

From: [Rachel Ritchie](#)
To: [Scott Lucke](#)
Cc: [Scott Barnes](#); [Jason Brooks](#); [Cathee Miller](#); [Patrice Brown](#)
Subject: Project Halogen - initial referral agency feedback from TMR
Date: Wednesday, 3 September 2025 3:07:29 PM
Attachments: [image003.png](#)

Hi Scott

As mentioned in the pre-lodgement meeting today, I have circulated the slide deck to the Department of Transport and Main Roads (TMR) for initial review and comment. Below is a summary of their key comments and recommendations. I note that some of the matters they raised you had indicated were underway at our pre-lodgement meeting this morning.

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Approvals:

- According to the layout plan the site is obtaining access off the local road Landing Road. Landing Road intersects with the state-controlled road. Provided no direct access to the state-controlled road is being sought, the applicant will not be required to obtain approval from TMR under s 62 of the *Transport Infrastructure Act 1994* for a permitted access location.

General interests:

- TMR's interest in this application is understanding the potential traffic impacts associated with both the construction and operational phases of this project on the broader state-controlled road network.
- From the information available it is not clear whether traffic impacts will be generally limited to construction, or whether large amounts of haulage vehicles / staff movements and so on will be required as part of the ongoing project.
- The Landing Road / Gladstone – Mount Larcom Road intersection appears to be currently configured with channelised turning lanes for left and right turning movements these appear to be full length.
- It is recommended that the applicant be required to submit a Traffic Impact Assessment as part of the application to outline the transport impacts associated with the proposal. This will provide the information necessary for the department to understand whether this project and the traffic movements associated with it will result in any impacts to the transport network that may require mitigation.
- Absent any understanding of the traffic movements associated with this proposal, the department's advice is limited to requesting a Traffic Impact Assessment whilst being clear that the level of assessment required will be defined by the nature of the use and which triggers under Table 6.4 of the GTIA are exceeded. It may be the case that the assessment merely needs to show that none of those thresholds are met; in such a case that is the limit of the

assessment

Recommendation:

General – Traffic Impact Assessment

- The information available indicates the use is a chemical plant which is intended to produce up to 160,000 tonnes per year of material. Beyond this figure there does not appear to be any information to understand the broader transport impacts on state-controlled roads.
- At this stage the department's advice is to undertake a Traffic Impact Assessment in accordance with the TMR Guide to Traffic Impact Assessment. The extent of this assessment will depend on the nature of the use, how it operates, the number of staff movements and how material is to be transported from the site. The assessment should analyse both the construction and operational phases of the project.
- The assessment should examine the impact assessment area classes and the impact assessment years to determine if further assessment is required. For example some impact assessment area types may not be relevant, or may not meet the necessary thresholds for further assessment. As an example, it is not clear if the material from this site is being piped for export elsewhere or is intended to be hauled on trucks. In the latter case the assessment should consider whether this transport is likely to trigger any pavement impacts. Where any of the impact assessment areas are triggered the Traffic Impact Assessment must undertake the further assessments required as defined by the correlating chapters in the GTIA.

Please let me know if you have any queries or once you undertake a detailed traffic assessment, I would be happy to arrange a pre-lodgement meeting with TMR if that would assist or send through draft material to TMR for further review.

Kind Regards

Rachel

Rachel Ritchie

Senior Planner, Planning and Services

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Scott Lucke

From: Rachel Ritchie <Rachel.Ritchie@coordinatorgeneral.qld.gov.au>
Sent: Wednesday, 1 October 2025 11:28 AM
To: Scott Lucke
Subject: Followup from Grenof/CQG/DETSI/OIR/OCG meeting

Hi Scott

Below are the key discussion points from referral agencies that were discussed at the Grenof/CQG/DETSI/OIR/OCG meeting on 3rd September 2025 following the presentation of the project from Grenof and CQG. I have also included an update on responses from other agencies that I have received since our meeting. Please let me know if you would like to discuss any of this feedback further.

Key feedback provided at meeting	Actions/update
<p>DETSI Feedback</p> <ul style="list-style-type: none">- Any Federal Matters? Are these likely going to be resolved prior to the lodgement of an application? Significant Impact?- Raw Water coming from GAWB – Third party waste disposal and transportation off-site- Limited number of places which will accept saline material – may be a fair distance away from site- Grenof in discussion with GAWB – may have interest in use of saline waste material- Salt material inputs – does it need to be clean material? Or contaminants which need to be considered?- Grenof - Salt specification is important – likely to come from 45 minutes away, which does supply to another facility in Brisbane- Application should address measures in place which minimise emissions for DETSI's review- Grenof – designed for a catastrophic release so it would be 0 release into the environment	<ul style="list-style-type: none">• CQG has provided air quality impact information to DETSI – initial response provided and detailed response from air quality team to come
<p>OIR Feedback</p> <ul style="list-style-type: none">- If systems fail and chlorine seeps, may exceed PO1-PO5 and as such a response to Purpose Statement of State Code 21 may be required.- Location within GSDA which is intended to accommodate such types of facilities is appropriate as justification for Purpose	

<p>Statement of State Code 21 and identify mitigation measures should release exceed thresholds in PO1 and PO5</p> <ul style="list-style-type: none"> - Should not be a major issue if can demonstrate purpose statement - Bushfire Risk – demonstrate how this has been considered in terms of MHF 	
<p>OCG Feedback</p> <ul style="list-style-type: none"> - OCG will separately contact additional referral agencies and will arrange separate briefings if required - Material has been provided to GRC but they have limited availability for a meeting at this stage 	<p>OCG to provide material to referral agencies</p> <ul style="list-style-type: none"> • Initial advice from TMR emailed to CQG/Grenof on 03/09/2025 • Initial advice from DPI is that no specific concerns, but will assess in detail in referral stage • Initial advice from NRMRRD: <ul style="list-style-type: none"> ○ Recommend proponent contacts Queensland Energy Resources Pty Ltd regarding Mining Lease (MLA 80081) and associated Mineral Development Licence (MDL) for Oil Shale granted under the Mineral Resources Act 1989, to discuss progression of the application and implications for development. ○ Clearing vegetation in a category C area on freehold land is not for a relevant purpose under the Vegetation Management Act 1999. Accordingly clearing of vegetation in these areas cannot be applied for under a development approval. Clearing vegetation in these areas must only occur as exempt clearing work or accepted development in accordance with an Accepted Development Vegetation Clearing Code (ADVCC). Clearing vegetation in category C areas that is not exempt or in accordance with an ADVCC is prohibited development. If using the infrastructure Accepted Development Vegetation Clearing Code (ADVCC), note that exchange areas will be required if the areas: <ul style="list-style-type: none"> ▪ exceeds the width limits of the code; or ▪ exceeds the area limits of the code; or

- occurs within 10 metres of the defining bank of a wetland; or
- occurs within 10 metres of a watercourse or drainage feature unless a crossing is required

Thanks
Rachel

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From: Ahmad Rahman <Ahmad.Rahman@detsi.qld.gov.au>
Sent: Monday, October 13, 2025 5:07 PM
To: Scott Lucke <scott.lucke@cqgroup.com.au>; Rachel Ritchie <Rachel.Ritchie@coordinatorgeneral.qld.gov.au>
Cc: Adam Burt <Adam.Burt@detsi.qld.gov.au>; Sally Chapman <Sally.Chapman@coordinatorgeneral.qld.gov.au>
Subject: RE: Grenof chlor-alkali facility - SDA application in the Gladstone SDA - air quality assessment

OFFICIAL

Hi Scott

I've received feedback from our technical support group regarding the use of the SCREEN3 model, and their recommendations for the modelling approach for the proposed activity, as follows:

- The SCREEN3 model, a screening version of the ISCST3 model, is now considered obsolete by the US EPA. ISCST3 has been replaced by AERMOD, and SCREEN3 has been replaced by AERSCREEN, which is the EPA's recommended screening model. AERSCREEN is based on the more advanced AERMOD model. According to the US Code of Federal Regulations (Appendix W of 40 CFR Part 51– Guideline on Air Quality Models), regulatory air quality modelling must adhere to current guidance, requiring AERMOD for full-scale dispersion modelling and AERSCREEN for screening-level modelling.
 - Based on the information provided, the emissions of air pollutants for the facility are very low and the project site has a significant buffer to sensitive receptor locations. However, as previously noted, the SCREEN3 model, which has been replaced by AERSCREEN, must not be used for modelling licensed facilities. It is recommended that the US EPA's AERSCREEN model be utilised for the screening-level assessment of this facility.
 - AERSCREEN, introduced in 2011, is the US EPA's recommended screening model for single sources in both simple and complex terrain. It can be used for point sources, area sources, volume sources, horizontal stacks, capped stacks, and flares. AERSCREEN operates AERMOD in screening mode and comprises two key components:
 1. The MAKEMET program, which creates a site-specific matrix of meteorological conditions for input into the AERMOD model.
 2. The AERSCREEN command-prompt interface.
 - The report must explain how the worst-case 'synthetic' meteorological data is generated for dispersion modelling under the worst-case scenario. Guidance from the US EPA User Guide for AERSCREEN, which outlines the process for generating this "synthetic" meteorological data, must be followed:
https://gaftp.epa.gov/aqmg/SCRAM/models/screening/aerscreen/aerscreen_userguide.pdf
- Please let me know if you would like to meet with us to discuss it further.

Kind regards

Ahmad Rahman

Senior Environmental Officer

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From: Scott Lucke <scott.lucke@cqgroup.com.au>

Sent: Friday, 19 September 2025 9:10 AM

To: Ahmad Rahman; Rachel Ritchie

Cc: Adam Burt; Sally Chapman

Subject: RE: Grenof chlor-alkali facility - SDA application in the Gladstone SDA - air quality assessment

Hi Ahmad / Rachel,

Thanks for the initial feedback Ahmad. Noting the time pressures in the project schedule, Katestone will continue with modelling in parallel with DETSI technical review process while awaiting a response.

Regards,

Scott Lucke

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From: Ahmad Rahman <Ahmad.Rahman@detsi.qld.gov.au>

Sent: Thursday, September 18, 2025 4:12 PM

To: Rachel Ritchie <Rachel.Ritchie@coordinatorgeneral.qld.gov.au>

Cc: Adam Burt <Adam.Burt@detsi.qld.gov.au>; Sally Chapman <Sally.Chapman@coordinatorgeneral.qld.gov.au>; Scott Lucke <scott.lucke@cggroup.com.au>
Subject: RE: Grenof chlor-alkali facility - SDA application in the Gladstone SDA - air quality assessment

OFFICIAL

Hi Rachel

I've had a quick look at the proposed approach for the air quality assessment.

However, I haven't yet had the opportunity to get the proposal reviewed by our technical experts. As a general guide, the Tech Team typically can require around four weeks to provide advice on such requests due to competing timeframes and workload.

Prior to providing a detailed technical review, in the short time we have had the report, there were a few initial points we'd like to highlight for your consideration.

Firstly, as Scott mentioned in his email, the SCREEN3 dispersion model is primarily designed for preliminary assessments and provides a broad, high-level overview of air quality impacts. While it is a useful screening tool for identifying potential areas of concern, it has significant limitations in terms of precision and detail. SCREEN3 does not account for complex meteorological conditions, terrain variations, or building downwash effects, which are often critical factors in accurately predicting air quality impacts in real-world scenarios.

Given the limitations of SCREEN3, it is proposed to utilise dispersion models. These models are better suited for detailed assessments provided they incorporate the appropriate site-specific meteorological data, terrain features, and other complex variables. CALPUFF, in particular, is widely recognised for its ability to model long-range transport and near-field impacts in complex environments. Using such model would provide a more robust and defensible analysis for the purposes of this assessment.

Secondly, since there are no specific air quality objectives for the relevant contaminants in Queensland, we are not opposed to the use of the NSW standards as a benchmark. However, we would appreciate a commentary on whether air quality standards from other jurisdictions, such as Victoria or international benchmarks, were also considered during the development of the proposal. This would help ensure that the most appropriate and stringent standards are applied.

Additionally, we recommend that the predicted ground-level concentrations at distances of less than 100 metres from the source be included in the assessment. This is particularly important as there are likely to be sensitive receptors, such as commercial and office buildings, located within close proximity to the emission source. Understanding the potential impacts at these shorter distances is critical for evaluating

the overall risk to nearby receptors.

Please contact me if you have any questions.

Kind regards

Ahmad Rahman

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From: Rachel Ritchie <Rachel.Ritchie@coordinatorgeneral.qld.gov.au>

Sent: Thursday, 18 September 2025 12:42 PM

To: Ahmad Rahman

Cc: Adam Burt; Sally Chapman; Scott Lucke

Subject: Grenof chlor-alkali facility - SDA application in the Gladstone SDA - air quality assessment

Hi Ahmad

As per my earlier emails, could you please provide any DETSI feedback on the initial air quality impact assessment for the Grenof chlor-alkali facility via email to Grenof's planning consultant, Scott Lucke, who is copied into this email.

I am on leave after today and will be back in the office on Monday 29th September, but would appreciate if you could provide any feedback to Scott directly in my absence and copy me into the responses. If needed, we can arrange a meeting after 29th September to discuss any additional aspects relating to air quality.

The air quality impact assessment is attached again for your reference.

Kind Regards

Rachel

Rachel Ritchie

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