Appendix B5
Construction Air Quality Management Plan

Project: Keepit Dam Work Package 2 - Post Tensioning Works
Location: Keepit Dam, Namoi River, Northern NSW
Client: WaterNSW
Contract: 04532F31

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Construction Air Quality Management Plan

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REVIEWED: _____ Date: 22 - 2 - 19

(for acceptance) Louise Pitt

QSE Advisor

ACCEPTED:  Date: 26 - 2 - 19

(for release) Sam Pearce

Project Manager

Revision history

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1	10/02/17	Issued to stakeholders and DPE for review	A McFarlane
2	02/04/17	Updated to address DPE comments	A McFarlane
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4	14/11/18	Reviewed Nil Changes	A McFarlane
5	22/02/19	Project Manager details updated	Sam Pearce

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Contents

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Abbreviations

Term	Definition
AQIA	Air Quality Impact Assessment
AQMP	Construction Air Quality Management Plan
CEMP	Construction Environmental Management Plan
CoA	Conditions of Approval
CTP	Compliance Tracking Program
DPE	Department of Planning and Environment
EA	Environmental Assessment
EMR	Environmental Management Representative
EMS	Environmental Management System
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000*
EPA	Environment Protection Authority
NSW	New South Wales
Project, the	Keepit Dam Work Package 2 – Post Tensioning Works
SoC	Statement of Commitments
SRG	SRG Limited
WaterNSW	The client

Construction Air Quality Management Plan

1. Introduction

1.1. Context

This Construction Air Quality Management Plan (AQMP or Plan) is a Sub plan of the Construction Environmental Management Plan (CEMP) for the Keepit Dam Stage 2, Work Package 2 – Post Tensioning Works project (Keepit Dam Post Tensioning Works) (the Project).

This AQMP has been prepared to address the requirements of the *Keepit Dam Upgrade Environmental Assessment* (PB, 2007), the *Keepit Dam Upgrade Submissions Report and Preferred Project Report* (PB, 2008), the resulting Project Approval (06_0155) issued for upgrade of Keepit Dam, and all applicable legislation.

1.2. Background

Keepit Dam is situated on the Namoi River, 13 km upstream of its confluence with the Peel River in the north-west of NSW.

The NSW Dams Safety Committee requires that Keepit Dam be upgraded to be able to safely pass the probable maximum flood and to withstand earthquake events. WaterNSW is therefore undertaking dam safety upgrade works to Keepit Dam to comply with the requirements of the NSW Dams Safety Committee.

WaterNSW has adopted a two stage approach to upgrading Keepit Dam:

- Stage 1 - Construction of two fuse plug spillways – completed in 2011.
- Stage 2 - Electrical relocation, post tensioning of the main dam wall and raising of the dam concrete monoliths and the main embankment.

The Stage 2 works have been procured into three separate contract work packages, these being:

1. Electrical relocation works – completed in 2015.
2. Post tensioning the main dam wall.
3. Raising of the dam concrete monoliths and main embankment.

This Construction Air Quality Management Plan (AQMP) has been prepared for the Stage 2, Work Package 2; Keepit Dam Post Tensioning Works.

1.3. Environmental Management System Overview

The overall Environmental Management System for the Project is described in the Construction Environmental Management Plan (CEMP).

The AQMP is part of the SRG Limited (SRG) environmental management framework for the Project, as described in Section 4.1 of the CEMP. Management measures identified in this Plan will be incorporated into site or activity specific Environmental Work Method Statements (EWMSs) or Work Method Statements (WMSs) where relevant.

EWMSs / WMSs will be developed and signed off by environment and management representatives prior to associated works, and construction personnel will be required to undertake works in accordance with the identified mitigation and management measures.

Used together, the CEMP, strategies, procedures and EWMSs form management guides that clearly identify required environmental management actions for reference by SRG personnel and contractors.

The review and document control processes for this Plan are described in Section 9 of the CEMP.

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2. Purpose and objectives

2.1. Purpose

This Construction Air Quality Management Plan describes how SRG propose to manage and protect air quality impacts during construction of the Keepit Dam Stage 2, Work Package 2 – Post Tensioning Works.

2.2. Objectives

The key objective of the AQMP is to ensure that impacts to air quality are minimised. To achieve this objective, SRG will undertake the following:

- Ensure appropriate controls and procedures are implemented during construction activities to avoid or minimise air quality impacts and potential adverse impacts to sensitive receivers.
- Ensure appropriate measures are implemented to address the relevant requirements of the Conditions of Approval outlined in Table 3.1 and Statement of Commitments in Table 3-2.
- Ensure appropriate measures are implemented to comply with all relevant legislation, relevant guidelines and other requirements as described in Section 3.1 of this Plan.
- Maintain the amenity for surrounding residents.
- Inform the community of construction works to ensure they are informed of potential impacts.
- Maintain an effective response mechanism to deal with issues and complaints.

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3. Environmental Requirements

3.1. Relevant legislation and guidelines

3.1.1. Legislation

Legislation relevant to air quality includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act).
- *Protection of the Environment Operations Act 1997* (POEO Act).
- *Protection of the Environment Operations (Clean Air) Regulation 2010* (NSW).
- *Protection of the Environment (Air Toxics) Regulation 1998* (NSW) (as amended).
- *Protection of the Environment (General) Regulation 2009* (NSW).
- *Protection of the Environment (Ambient Air Quality) Regulation 1998* (NSW) (as amended).
- *National Greenhouse and Energy Reporting Act 2007* (Cth).
- *National Environmental Protection Measure Act 1994* (Cth).

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in the CEMP.

3.1.2. Guidelines and Standards

The main guidelines, specifications and policy documents relevant to this Plan include:

- National Environment Protection Council's (NEPC) – *NEPM for Ambient Air Quality Guidelines.*
- *Action for Air 1998* (NSW DEC).
- *Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW* (DEC 2005).
- *Managing particles and improving air quality in NSW* (EPA 2013).

3.2. Conditions of Approval

The requirements of the Project Approval relevant to air quality are detailed in Table 3-1.

Table 3-1 Conditions relevant to the Air Quality Management Plan

CoA No.	Condition	Where addressed
2.9	The Proponent shall construct the project in a manner that minimises dust emissions from the site, including wind-blown and traffic-generated dust. All activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, the Proponent shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.	Table 6-1
6.2	The Proponent shall prepare and implement a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during construction of the project. The CEMP shall be consistent with	

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CoA No.	Condition	Where addressed
	Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and shall include, but not necessarily be limited to: a) a description of all relevant activities to be undertaken on the site during construction and confirm the use of either earthen release plugs only or earthen release plugs and release gates for the project and the conditions under which they will operate; b) statutory and other obligations that the Proponent is required to fulfil during construction including all relevant approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies; c) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified potential adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: I. measures to monitor and manage dust emissions; II. measures to monitor and minimise soil erosion and the discharge of sediment and other pollutants to lands and/ or waters during construction activities; III. measures to monitor and control noise emissions during construction works; IV. measures to monitor and control air emissions during construction to ensure that air emissions are both minimised and in compliance with the requirements of this approval and the Environment Protection Licence for the site; V. measures to minimise the impact of construction on local flora and fauna, consistent with the mitigation measures described in section 5.1.3 of the document referred to under condition 1 .1b); d) a description of the roles and responsibilities for the ER and all relevant employees involved in the construction of the project; e) the additional Plans listed under condition 6.3 of this approval; and f) complaints handling procedures during construction. The CEMP shall be submitted for the approval of the Director-General no later than one month prior to the commencement of any construction works associated with the project, or within such period otherwise agreed by the Director-General. Construction works shall not commence until written approval has been received from the Director-General.	Subsection c) I. of CoA 6.2 is addressed through Section 7.3 and Table 6-1. Subsection c) IV. of CoA 6.2 is addressed through Section 7.3 and Table 6-1.

This AQMP has been prepared to address Condition of Approval 6.2 and 2.9. Condition of Approval 3.2 requires an Air Quality Monitoring Program to be developed. The *Air Quality Impact Assessment* undertaken as part of the Submissions Report, recommended management measures only in relation to Stage 1 works (as Stage 2 was not expected to result in substantial changes to air quality), and as a result monitoring was only recommended for Stage 1 works.

As Stage 2 works are not expected to result in substantial changes to air quality, air quality monitoring will involve visual monitoring through weekly inspections. This is detailed within Section 7.3 of this Plan. Weekly inspections will be undertaken with the inspection form provided in Appendix D of the CEMP completed.

3.3. Statement of Commitments

Statement of Commitments from the Submissions and Preferred Project Report relevant to air quality are detailed in Table 3-2.

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Table 3-2 Statement of Commitments relevant to air quality

SoC No.	Condition	Where addressed
35.1	A Dust Management Sub Plan will be prepared as part of the CEMP. The Sub Plan will identify:	This Plan
	a) potential sources of dust;	Section 5, CEMP
	b) dust management objectives consistent with DECC guidelines;	Appendix C
	c) a monitoring program to assess compliance with the identified objectives. Monitoring for dust deposition and particulate concentration will be undertaken according to the DECC Guideline "Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales";	Section 2.2 Section 7.3
	d) disturbed areas would be stabilised immediately to prevent or minimise wind-blown dust;	Table 6-1
	e) mitigation measures to be implemented, including measures during weather conditions where high level dust episodes are probable (such as strong winds in dry weather);	Table 6-1
	f) a progressive rehabilitation strategy for exposed surfaces with the aim of minimising exposed surfaces;	Table 6-1
	g) nearest potentially affected receptors would be notified prior to blast events;	N/A
	h) PM10 24-hour concentration would be monitored during each blast event, the extent and frequency of which will be outlined;	N/A
	i) rumble grids and/or wheel wash facilities at the site exit onto sealed roads to remove mud and dust from vehicles. Alternatively, roads would be swept to remove dirt and mud; and	Table 6-1
	j) pre-construction baseline levels measured to establish the existing ambient air profiles and evaluate the effectiveness of the site-specific ameliorative measures.	Section 7.3
35.2	Construction vehicles using public roads will be maintained to prevent any loss of load, whether dust, liquid or soils. Facilities will be provided at exit points of all Construction sites/compounds to minimise tracking mud, dirt or other material onto a public road or footpath. In the event of any spillage, the spilled material will be removed as soon as practicable within the same working day as the spillage.	Table 6-1
35.3	All plant and equipment used in connection with the Activity will be: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Table 6-1

All Statement of Commitments detailed within the Submissions Report are considered applicable to Stage 2, Package 2 works and have been included in Table 3-2 above.

3.4. Other requirements of the Submissions Report

The Submissions Report included an *Air Quality Impact Assessment* in Appendix C1.

Section 8.2 of the Air Quality Impact Assessment (AQIA) includes a set of mitigation measures. Measures relevant to Stage 2, Package 2 project works have been detailed in Table 3-3 and Table 6-1.

Table 3-3 Measures from the Air Quality Impact Assessment

Section	Measure	Where addressed
8.2	• Disturbed areas would be stabilised immediately to prevent or minimise wind-blown dust.	Table 6-1 AQ5

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Section	Measure	Where addressed
	• Vehicles transporting spoil and materials with the potential to generate dust to and from the site would be covered immediately after loading to prevent wind blown dust emissions and spillages; tailgates of road transport trucks would be securely fixed prior to loading and immediately after unloading.	Table 6-1 AQ11
	• Construction plant and equipment would be well maintained and regularly serviced so that vehicular emissions remain within relevant air quality guidelines and standards.	Table 6-1 AQ10
	• All site vehicles and machinery would be switched off or throttled down to a minimum when not in use.	Table 6-1 AQ12
	• Excess or unnecessary revving of engines should not be permitted.	Table 6-1 AQ12
	• All chemicals and fuels should be stored in sealed containers or sealed buildings.	Table 6-1 AQ13

The *Air Quality Impact Assessment* undertaken as part of the Submissions Report, recommended management measures only in relation to Stage 1 works (as Stage 2 was not expected to result in substantial changes to air quality). Nevertheless, any measures relevant to Stage 2, Package 2 works have been included in Table 3-3 above.

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4. Existing Environment

An *Air Quality Impact Assessment* was undertaken as part preparation of the Submissions and Preferred Project Report in 2008.

The *Air Quality Impact Assessment* found that Stage 2 works would primarily involve construction activities associated with raising the main dam wall which are not expected to result in substantial changes in ambient air quality. Modelling was therefore undertaken on two scenarios associated with the Stage 1 works only.

Five sensitive receivers were identified in the area and include:

Table 4-1 Sensitive receivers

No	Property name	Location	Approximate distance (m)
1	1521 Bulga Road	West of main dam	750
2	Illawong	South-west of main dam	1250
3	Mostyn Vale	South of main dam	2500
4	Residential Property A	South-east of main dam	4000
5	Sorrento	East of main dam	4700

Commercial receivers identified in the EA to be located in the vicinity of the Project include:

Table 4-2 Commercial receivers

No	Property name	Location	Approximate distance (m)
1a	The Gums Caravan Park (now Inland Waters Caravan Park)	South of main dam	1000
2a	Lakeside Caravan Park (now Lake Keepit State Park)	South of main dam	1000
3a	Lake Keepit Sport and Recreation Centre	North-east of main dam	3500
4a	Sailing club	South-east of main dam	1200
5a	Kiosk (now Lake View Café, located at Lake Keepit State Park)	South of main dam	1000
6a	Gliding club hangar	South-east of main dam	3000

The location of these sensitive receivers is identified in Figure 4-1.

Based on a review of existing land uses in the vicinity of the Project area, the existing air quality area is considered to be characteristic of a rural environment with key air emission sources expected to include a combination of general rural/residential activities and the use of local roads. No known major pollutant generating facilities are located in the immediate vicinity of Keepit Dam. Particulate matter, carbon monoxide (CO), hydrocarbons and the oxides of nitrogen (NO_x) and sulphur (SO_x) are all expected to fall within acceptable ranges.

Ambient air quality data is not currently available for the Project site and no site-specific monitoring was undertaken. Measured PM10 profiles (2001) from the DECC controlled Tamworth air quality monitoring site were adopted to provide a conservative estimate of background conditions. This station is located approximately 40 kilometres north-east of Keepit Dam, in a rural/urban area. This approach was considered the best available for this assessment and is consistent with the NSW policy document.

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An annual average PM10 background concentration level of 13.5 µg/m3 was calculated from the 2001 Tamworth data. This background value was adopted and added to the calculated incremental impacts, where available.

As can be seen from Figure 4-1 and Table 4-1 and Table 4-2, the closest sensitive receiver is 750 metres away. All other receivers are 1 kilometre or more away from the project site. Due to the location of the sensitive receivers and minimal potential to create dust and air quality impacts for Stage 2 works, the *Air Quality Impact Assessment* recommended that the management measures within the Assessment only apply to Stage 1 works. Nevertheless, SRG has reviewed these management measures, and where applicable to project works, have included these in Table 6-1.

Management measures were recommended within the *Air Quality Impact Assessment*, however only in relation to Stage 1 works (as Stage 2 was not expected to result in substantial changes to air quality).

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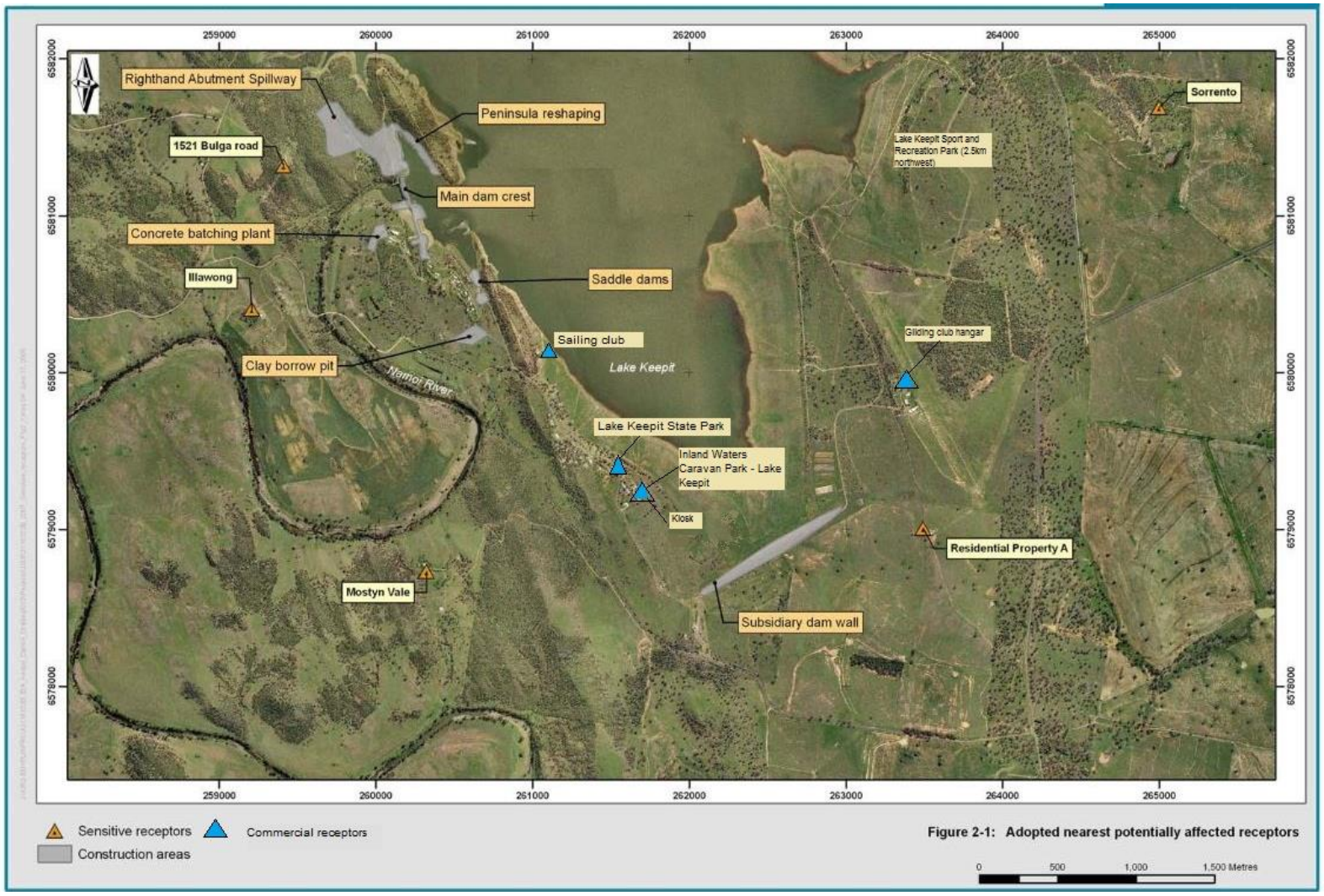

Figure 4-1 Sensitive and commercial receivers

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4.1. Rainfall, Soil Dryness, Wind

The rainfall records from Keepit Dam (Table 4-3) reflect the potential rainfall conditions across the Project site.

Table 4-3 – Weather observations from Keepit Dam for 1955-2016 (BoM).

Mean	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Rainfall (mm)	84.7	64.3	42.4	35.8	42.9	36.9	38.9	35.1	39.3	52.5	66.1	74.5	613.2

There was no data available for Keepit Dam for temperature records, therefore the weather station at Gunnedah was used.

Table 4-4 – Weather observations from Gunnedah.

Mean	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Mean Max (^{0}C)	31.9	31.1	29.1	25.2	20.4	16.9	16.1	17.9	21.5	25.2	28.4	31	24.6
Mean Min (^{0}C)	18.8	18.7	16.6	12.8	8.7	6.1	4.8	5.9	8.6	12.2	15.1	17.4	12.1

The above tables provides a consideration of typical climatic factors that contribute to the proliferation of dust particulates. In addition to the exposure of unconsolidated material during construction, climatic factors such as high winds, high temperatures and low rainfall can increase the likelihood of dust particulate emissions.

It is evident that rainfall is typically higher between October and February.

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5. Aspects and Impacts

5.1. Construction Activities

Emissions to the atmosphere during construction that could result in adverse impacts to air quality are typically divided into two categories:

- Dust and particulates.
- Gases.

Key aspects of the Project that could result in dust emissions include:

- Demolition of the concrete monoliths.
- Drilling and coring process.
- Grouting.
- Vehicular movements over unpaved surface (including unsealed access roads).
- Wind erosion of exposed areas.
- Tracking of dirt onto roads.

Air emissions, other than dust, which may be generated by construction activities include vehicle and plant exhaust emissions, which may be excessive if vehicles and plant are poorly maintained.

5.2. Factors Likely to Affect Dust Generation and Impacts

In addition to the inherent risks of specific construction activities creating the potential to generate dust, a number of other environment factors also affect the likelihood of dust emissions. These include:

- Wind direction – determines whether suspended particles are transported towards sensitive receivers.
- Wind speed – governs the potential suspension and drift resistance of particles.
- Soil type - more erodible soil types have an increased soil or dust erosion potential.
- Soil moisture – increased soil moisture reduces soil or dust erosion potential.
- Rainfall or dew – rainfall or heavy dew that wets the soil surface and reduces the risk of dust generation.

5.3. Impacts

Potential impacts attributable to construction might include:

- Deposition of dust on surfaces due to the drilling or grouting process.
- Aesthetic effects that arise from visible airborne dust plumes.
- Potential adverse health effects including eye, nose and throat irritation from excessive inhalation of fine particles.
- Impacts on water quality, vegetation and livestock health from dust deposition.
- Impacts on residential sensitive receivers.
- Complaints from the public relating to dust or odours.

Environmental mitigation measures are detailed in Section 6 to manage potential impacts.

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6. Environmental Mitigation Measures

A range of environmental requirements and control measures are identified in the various environmental documents, including the EA, Submissions and Preferred Project Report and Project Approval. Specific measures and requirements to address potential air quality impacts are outlined in Table 6-1.

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Table 6-1 Environmental management measures

ID	Environmental Management Measure	When to implement	Responsibility	Reference
AQ1	Training will be provided to all personnel (including subcontractors), on any relevant air quality requirements from this plan through inductions and toolboxes.	Pre-construction and construction	Site SQE Representative	CoA 6.3(c)(i)
AQ2	Where relevant air quality control measures from this plan will be included in Environmental Work Method Statements (EWMS).	Construction	Site SQE Representative	CoA 6.3(c)(i)
AQ3	All activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, SRG shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.	Construction	Project Manager, Site SQE Representative, Superintendent	SoC 35.1
AQ4	Drilling and coring operations will involve the application of water which will assist in minimising potential dust impacts.	Construction	Superintendent	Good practice
AQ5	Areas of disturbed material (ie fabrication and storage beds and carpark) will be stabilised by gravel, and / or roadbase material to assist in reducing potential dust impacts.	Construction	Superintendent	Good practice
AQ6	Should any disturbed areas occur through Project activities, disturbed areas would be stabilised where possible by methods such as compaction, spraying via water carts or hand held hoses etc.	Construction	Superintendent	SoC 35.1
AQ7	During weather conditions where high level dust episodes are probable (such as strong winds in dry weather), activities will be reviewed and visually monitored to ensure dust impacts are minimised. Where visible emissions of dust from the site occur, activities and mitigation measures will be reviewed.	Construction	Project Manager, Site SQE Representative, Superintendent	SoC 35.1
AQ8	Construction vehicles using public roads will be maintained to prevent any loss of load, whether dust, liquid or soils. Where required, facilities will be provided at exit points of all construction sites/compounds to minimise tracking mud, dirt or other material onto a public road or footpath. In the event of any spillage, the spilled material will be removed as soon as practicable within the same working day as the spillage.	Construction	Site SQE Representative, Superintendent	SoC 35.1 SoC 35.2
AQ9	There will be no burning off of waste.	Construction	Site SQE Representative, Superintendent	CoA 6.3(c)(i)

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ID	Environmental Management Measure	When to implement	Responsibility	Reference
AQ10	Exhaust systems of construction plant, vehicles and machinery will be maintained in accordance with manufacturer's specifications to ensure that emissions do not exceed EPA regulations.	Pre-construction and construction	SRG Superintendent / WaterNSW	SoC 35.1
AQ11	Vehicles transporting any material with the potential to generate dust would be covered after loading. Tailgates would also be securely fixed.	Construction	Site SQE Representative, Superintendent	AQIA
AQ12	Site vehicles and machinery will be turned off or throttled down when not in use. Excessive unnecessary revving of engines shall not occur.	Construction	Superintendent	AQIA
AQ13	Chemicals and fuels will be stored in sealed containers.	Construction	Site SQE Representative, Superintendent	AQIA
AQ14	Weather forecast will be reviewed on a daily basis and appropriate measures implemented where unfavourable weather conditions (dry weather, strong winds) are anticipated.	Construction	Site SQE Representative, Superintendent	CoA 6.3(c)(i)

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7. Compliance Management

7.1. Roles and Responsibilities

The organisational structure and overall roles and responsibilities are outlined in the CEMP. Specific responsibilities for the implementation of environmental controls are detailed in Section 4 of this Plan.

7.2. Training

All employees and contractors working on site will undergo site induction training relating to air quality management issues. The induction training will address elements related to air quality management including:

- Existence and requirements of this sub-plan.
- Relevant legislation.
- Air quality mitigation and management measures.
- Procedure to be implemented in the event of an incident (eg release of dust or gaseous emissions from site).

Further details regarding staff induction and training are outlined in Section 5 of the CEMP.

7.3. Monitoring and Inspections

Management measures were recommended within the Air Quality Impact Assessment, however only in relation to Stage 1 works (as Stage 2 was not expected to result in substantial changes to air quality).

Monitoring of dust levels to assess impacts of Stage 1 works was recommended in the Air Quality Impact Assessment to assist with assessing the impact of construction works. There was no recommendation for this for Stage 2 works.

As Stage 2 works are not expected to result in substantial changes to air quality, air quality monitoring will involve visual monitoring through weekly inspections.

Weekly inspections will be undertaken with the inspection form provided in Appendix D of the CEMP completed.

7.4. Non-conformances

Non-conformances will be managed in accordance with Section 8.5 of the CEMP.

7.5. Audits

Audit requirements are detailed in Section 8 of the CEMP.

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8. Review and Improvement of the AQMP

8.1. Continuous improvement

Continuous improvement of this Plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Make comparisons with objectives and targets.

8.2. AQMP update and amendment

The processes described in Section 8 of the CEMP may result in the need to update or revise this Plan. This will occur as needed.

Only the Environmental Site Representative, or delegate, has the authority to change any of the environmental management documentation. In terms of approval of updates or amendments to this Plan, this is to be carried out by the Environmental Management Representative (EMR), with the EMR verifying that the amendments are consistent (or not) with the Project Approval.

A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure – refer to Section 9 of the CEMP.