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Submitted via Planning Portal

Attention: Jarrod Blane

EPA Submission on Planning Advice Request

Dear Mr Blane

Thank you for the request for advice on Public Authority Consultation (PAE-35233728). The Department of Planning and Environment (DPE) has requested a review by the NSW Environment Protection Authority (EPA) of the Environmental Impact Statement (EIS) and the Proponents Response to Submissions for the proposed Sancrox Quarry Expansion Project (Application SSD-7293) at Sancrox Road, Wauchope, NSW

Please find the EPA's comments and recommendations in the attached submission.

If you have any questions about this request, please contact Emma Coombs on (02) 4908 6831 or via email at info@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Ensbey'.

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ATTACHMENT A:

NSW Environment Protection Authority (EPA) Submission on Response to Submissions Report for proposed Sancrox Quarry Expansion Project (Application SSD-7293) at Sancrox Rd, Wauchope, NSW

Public Authority Consultation (PAE-35233728)
10 February 2022

The EPA has reviewed the following documents:

- *Sancrox Quarry Expansion Project (SSD-7293) – RFI Response to Further EPA Advice*

The EPA has reviewed the documentation above and has the following comments and recommendations:

1. **Matters to be addressed with conditions** a. **Water Quality – sediment basin design**

The EPA notes that the proponent has agreed to the sediment basin design recommended by the EPA. The EPA further notes that the proponent has stated that any excess water collected within the quarrying pit will be directed via the existing quarry void into the existing sediment retention dam and water holding dam network. The EPA will consider this when reviewing the licensing requirements of the premises.

Recommendation: Should the application be determined by way of approval; it is recommended that a requirement for minimum basin design that accounts for the 95th percentile storm event is reflected in the conditions of approval.

Proposed conditions are included at Attachment B.

b. **Air Quality - predicted large project increments and additional exceedances at various receptors**

The EPA recommended that further robust information is required to provide confidence that the additional exceedances can be managed through reactive management measures based on proposed ambient air monitoring. The EPA recommended that the proponent provide additional analysis or revised modelling results accounting for the proposed reactive management measures at specific trigger levels to demonstrate that predicted additional exceedances can be managed.

The EPA had previously noted that additional PM₁₀ (24 hour) exceedances were predicted at receptor R13 (which is proposed to be purchased by the proponent), and nominal receptors R46, R47 and R48 which are locations on the project boundary to represent potential impacts for future industrial receptors. The additional exceedances were predicted for a maximum daily throughput.

The additional information:

- States that PM₁₀ ambient monitoring would be conducted on the northern and eastern boundaries, as well as an on site weather station.
- States that a timestep of 1-hour for PM₁₀ monitoring would be utilised to provide sufficient time for additional mitigation measures to be implemented at the quarry to reduce dust emissions before an exceedance occurs
- State that nominated 1-hour average trigger levels will be reviewed as monitoring data is collected at the site to ensure that the trigger levels remain appropriate for the ongoing monitoring and management of PM₁₀ emissions from the quarry.
- Includes nominal PM₁₀ ambient trigger levels for 1-hour averaging period.

The additional information has not provided additional analysis of the sources that are contributing to the potential exceedances. However, actions included in the additional information include temporarily ceasing of specific activities that may be causing any increase in monitored PM₁₀ concentrations.

On the basis that additional exceedances are predicted at locations that are representative of potential future industrial receptors, the EPA accepts that this issue could be adequately resolved through a condition of approval requiring a Trigger Action Response Plan to be developed and implemented prior to commencement of increased extraction at the quarry.

The Trigger Action Response Plan (TARP) must be regularly reviewed with consideration of the ambient air monitoring data collected and the specific trigger levels that are to be included within the TARP. However, the EPA considers that an additional monitoring location along the southern boundary should also be undertaken to manage potential impacts at future industrial receptors to the south, and existing residential receptors located beyond the southern boundary.

Recommendation: the EPA recommends the issue can be resolved through a condition of consent requiring the development and implementation of an ambient PM₁₀ monitoring network with a Trigger, Action, Response Plan linked to the ambient air monitoring data. An additional monitoring location along the southern boundary should also be implemented.

Proposed conditions are included at Attachment B.

c. Noise Impacts – background noise has not been adequately assessed.

The EPA notes that Hanson is willing to accept the noise limits and conditions recommended by the EPA.

Recommendation: Proposed noise conditions are included again at Attachment B.

2. Matters to be addressed post approval

a. Licence Variation Required

Hanson currently holds Environment Protection Licence (EPL) 5289 for the scheduled activities of extractive activities and crushing, grinding and separating for up to 500,000 tonnes per annum. The proposal proposes significant amendments to the scheduled activities and monitoring currently being undertaken in accordance with EPL 5289.

The EPA notes that Hanson has accepted the EPA's recommendation that upon determination of the project, Hanson review the current licence and, if necessary, submit a licence variation application that clearly outlines each of the amendments required.

ATTACHMENT B:

NSW Environment Protection Authority (EPA) Recommended Conditions of Approval for proposed Sancrox Quarry Expansion Project (Application SSD-7293) at Sancrox Rd, Wauchope, NSW

10 February 2022

Air Quality

1. The premises must be maintained in a manner that prevents or minimises air emissions, including dust from the premises
2. All operations and activities occurring at the premises must be carried out in a manner that prevents or minimises air emissions including dust from the premises
3. The proponent must prepare and implement an Air Quality Management Plan (the AQMP). The AQMP must include but is not limited to:
 - a. Proactive and reactive management strategies
 - b. Key performance indicators
 - c. Monitoring methods, including location, frequency, and duration of monitoring. Monitoring to be implemented includes continuous ambient air PM₁₀ monitoring conducted in accordance with relevant Australian Standard. A minimum of three PM₁₀ continuous ambient air monitors must be implemented at the premises
 - d. Triggers and actions for nominated monitoring methods. A Trigger, Action, Response Plan that is linked to PM₁₀ ambient air monitoring
 - e. Compliance reporting
 - f. An annual review process to ensure that proactive and reactive management strategies are managing potential offsite impacts.
4. A dust extraction system must be implemented for all drilling at the quarry to prevent or minimise particulate matter emissions
5. Crushers and screens must be fitted with a wet suppression system to prevent or minimise particulate matter emissions
6. Dust suppressant must be regularly applied to all unsealed haul roads to prevent or minimise particulate matter emissions
7. The dry product delivered to the concrete batching plant, recycling plant and asphalt plant must be stored in aggregate storage bays enclosed on three sides. The storage bays must be fitted with water sprays
8. Material outputs from the concrete recycling facility must be stored in storage bays enclosed on three sides. The storage bays must be fitted with water sprays.
9. Material stockpiled in storage bays must be no greater in height than the smallest of the three side walls
10. A vapour balancing system must be utilised to minimise emissions during delivery of bitumen at the asphalt plant
11. All asphalt plant loading points must be totally enclosed. All air emissions generated at the loading points must be captured by a bag filter.

12. A vapour recovery system must be utilised to prevent or minimise emissions during transfer of asphalt to trucks.
13. Cement must be pneumatically conveyed via sealed pipe transfer from delivery tankers to storage silos. Conveying air must be treated by a particulate matter filter.
14. The aggregate feed hopper for the concrete batching plant must be enclosed on three sides and roofed.
15. Cement storage silos must be fitted with a high-level alarm and emergency shut off controls to prevent overflow.
16. Concrete batching loading point(s) to be totally enclosed with all particulate matter emissions generated by the facility captured by a bag filter

Water Quality

17. Water and/or Land Concentration Limits

Point X¹

Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit
Oil and Grease	milligrams per litre				5 &/or Not Visible
pH	-				6.5 - 8.5
Total suspended solids	milligrams per litre				30

18. The concentration limits in the above table do not apply to any discharge from Point (x¹) solely arising from rainfall exceeding the 95th percentile 5-day (consecutive days) rainfall volume of 106.2 mm

NOTE:

¹ = to be determined in consultation with licensee during licence variation.

Noise Limit Conditions

- L6.1** Noise generated at the premises must not exceed the noise limits at the times and locations in the table below. **PROPONENT TO CONFIRM ADDRESSES AND LOT DPS UPDATED NVIA FIGURES 1.2 and 1.3 do not match receiver locations and Table 3.1 appears to have errors in the coordinate system.**

Location	Noise Limits in dB(A)				
	Morning Shoulder	Day	Evening	Night	Night
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{AFmax}
Receiver 14 234 Bushland Drive Sancrox Lot 40 DP1191701	37	37	37	37	47

Receiver 16 220 Bushland Drive Sancro Lot 28 DP255774	36	36	36	36	46
Receiver 33 498 Fernbank Creek Road Fernbank Creek Lot 1 DP200383	35	35	35	35	48
Receiver 34 706 Fernbank Creek Road Fernbank Creek Lot 1 DP318920	38	38	38	38	53
Receiver 35 733 Fernbank Creek Road Fernbank Creek Lot 2 DP805561	37	37	37	37	52
All other residential receivers	35	35	35	35	46

L6.2 For the purposes of condition L6.1:

- Morning Shoulder means the period from 5am to 7am Monday to Saturday and the period from 5am to 8am Sunday and public holidays.
- Day means the period from 7am to 6pm Monday to Saturday and the period from 8am to 6pm Sunday and public holidays.
- Evening means the period from 6pm to 10pm.
- Night means the period from 10pm to 5am Monday to Saturday and the period from 10pm to 5am Sunday and public holidays.

L6.3 Meteorological conditions

- The noise limits set out in condition L6.1 apply under the following meteorological conditions:

Assessment Period	Meteorological Conditions
Day	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Evening	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Night	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level; or Stability category E and F with wind speeds up to and including 2m/s at 10m above ground level.

- For those meteorological conditions not referred to in condition L6.3(a), the noise limits that apply are the noise limits in condition L6.1 plus 5dB.

L6.4 For the purposes of condition L6.3:

- The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station on the premises. (if no on-site weather station, the nearest appropriate BoM site is to be used)
- Stability category shall be determined using the following method from Appendix E of the NSW *Industrial Noise Policy* (NSW EPA, 2000):
 - Pasquill-Gifford stability classification scheme.

L6.5 To assess compliance:

- with the $L_{Aeq(15 \text{ minutes})}$ or the L_{Amax} noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:

- (i) approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to premises; or where applicable,
- (ii) in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable,
- (iii) in an area within 50 metres of the boundary of a National Park or Nature Reserve,
- (iv) at any other location identified in condition L6.1
- b) with the $L_{Aeq(15 \text{ minutes})}$ or the L_{Amax} noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
 - (i) at the reasonably most affected point at a location where there is no residence at the location; or,
 - (ii) at the reasonably most affected point within an area at a location prescribed by condition L6.5 (a).

L6.6 A non-compliance of conditions L6.1 and L6.3 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition L6.5 (a) or L6.5 (b).

NOTE to L6.5 and L6.6: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.

L6.7 For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 in Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017) may be applied, if appropriate, to the noise measurements by the noise monitoring equipment.

L6.8 Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.

M8 Requirement to Monitor Noise

M8.1 Attended noise monitoring must be undertaken in accordance with Condition L6.5 and must:

- a) occur at each location specified in Condition L6.1;
- b) occur quarterly in a reporting period;
- c) occur during each day, evening, night and morning shoulder period as defined in Condition L6.2 for a minimum of:
 - 1.5 hours during the day;
 - 30 minutes during the evening;
 - 1 hour during the night; and
 - 30 minutes during the morning shoulder period.
- d) occur for two consecutive operating days.

Reporting Conditions

R4 Noise Monitoring Report

A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the quarterly monitoring. The assessment must be prepared by a competent person and include:

- a) an assessment of compliance with noise limits presented in Condition L6.1 and L6.3;
- b) An assessment of modifying factors in accordance with Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017); and
- c) an outline of any management actions taken within the monitoring period to address any exceedences of the limits contained in Condition L6.1 and L6.3.

Additions to Definition of Terms of the licence

- Noise Policy for Industry - the document entitled “*Noise Policy for Industry*” published by the NSW Environment Protection Authority in October 2017.
- Industrial Noise Policy - the document entitled “*NSW Industrial Noise Policy*” and application notes published by the NSW Environment Protection Authority.
- Noise – ‘sound pressure levels’ for the purposes of conditions L6.1 to L6.8.
 - L_{Aeq} (15 minute) - the value of the A-weighted sound pressure level of a continuous steady sound that, over a 15 minute time interval, has the same mean square sound pressure level as a sound under consideration with a level that varies with time (Australian Standard AS 1055:2018 *Acoustics: description and measurement of environmental noise*).
 - L_{AFmax} – the maximum sound pressure level of an event measured with a sound level meter satisfying Australian Standard AS IEC 61672.1-2013 *Electroacoustics - Sound level meters - Part 1: Specifications* set to ‘A’ frequency weighting and fast time weighting.

This concludes the EPA’s submission on the proposal.

**Emma Coombs
Operations Officer
Environment Protection Authority**