



DOC21/1026368-2

Ms Rose-Anne Hawkeswood
Team Leader - Energy Resource Assessment
Planning and Assessment Division
Department of Planning, Industry and Environment

Via: Major Projects Planning Portal

7 December 2021

Dear Ms Hawkeswood

**SUNRISE PROJECT - DA374-11-00-Mod-7
Additional EPA Advice on Submissions Report**

Thank you for the request for advice from Public Authority Consultation (PAE-31920068), requesting a review by the NSW Environment Protection Authority (EPA) of the additional information to the Response to Submissions Report prepared for Sunrise Project DA374-11-00-Mod-7 (Mod 7).

The EPA has reviewed the letter and two attachments provided by the proponent and titled *Sunrise Project Modification 7 - Request for Information (EPA Advice on Submissions Report)* prepared by Sunrise Energy Metals Limited and dated 12 November 2021.

Air:

The EPA considers that the additional information provided by the proponent has broadly addressed the EPA's request for further information. However, the assessment of air quality impacts to date has been based on prescribed concentrations contained in the *Protection of the Environment Operation (Clean Air) Regulation* rather than actual plant design specifications or emission guarantees. As such, the EPA is concerned that there is some residual uncertainty with actual emission performance and the potential impacts from the activities proposed under Mod 7.

The EPA recommends that the Department of Planning, Industry and Environment (DPIE) considers the revised and new conditions contained within Attachment 1 should the Mod 7 proposal be approved.

Noise:

The EPA notes that the proponent's consultant, Renzo Tonin & Associates, has provided additional information regarding the appropriateness of the use of noise bunds to mitigate noise at the receivers Currajong Park 1 and 2. The consultant concluded that any noise bunds would be neither reasonable nor feasible to construct and provided further modelling and commentary to support this conclusion.

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The EPA recommends that if approved, DPIE condition any consent to include the requirement for the proponent to update the Noise Management Plan (condition 9, DA374-11-00) to reflect the reasonable and feasible mitigation measures proposed in the Project Execution Plan Modification.

If you have any questions regarding this matter, please contact the EPA's Mr Andrew Helms on 6333 3805 or via e-mail at EPA.Southopsregional@epa.nsw.gov.au.

Yours sincerely

SHERIDAN LEDGER
A/Manager
Regulatory Operations Regional

Attachment 1: Recommended conditions of project approval - Air

Attachment 1 – Recommended Conditions of Approval

Recommended revised condition of approval

Current consent condition:

20. On submission of an application for an Environment Protection Licence, The Applicant must provide a revised air quality impact assessment to ensure the impacts of the proposal are appropriately assessed and demonstrate compliance with the relevant requirements of the Protection of the Environment Operations (Clean Air) Regulation 2010, to the satisfaction of the EPA.

Recommended revised consent condition:

20. Prior to commencement of construction of the processing plant and power generation facilities the applicant must provide an Air Quality Verification Report to the Secretary for approval, in consultation with the EPA (the Verification Report). The Verification Report must:
- a. Include manufactures specifications or emission performance guarantees for each emission discharge point associated with the processing plant and power generation facilities
 - b. Benchmark the design against best practice to demonstrate that emissions are minimised as far as practicable
 - c. Confirm that all emission discharges will comply with the prescribed concentrations contained in the *Protection of the Environment Operations (Clean Air) Regulation 2021*; and
 - d. Include an Air Quality Impact Verification Assessment (the Verification Assessment) based on final design and emission performance of the processing plant and power generation facilities. The Verification Assessment must:
 - i. be conducted in strict accordance with the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW*
 - ii. assess all potential point and fugitive air pollutant emission sources associated with the processing plant and power generation facilities at the premises
 - iii. confirm predicted impacts will comply with the impact assessment criteria contained in the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW*
 - iv. Propose air emission limits and monitoring requirements for all significant air emission points.

Note, the information contained in the Air Quality Verification Report may be used to inform relevant Environment Protection Licence conditions, including but not limited to emission limits and monitoring requirements.

Recommended new condition of approval

The emergency backup diesel generators must not be used for more than 200 hours per calendar year.