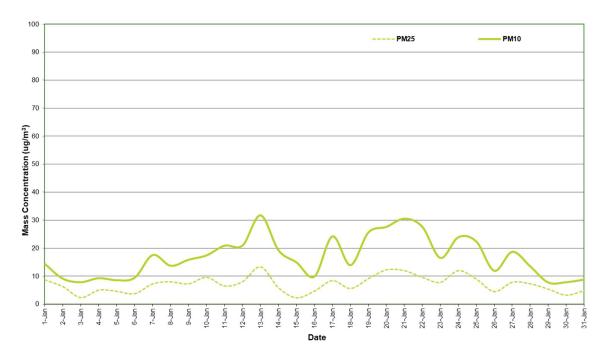


Figure 2: Station 1 PM_{2.5} and PM₁₀ concentration (24 hour average) – January 2021

6.1.2 **Station 2 – Francis Street**

Table 9: Station 2 (Francis Street AAQMS) PM2.5 and PM10 percentiles (24 hour average)

Parameter		Air quality objective ^B						
Мах	Maximum	99 th	98 th	95 th	90 th	75 th	50th	(µg/m³)
PM _{2.5}	13	13	12	12	12	9.1	6.5	36
PM ₁₀	35	35	34	34	31	25	18	60

Note:

A Micrograms per cubic metre at 0°C and 101.3 kPa B SEPP(AQM) Intervention level Values rounded to two significant figures.

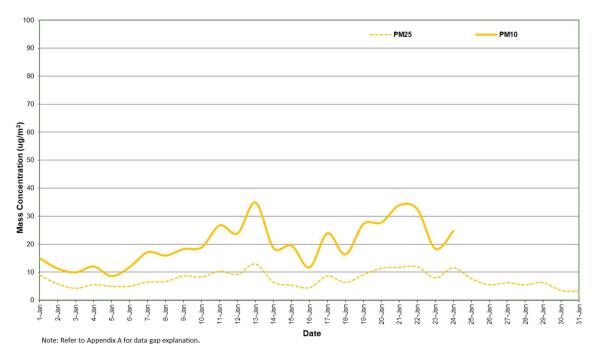


Figure 3: Station 2 PM_{2.5} and PM₁₀ concentration (24 Hour Average) – January 2021

Station 3 – Railway Reserve 6.1.3

Table 10: Station 3 (Railway Reserve AAQMS) PM2.5 and PM10 percentiles (24 hour average)

Parameter		Concentration (μg/m³) ^A								
Ма	Maximum	99 th	98 th	95 th	90 th	75 th	50th	(µg/m³)		
PM _{2.5}	12	12	12	12	11	8.5	6.6	36		
PM ₁₀	29	29	28	28	27	20	16	60		

Note:

A Micrograms per cubic metre at 0°C and 101.3 kPa B SEPP(AQM) Intervention level Values rounded to two significant figures.

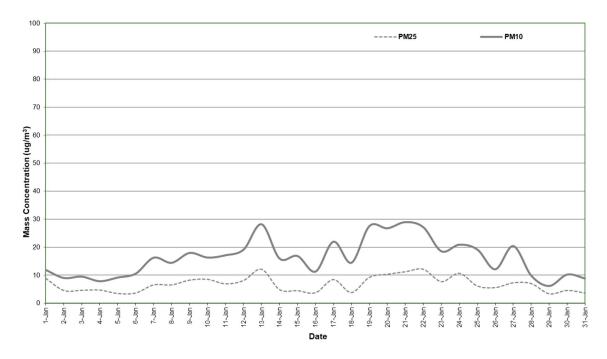


Figure 4: Station 3 PM_{2.5} and PM₁₀ concentration (24 hour average) – January 2021

6.1.4 Station 4 – Primula Avenue

Table 11: Station 4 (Primula Avenue AAQMS) PM2.5 and PM10 percentiles (24 hour average)

Parameter		Concentration (μg/m³) ^A								
Maximum	Maximum	99 th	98 th	95 th	90 th	75 th	50th	(µg/m³)		
PM _{2.5}	17	16	15	13	12	9.5	7.7	36		
PM ₁₀	45	43	41	38	36	25	20	60		

Note:

A Micrograms per cubic metre at 0°C and 101.3 kPa B SEPP(AQM) Intervention level Values are rounded to two significant figures.

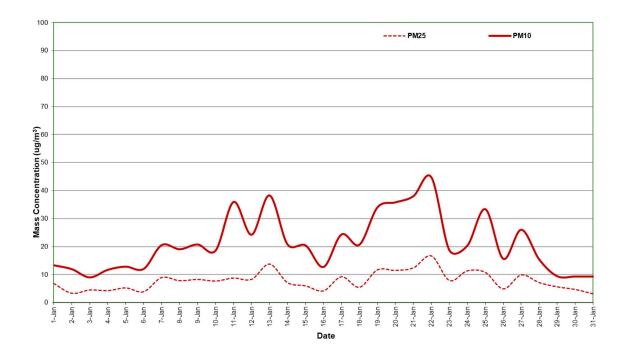


Figure 5: Station 4 PM_{2.5} and PM₁₀ concentration (24 hour average) – January 2021

6.1.5 Station 5 – Donald McLean Reserve

Table 12: Station 5 (Donald McLean Reserve AAQMS) PM_{2.5} and PM₁₀ percentiles (24 hour average)

Parameter		Air quality objective ^B						
	Maximum	99 th	98 th	95 th	90 th	75 th	50th	(µg/m³)
PM _{2.5}	12	12	12	11	11	7.8	6.4	36
PM ₁₀	36	36	35	33	31	23	17	60

Note:

A Micrograms per cubic metre at 0°C and 101.3 kPa B SEPP(AQM) Intervention level Values rounded to two significant figures.

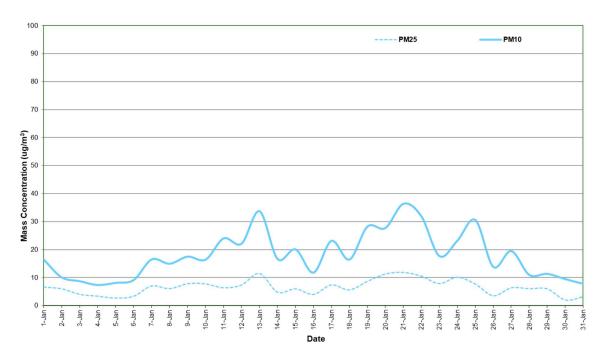


Figure 6: Station 5 PM_{2.5} and PM₁₀ concentration (24 hour average) – January 2021

6.1.6 Station 6 – Millers Road

Table 13: Station 6 (Millers Road AAQMS) PM2.5 and PM10 percentiles (24 hour average)

Parameter		Air quality objective ^B						
М	Maximum	99 th	98 th	95 th	90 th	75 th	50th	(µg/m³)
PM _{2.5}	14	14	14	13	12	9.1	7.5	36
PM10	36	35	35	34	34	23	18	60

Note:

A Micrograms per cubic metre at 0°C and 101.3 kPa B SEPP(AQM) Intervention level Values rounded to two significant figures.

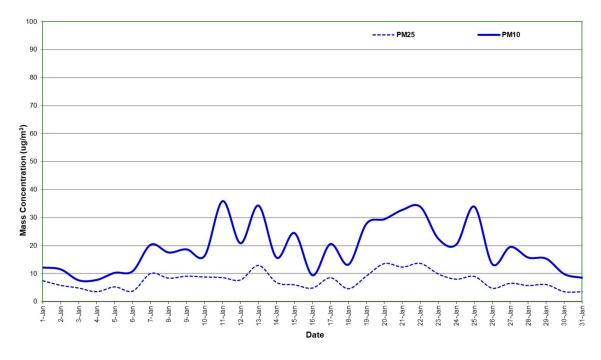


Figure 7: Station 6 PM_{2.5} and PM₁₀ concentration (24 hour average) – January 2021

6.1.7 Combined PM_{2.5} mass concentrations

Combined plots of the AAQMS PM_{2.5} and PM₁₀ are presented in Figure 8 and Figure 9 respectively.

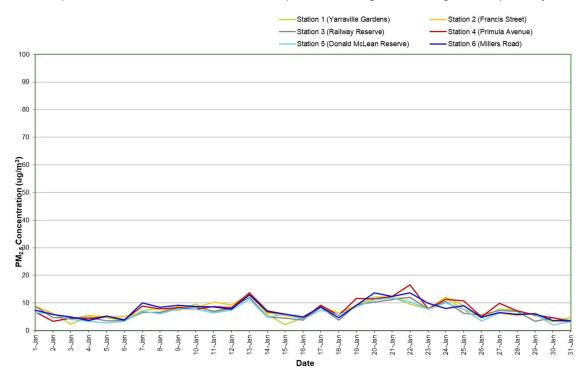


Figure 8: Combined PM2.5 concentration (24 hour average) – January 2021

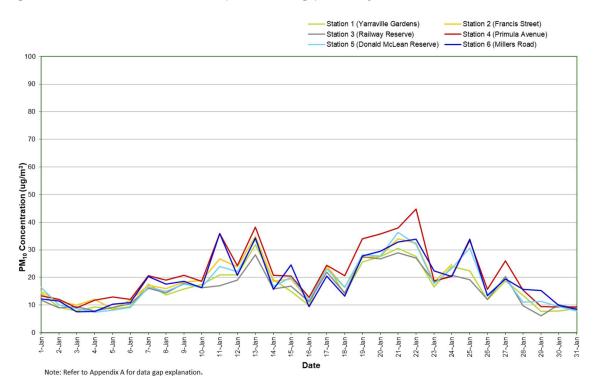


Figure 9: Combined PM_{10} concentration (24 hour average) – January 2021

6.2 Nitrogen dioxide (NO₂)

 NO_2 (1 hour average) mass concentration statistics for the reporting period are given in Table 14. A plot of NO_2 (1 hour average) mass concentration for the reporting period is presented in Figure 10.

Table 14: Station 4 (Primula Avenue AAQMS) NO2 percentiles (1 hour average)

Parameter			SEPP (AQM) intervention level					
	Maximum	99 th	98 th	95 th	90 th	75 th	50th	(ppb)
NO ₂	56	37	33	25	19	13	9.0	140

Note:

A Parts per billion

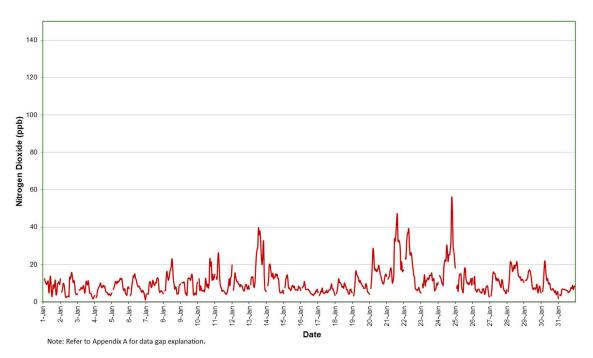


Figure 10: Station 4 NO₂ concentration (1 hour average) – January 2021

6.3 Carbon monoxide (CO)

CO (1 hour average) mass concentration statistics for the reporting period are given in Table 15. A plot of CO (1 hour average) concentration for the reporting period is presented in Figure 11.

Table 15: Station 4 (Primula Avenue AAQMS) CO percentiles (1 hour average)

Parameter		SEPP (AQM) intervention level						
	Maximum	99 th	98 th	95 th	90 th	75 th	50th	(ppm)
со	0.85	0.69	0.64	0.59	0.55	0.50	0.41	29

Note:

A Parts per million

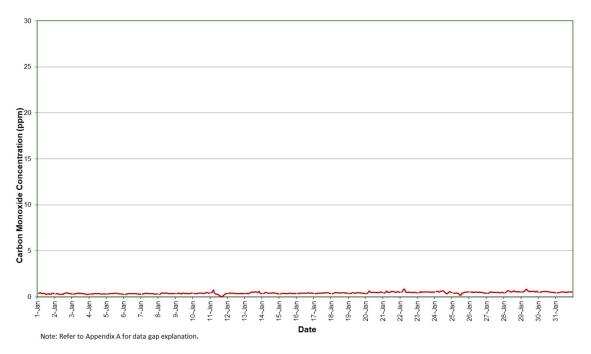


Figure 11: Station 4 CO concentration (1 hour average) – January 2021

6.4 Volatile organic compounds (BTEX)

VOC samples were collected from Station 4 (Primula Avenue), in an evacuated electro-polished and passivated stainless steel canister. Analysis involves separation by gas chromatography (GC) and measurement by mass selective (MS) detector.

The procedure for sampling Volatile Organic Compounds (VOCs) using evacuated canisters, and for the subsequent analysis, is described in USEPA Method TO-15 "Determination of Volatile Organic Compounds (VOCs) in air collected in specially-prepared canisters and analysed by Gas Chromatography/Mass Spectrometry (GC/MS)".

Samples were analysed by Queensland Health (NATA Laboratory Accreditation No. 41) based on USEPA method TO-15 (Laboratory Report Nos. SSP72931, SSP73134 and SSP73217).

The test method used was in accordance with Golder Source Test Method C9, "Canister (Evacuated) Sampling for VOC: In Ambient Air and Source Emissions".

BTEX (24 hour average) mass concentration statistics for the reporting period are given in Table 16. Laboratory certificates are presented in APPENDIX B.

Date	Sample no.	Benzene (ppb)	Toluene (ppb)	Ethylbenzene (ppb)	Total xylene isomers (ppb)
04/01/2021	20-2217	<0.5	<0.5	<0.5	<1
10/01/2021	21-040	<0.5	<0.5	<0.5	<1
16/01/2021	21-041	<0.5	<0.5	<0.5	<1
22/01/2021	21-051	<0.5	0.6	0.7	3.8
28/01/2021	21-052	<0.5	<0.5	<0.5	<1
NEPM MIL ^A		3.0 ^B	1000	NA	250

Table 16: Station 4 - Primula Avenue AAQMS BTEX concentrations (24 hour average)

Note:

A National Environment Protection Measure (Air Toxics) Monitoring Investigation Level

B Annual average

Sample analysis conducted by Queensland Health, NATA Accreditation No. 41/ Eurofins Pty Ltd, NATA Accreditation No. 1261. Analysis dates: 1/02/2021 (20-2217), 2/02/2021 (21-040, 21-041), 12/02/2021 (21-051, 21-052).

6.5 Meteorological parameters

6.5.1 Ambient temperature

Ambient Temperature data for all AAQMS sites are presented in Figure 12 for the reporting period.

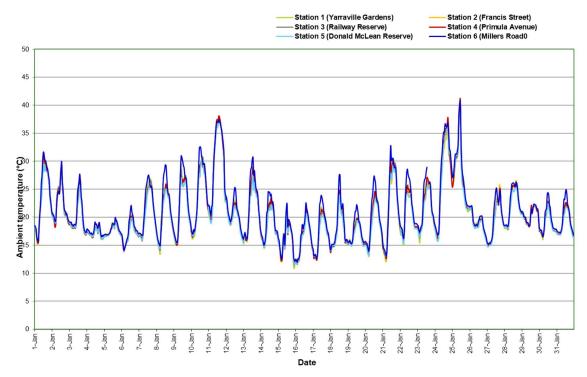


Figure 12: Ambient temperature (1 hour average) All AAQMS - January 2021

6.5.2 Relative humidity

Relative Humidity data for all AAQMS sites are presented in Figure 13 for the reporting period.

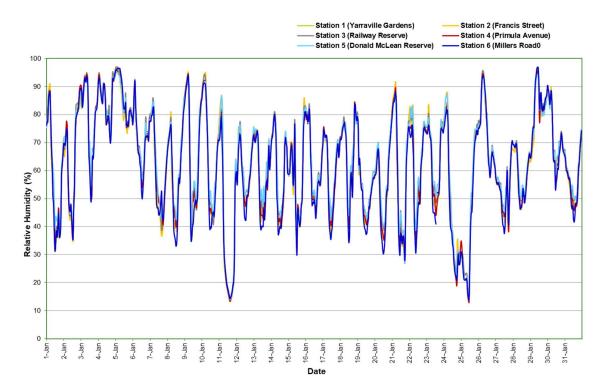


Figure 13: Relative humidity (1 hour average) All AAQMs - January 2021

6.5.3 Atmospheric pressure

Atmospheric pressure data for Station 4 (Primula Avenue AAQMS) is presented in Figure 14 for the reporting period.

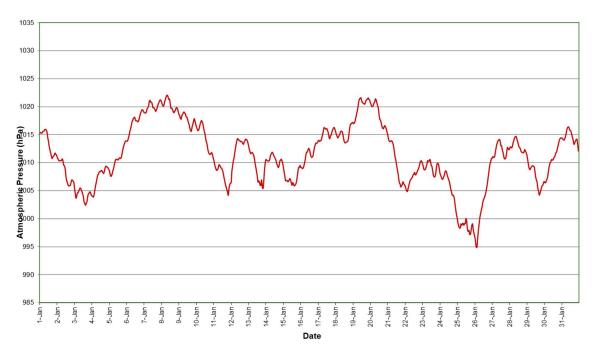


Figure 14: Atmospheric pressure (1 hour average) Station 4 Primula Avenue – January 2021

6.5.4 Wind speed

Wind Speed data for all AAQMS sites are presented in Figure 15 for the reporting period.

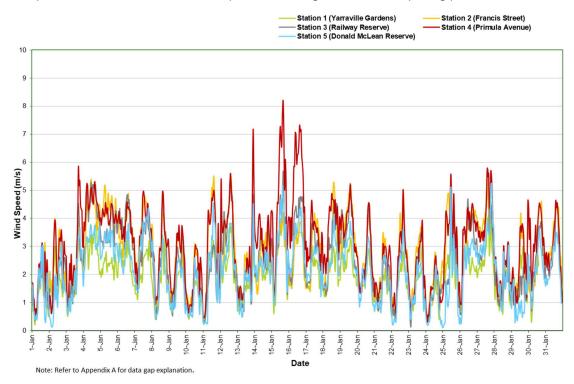


Figure 15: Wind speed (1 hour average) All AAQMs - January 2021

6.5.5 Wind rose – Station 1 (Yarraville Gardens)

A wind rose (1 hour average) for Yarraville Gardens AAQMS is presented in Figure 16.

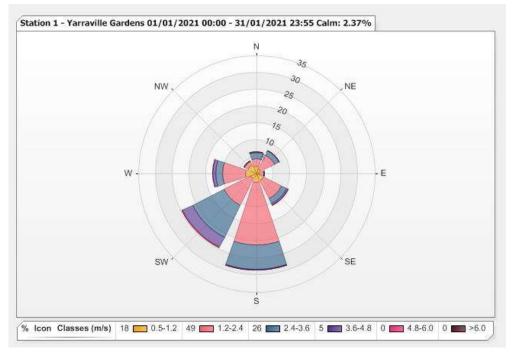


Figure 16: Wind speed (1 hour average) Station 1 - Yarraville Gardens

6.5.6 Wind rose – Station 2 (Francis Street)

A wind rose (1 hour average) for Station 2 (Francis Street AAQMS) is presented in Figure 17.

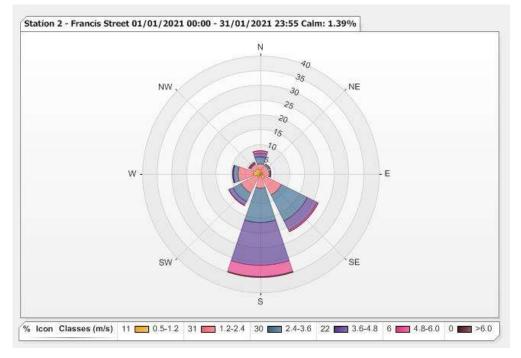


Figure 17: Wind speed (1 hour average) Station 2 - Francis Street

6.5.7 Wind rose – Station 3 (Railway Reserve)

A wind rose (1 hour average) for Station 3 (Railway Reserve AAQMS) is presented in Figure 18.

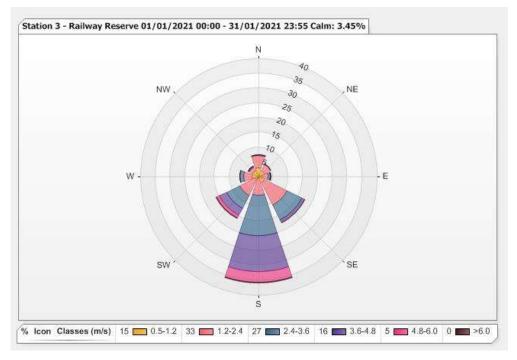


Figure 18: Wind speed (1 hour average) Station 3 Railway Reserve

6.5.8 Wind rose – Station 4 (Primula Avenue)

A wind rose (1 hour average) for Station 4 (Primula Avenue AAQMS) is presented in Figure 19.

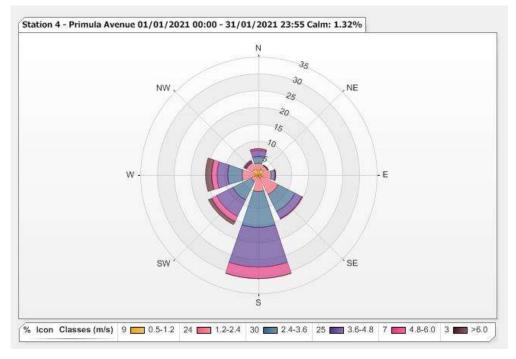


Figure 19: Wind speed (1 hour average) Station 4 Primula Avenue

6.5.9 Wind rose – Station 5 (Donald McLean Reserve)

A wind rose (1 hour average) for Station 5 (Donald McLean Reserve AAQMS) is presented in Figure 20.

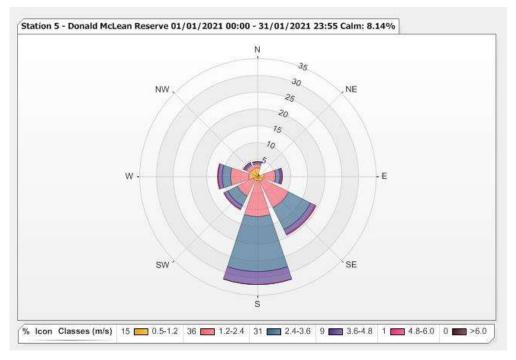


Figure 20: Wind speed (1 hour average) Station 5 Donald McLean Reserve

7.0 QUALITY ASSURANCE

7.1 Data capture

Data capture is defined as the number of valid data periods collected divided by the number of available data periods. Valid data excludes periods where the instrument is unavailable due to calibration and maintenance and excludes periods where the data has been rejected due to quality assurance/data validation procedures.

Automatic calibrations are conducted for NO_2 and CO daily to monitor and correct instrument drift where necessary. NO_2 and CO automatic calibrations are conducted once per day between 01:00 and 01:45 hours.

Data capture statistics for the reporting period 1 January to 31 January 2021 are shown in Table 17. Averages were only collected for those periods where the 5 minute data constituted 75% data capture. Data capture statistics for January 2021 were above 90 percent for all parameters at all stations except for PM₁₀ at Station 2 (Francis Street) due to a defective proportional flow controller.

Parameter	Averaging period	Station	Collected periods	Available periods	Data capture¹
PM _{2.5}	24 hour	1 – Yarraville Gardens	31	31	100%
	24 hour	2 – Francis Street	31	31	100%
	24 hour	3 – Railway Reserve	31	31	100%
	24 hour	4 – Primula Avenue	31	31	100%
	24 hour	5 – Donald McLean Reserve	31	31	100%
	24 hour	6 – Millers Road	31	31	100%
PM ₁₀	24 hour	1 – Yarraville Gardens	31	31	100%
	24 hour	2 – Francis Street	25	31	81%
	24 hour	3 – Railway Reserve	31	31	100%
	24 hour	4 – Primula Avenue	31	31	100%
	24 hour	5 – Donald McLean Reserve	31	31	100%
	24 hour	6 – Millers Road	31	31	100%
NO ₂	1 hour	4 – Primula Avenue	713	744	96%
СО	1 hour	4 – Primula Avenue	713	744	96%
Ambient temperature	1 hour	1 – Yarraville Gardens	743	744	100%
& relative humidity	1 hour	2 – Francis Street	744	744	100%
	1 hour	3 – Railway Reserve	743	744	100%
	1 hour	4 – Primula Avenue	744	744	100%
	1 hour	5 – Donald McLean Reserve	744	744	100%
	1 hour	6 – Millers Road	744	744	100%

Table 17: Data Capture

Atmospheric pressure	1 hour	4 – Primula Avenue	744	744	100%
Wind speed and direction	1 hour	1 – Yarraville Gardens	711	744	96%
direction	1 hour	2 – Francis Street	744	744	100%
	1 hour	3 – Railway Reserve	738	744	99%
	1 hour	4 – Primula Avenue	744	744	100%
	1 hour	5 – Donald McLean Reserve	744	744	100%

Note:

1 Rounded to two significant figures

7.2 Data validation

Data contained in this report has been validated against performance and calibration requirements for each instrument. Data during commissioning, maintenance and calibration periods has been removed from the validated data sets. APPENDIX A lists the data exceptions for all AAQMS. Missing data periods during automatic calibrations of the gaseous atmospheric contaminants NO₂ and CO are not shown.

8.0 **DISCUSSION**

Table 18 presents the maximum measured concentration during the reporting period at Station 1 for $PM_{2.5}$ and PM_{10} compared with the respective criteria.

Parameter	Units	Averaging period	Maximum concentration	Air quality objective ^A	Exceedances ^B
PM _{2.5}	ug/m ³	24 hour	13	25	Nil
PM ₁₀	ug/m ³	24 hour	32	50	Nil

Notes:

A - SEPP(AAQ) objective

B - Exceedances refers to the number of individual days the criterion was exceeded at any station.

Table 19 presents the maximum measured concentration during the reporting period at Station 2, Station 3, Station 5 and Station 6 for $PM_{2.5}$ and PM_{10} compared with the respective criteria.

Parameter	Units	Averaging period	Maximum concentration				Air quality	Exceedances ^B
			Station 2	Station 3	Station 5	Station 6	objective ^A	Exceedances
PM _{2.5}	ug/m ³	24 hour	13	12	12	14	36	Nil
PM ₁₀	ug/m ³	24 hour	35	29	36	36	60	Nil

Notes:

A - SEPP(AQM) Intervention level

B - Exceedances refers to the number of individual days the criterion was exceeded at any station.

Table 20 presents maximum measured concentration during the reporting period at Station 4 for PM_{2.5}, PM₁₀, NO₂, CO and BTEX compared with the respective criteria.

Parameter	Units	Averaging period	Maximum concentration	Air quality objective	Exceedances ^c
PM _{2.5}	ug/m ³	24 hour	17	36 ^A	Nil
PM ₁₀	ug/m ³	24 hour	45	60 ^A	Nil
NO ₂	ppb	1 hour	56	140 ^A	Nil
СО	ppm	1 hour	0.85	29 ^A	Nil
Benzene	ppb	24 hour	<0.5	3.0 ^B	Nil
Toluene	ppb	24 hour	0.60	1000 ^B	Nil
Total xylene isomers	ppb	24 hour	3.80	250 ^B	Nil

Table 20: Station 4 Summary – January 2021

Notes:

A - SEPP(AQM) Intervention level

B - Air NEPM Monitoring investigation level

C - Exceedances refers to the number of individual days the criterion was exceeded at any station.

January 2021 ambient air quality monitoring programme results were less than the respective air quality objectives for all parameters measured at all ambient air quality stations.

Data capture statistics for January 2021 were above 90 percent for all parameters at all AAQMS except for PM_{10} at Station 2 (Francis Street) due to failure of the flow controller. A replacement flow controller was fitted on 30^{th} January 2021.

A construction area (Millers Road exit ramp and noise wall relocation) is now adjacent Station 4, as a result, the measured pollutant concentrations may not be representative of traffic emissions.

9.0 IMPORTANT INFORMATION RELATING TO THIS REPORT

Your attention is drawn to the document titled - "Important Information Relating to this Report", which is included in APPENDIX C of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

Signature Page

Golder Associates Pty Ltd

Autore 7

Anthony Myszka Environmental Technician

AM/MDT/am

M.D. ful.

Mark Tulau Senior Environmental Scientist

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APPENDIX A

Data Exceptions

Date from	Date to	Station	Parameters	Reason
25/01/2021 00:05	30/01/2021 14:00	2	PM ₁₀	Sample flow controller failed
28/01/2021 12:05	28/01/2021 13:05	3	PM _{2.5} / PM ₁₀	Maintenance / calibration
28/01/2021 13:20	28/01/2021 13:55	1	PM _{2.5} / PM ₁₀	Maintenance / calibration
28/01/2021 14:50	28/01/2021 17:40	2	PM _{2.5}	Maintenance / calibration
30/01/2021 11:05	30/01/2021 11:25	5	PM _{2.5}	Maintenance / calibration
30/01/2021 11:10	30/01/2021 16:40	5	PM10	Calibration / stabilisation
30/01/2021 12:50	30/01/2021 13:00	6	PM _{2.5} / PM ₁₀	Maintenance / calibration
30/01/2021 14:50	1/02/2021 0:00	1	Wind Sensor	Data logger error

Note: 1 - In the opinion of the data reviewer

APPENDIX B

Laboratory Certificates



Forensic and Scientific Services

HealthSupport Queensland

CERTIFICATE OF ANALYSIS

CLIENT: G B

Golder Associates Building 7, Botanicca Corporate Park 570 - 588 Swan Street Richmond VIC 3121

ATTN: Laurent Campbell

Laboratory Reference Client Order Number Quote Number Client Project Client Batch Reference Date Received Date Commenced Laboratory Number/s : SSP72931 : PO24154 : n/a : 1789878 : n/a

: 15-Jan-2021 : 01-Feb-2021

: 20KS1594-1596

CC: Anthony Myszka

Submitting Authority	: Golder Associates
Number of Samples	: Four (4) Summa canisters
Reason for Analysis	: Analysis of Volatile Organic Compounds (VOCs) in air
Method/s of Analysis	 QIS28237 – Identification, confirmation and quantitation of Volatile Organic Compounds (VOCs) by GCMS using an in-house method as per EPA method TO15
Remarks	: Sample details and results are summarised in Table 1.

David Pass Senior Chemist, Organics Laboratory 2nd February 2021





SSP72931

This report overrides all previous reports. The results relate solely to the sample/s as received and are limited to the specific tests undertaken as listed on the report. The results of this report are confidential and are not to be used or disclosed to any other person or used for any other purpose, whether directly or indirectly, unless that use is disclosed or the purpose is expressly authorised in writing by Queensland Health and the named recipient on this report. To the fullest extent permitted by law, Queensland Health will not be liable for any loss or claim (including legal costs calculated on an indemnity basis) which arise because of (a) problems related to the merchantability, fitness or quality of the sample/s, or (b) any negligent or unlawful act or omissions by Queensland Health under this agreement (including the timing and/or method under which the sample/s were taken, stored or transported).
Enquiries David Pass 39 Kessels Road PO Box 594 Phone (+617) 3096 2990

Phone (+61 7) 3096 2854 Email David.Pass@health.qld.gov.au 39 Kessels Road Coopers Plains QLD 4108 AUSTRALIA PO Box 594 Archerfield QLD 4108 AUSTRALIA
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 Fax
 (+61 7) 3096 2977

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 FSS@health.qld.gov.au

CERTIFICATE OF ANALYSIS

Laboratory Reference: SSP72931 Laboratory Number: 21KS82-85

Table 1: Results for Summa canister analysis

Sileo Canister	Client Reference				2020-2214	2020-2215	2020-2216	2020-2217
n/a 17/12/2020 17/12/2020 ambient air ambient air ambient air Compounds (VOCs) by GCMS Units Reporting 21KS82 Limit 21KS82 ppbv 0.5 < LOR ppbv 0.5 < LOR ppbv 0.5 < LOR	96				Silco Canister #1733	Silco Canister #5406	Silco Canister #1753	Silco Canister #1992
iic Compounds (VOCs) by GCMS Units Reporting 21KS82 Ppbv 0.5 < LOR 2 Ppbv 0.5 < LOR 2 Ppb 0	ime / Date				n/a 17/12/2020	n/a 29/12/2020	n/a 31/12/2020	n/a 04/01/2021
Units Reporting 21KS82 Ppbv 0.5 < LOR ppbv 0.5 < LOR ppbv 0.5 < LOR ppbv 0.5 < LOR	scription				ambient air	ambient air	ambient air	ambient air
Benzene ppbv 0.5 < LOR	latile Organic Compou	inds (VOCs) by GCMS	Units	Reporting Limit	21KS82	21KS83	21KS84	21KS85
Toluene ppbv 0.5 < LOR Ethylbenzene ppbv 0.5 < LOR	Izene		vdaq	0.5	< LOR	< LOR	< LOR	< LOR
Ethylbenzene ppbv 0.5 < LOR m- & p-Xylene ppbv 0.5 < LOR	uene		vdqq	0.5	< LOR	< LOR	< LOR	< LOR
m- & p-Xylene ppbv 0.5 < LOR	ylbenzene		vdqq	0.5	< LOR	< LOR	< LOR	< LOR
	& p-Xylene		vddd	0.5	< LOR	< LOR	< LOR	< LOR
	o-Xylene		vclqq	0.5	< LOR	< LOR	< LOR	< LOR

Temperature and atmospheric pressure at time of sampling unavailable

This report overrides all previous reports. The results relate solely to the sample/s as received and are limited to the specific tests undertaken as listed on the report. The results of this report are confidential and are not to be used or disclosed to any other person or used for any other purpose, whether directly understate that use is expressly authorised in writing by Queensland Health and the named recipient on this report. To the fullest extent permitted by law, Queensland Health will not be liable for any loss or claim (including legal costs calculated on an intercept or indirectly unders is expressly authorised in writing by Queensland Health and the named recipient on this report. To the fullest extent permitted by law, Queensland Health will not be liable for any loss or claim (including legal costs calculated on an intercept or indirectly unders is expressly authorised in writing by Queensland Health and the named recipient on this report. To the fullest extent permitted by law, Queensland Health will not be liable for any loss or claim (including legal costs calculated on an indirectly unders is expressly authoring legal costs calculated to any loss or claim (including legal costs calculated to the merchantability, fitness or quality of the sample/s, or (b) any negligent or unlawful act or omissions by Queensland Health that is connected with any activities or services provided by Queensland Health under this agreement (including the timing and/or method under which the sample/s were taken, stored or transported). **SSP72931**

Page 2 of 2



Forensic and Scientific Services

: SSP73134 : PO24154 : n/a : 1789878

: 01-Feb-2021

: 02-Feb-2021 : 21KS141-142

: n/a

Laboratory Number/s

Health Support Oueensland

CERTIFICATE OF ANALYSIS

CLIENT:	Golder Associates Building 7, Botanicca Corporate Park	Laboratory Reference Client Order Number
	570 - 588 Swan Street Richmond VIC 3121	Quote Number Client Project Client Batch Reference
	ATTN: Laurent Campbell	Date Received Date Commenced

CC: Anthony Myszka

Submitting Authority	: Golder Associates
Number of Samples	: Two (2) Summa canisters
Reason for Analysis	: Analysis of Volatile Organic Compounds (VOCs) in air
Method/s of Analysis	 QIS28237 – Identification, confirmation and quantitation of Volatile Organic Compounds (VOCs) by GCMS using an in-house method as per EPA method TO15
Remarks	: Sample details and results are summarised in Table 1.

David Pass Senior Chemist, Organics Laboratory 10th February 2021





SSP73134

This report overrides all previous reports. The results relate solely to the sample/s as received and are limited to the specific tests undertaken as listed on the report. The results of this report are confidential and are not to be used or disclosed to any other person or used for any other purpose, whether directly or indirectly, unless that use is disclosed or the purpose is expressly authorised in writing by Queensland Health and the named recipient on this report. To the fullest extent permitted by law, Queensland Health will not be liable for any loss or claim (including legal costs calculated on an indemnity basis) which arise because of (a) problems related to the merchantability, fitness or quality of the sample/s, or (b) any negligent or unlawful act or omissions by Queensland Health that is connected with any activities or services provided by Queensland Health under this agreement (including the timing and/or method under which the sample/s were taken, stored or transported).

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CERTIFICATE OF ANALYSIS

Laboratory Reference: SSP73134 Laboratory Number: 21KS141-142

Table 1: Results for Summa canister analysis

Client F	Reference			21-40	21-41
Sample	Туре			Silco Canister #1994	Silco Canister #1736
Samplin	ng Time / Date			n/a 10/01/2021	n/a 16/01/2021
Sample	Description	ambient air	ambient air		
Method	Volatile Organic Compounds (VOCs) by GCMS	Units	Reporting Limit	21KS141	21KS142
28237	Benzene	ppbv	0.5	< LOR	< LOR
28237	Toluene	ppbv	0.5	< LOR	< LOR
28237	Ethylbenzene	ppbv	0.5	< LOR	< LOR
28237	m- & p-Xylene	ppbv	0.5	< LOR	< LOR
28237	o-Xylene	ppbv	0.5	< LOR	< LOR

Temperature and atmospheric pressure at time of sampling unavailable

This report overrides all previous reports. The results relate solely to the sample/s as received and are limited to the specific tests undertaken as listed on the report. The results of this report are confidential and are not to be used or disclosed to any other person or used for any other purpose, whether directly or indirectly, unless that use is disclosed or the purpose is expressly authorised in writing by Queensland Health and the named recipient on this report. To the fullest extent permitted by law, Queensland Health will not be liable for any loss or claim (including legal costs calculated on an indemnity basis) which arise because of (a) problems related to the merchantability, fitness or quality of the sample/s, or (b) any negligent or unlawful act or omissions by Queensland Health that is connected with any activities or services provided by Queensland Health under this agreement (including the timing and/or method under which the sample/s were taken, stored or transported).



Forensic and Scientific Services

HealthSupport Queensland

CERTIFICATE OF ANALYSIS

CLIENT: Golder Associates Building 7, Botanicca Corporate Park 570 - 588 Swan Street Richmond VIC 3121

ATTN: Laurent Campbell

Laboratory Reference: SSClient Order Number: POQuote Number: n/aClient Project: 178Client Batch Reference: n/aDate Received: 05-Date Commenced: 12-Laboratory Number/s: 214

: SSP73217 : PO24154 : n/a : 1789878 : n/a : 05-Feb-2021 : 12-Feb-2021 : 21KS169-170

CC: Anthony Myszka

Submitting Authority	: Golder Associates
Number of Samples	: Two (2) Summa canisters
Reason for Analysis	: Analysis of Volatile Organic Compounds (VOCs) in air
Method/s of Analysis	 QIS28237 – Identification, confirmation and quantitation of Volatile Organic Compounds (VOCs) by GCMS using an in-house method as per EPA method TO15
Remarks	: Sample details and results are summarised in Table 1.

David Pass Senior Chemist, Organics Laboratory 16th February 2021



7SSP73217

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Enquiries David Pass Phone (+61 7) 3096 2854 Email David.Pass@health.qld.gov.au 39 Kessels Road Coopers Plains QLD 4108 AUSTRALIA PO Box 594 Archerfield QLD 4108 AUSTRALIA Phone (+61 7) 3096 2990 Fax (+61 7) 3096 2977 Email FSS@health.qld.gov.au

CERTIFICATE OF ANALYSIS

Laboratory Reference: SSP73217 Laboratory Number: 21KS169-170

Table 1: Results for Summa canister analysis

Client F	Reference	21-51	21-52		
Sample	Туре	Silco Canister #1746	Silco Canister #1726		
Samplin	ng Time / Date			n/a 22/01/2021	n/a 28/01/2021
Sample	Description			ambient air	ambient air
Method	Volatile Organic Compounds (VOCs) by GCMS	Units	Reporting Limit	21KS169	21KS170
28237	Benzene	ppbv	0.5	< LOR	< LOR
28237	Toluene	ppbv	0.5	0.6	< LOR
28237	Ethylbenzene	ppbv	0.5	0.7	< LOR
28237	m- & p-Xylene	ppbv	0.5	3.3	< LOR
28237	o-Xylene	ppbv	0.5	0.5	< LOR

Temperature and atmospheric pressure at time of sampling unavailable

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SSP73217

APPENDIX C

Important Information Relating to this Report



The document ("Report") to which this page is attached and which this page forms a part of, has been issued by Golder Associates Pty Ltd ("Golder") subject to the important limitations and other qualifications set out below.

This Report constitutes or is part of services ("Services") provided by Golder to its client ("Client") under and subject to a contract between Golder and its Client ("Contract"). The contents of this page are not intended to and do not alter Golder's obligations (including any limits on those obligations) to its Client under the Contract.

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