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By Major Projects Portal

NSW EPA Advice on Environmental Impact Statement
Marsden Park Data Centre (SSD-70889211)

Dear Shaun

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Environmental Impact Statement (EIS) for the proposed Marsden Park Data Centre (SSD-70889211) located at 105 and 113 Hollinsworth Road, Marsden Park.

The EPA has reviewed the following documents:

- *Environmental Impact Statement* – Patch Planning Pty Ltd – 4 November 2024.
- *Air Quality Impact Assessment* – Todoroski Air Sciences Pty Ltd – 28 October 2024
- *Marsden Park Data Centre Acoustics State Significant Development Application Report* – Stantec Australia Pty Ltd – 29 October 2024
- *SEARS Integrated Water Management: Groundwater Impact Assessment* – Stantec Australia Pty Ltd – 28 August 2024
- *Contamination Report* – Stantec Australia Pty Ltd – 1 November 2024
- *Greenhouse Gas Assessment Marsden Park Data Centre* – Stantec Australia Pty Ltd – 1 November 2024
- *Greenhouse Gas Mitigation Plan Marsden Park Data Centre* – Stantec Australia Pty Ltd – 4 November 2024
- *Construction Noise and Vibration Impact Assessment* – Northrop Consulting Engineers Pty Ltd – *26 September 2024.*

The EPA understand the proposal is for:

- Minor site preparation works and the installation of services to enable the construction of the data centre campus.
- Staged construction of six four-storey data centre buildings, each containing: 12 data halls, 12 battery rooms, 40 generators, loading docks, ancillary office space and associated mechanical, electrical and water infrastructure.

Based on the information provided, the proposal is subject to an environment protection licence (EPL) under clause 9 of Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) for *Chemical Storage - petroleum products storage*.

The EPA has reviewed the EIS and notes that it does not provide the information required to allow us to complete our assessment. The EPA has the following comments and recommendations to be addressed prior to determination.

Air Quality

The Air Quality Impact Assessment (AQIA) does not provide enough information to understand the potential risk and impacts of the project. The EPA recommends that the Department of Planning, Housing and Infrastructure (DPHI) requests that the applicant provides further information regarding worst-case emergency scenario, testing scenario of diesel generators, probabilistic worst-case scenario, in-stack emission concentrations, principal toxics and modelled stack pollutants. The EPA's detailed comments are as follows.

1. Worst-case emergency scenario

The AQIA states that the data centre will have an operational capacity of 504 MW however, 240 generators with 3307 kW power provides 793 MW. A 50 % generator load was used for the modelled emergency scenario (216 generators running = 357 MW). The AQIA states that during an event that requires emergency power, varying loads of power would be required. It does not appear that the emergency scenario has been properly modelled to consider actual requirements or the maximum power capacity available that could be used.

Emission performance of oxides of nitrogen of the proposed generators is already poor, and poorest at 100 % load (Table 8.3 of the AQIA). The management of loads is also identified as a mitigation and management measure of emissions. The justification that emission performance is going to be managed through generator load, particularly in an emergency scenario, is not suitable and questions the need for the number of generators proposed.

The Environmental Impact Statement and Greenhouse Gas Assessment provide conflicting information that there will be only 20 standby generators per data centre.

The EPA recommends that DPHI requests the following:

a) Further information and justification of the requirements for the number and size of the diesel generators for the premises.
b) The Applicant assesses a worst-case emergency scenario that considers the maximum loads the diesel generators could operate at.

2. Testing scenario of diesel generators

The AQIA has identified that the testing regime will include both annual testing and monthly testing with a different number of generators, durations and loads for each. However, the AQIA has not provided information on how the monthly 15-minute testing has been modelled to evaluate hourly impacts (i.e. only 15-minute set per hour, or 4x 15-minute sets per hour).

No information has been provided on the location of the generators in the modelling for testing, including if the testing will be done for generators that are exhausted through the same stack or different stacks.

The AQIA has also not provided enough information on how the annual hourly testing aligns with the monthly testing. As the exemption of NOx in-stack concentrations is based on the hours of operation (including testing), clarity on the testing regime is essential. Further, the testing regime should be evaluated as a single scenario, accounting for worst-case testing emissions.

a) The EPA recommends that DPHI requests more information regarding how the monthly and annual testing will align and model a single testing scenario. The single testing scenario should include:
    i. information on the location of the generators modelled
    ii. justification that the locations are representative of worst-case locations
    iii. the number of stacks used
    iv. the emission rates of each modelled point source for the whole hour of modelling

3. Probabilistic worst-case scenario

The emergency worst-case scenario was modelled for every hour of the year, as it is possible it may occur at any hour of the year. The AQIA has undertaken some additional analysis on the probability and duration of a power outage. However, the AQIA has then adjusted the predicted hourly NO_2 impacts without any explanation or justification.

The AQIA states that the average duration of a power outage is 60.1 minutes, therefore the hourly modelling and hourly impacts represent the worst-case impacts and adjusting the predicted impacts is potentially misleading.

a) The EPA considers that the probabilistic scenario is unjustified and recommends to DPHI that it should be not included in the AQIA.

4. In-stack emission concentrations

The proposed facility will be classed as a scheduled premise due to the volume of diesel that will be stored. While the generators are exempt from NOx limits (c73, *POEO Clean Air Regulation 2022*), the generators are required to meet all other scheduled premises emission limits. While the AQIA has provided engine emissions data (Appendix B), no reference conditions have been provided and were often presented at different oxygen reference conditions than the *POEO Clean Air Regulation 2022.*

a) The EPA recommends that DPHI requests from the Applicant expected in-stack emission concentrations for the generators and demonstrate compliance with Group 6 *POEO Clean Air Regulation* limits.

5. Principal toxics

Diesel generators can emit toxics such as polycyclic aromatic hydrocarbons (PAHs) and volatile organic compounds (VOCs) which have not been considered in the AQIA. Given the large number and size of proposed generators and poor engine performance for NOx (similar to US Tier 1), consideration of non-criteria pollutants should also be included in the AQIA.

a) The EPA recommends that DPHI requests the Applicant to update the AQIA to include information regarding the impacts of relevant principal toxics in the emergency and testing modelling scenarios.

6. Modelled stack pollutants

The AQIA states that to improve dispersion, the exhaust from four generators will be consolidated into a single flue stack. Generator emissions rates and stack flow rates have been provided, but modelled emission rates have not been included.

a) The EPA recommends that DPHI requests the Applicant to provide information regarding the modelled stack pollutant emission rates and concentrations.

Greenhouse Gas Assessment

The Greenhouse Gas Assessment (GHG assessment) does not meet the requirements of the NSW EPA Draft Large Emitters Guide and the EPA recommends that DPHI requests that the GHG assessment be revised to address the classification of indirect emissions, update emissions results, provide robust justification of the input data and assumptions made for assessment purposes. The EPA's detailed comments are as follows.

1. Scope 2 emissions

The GHG assessment indicated that due to the Applicant's commercial model, emissions from customer/lessee IT electricity use on the premises were classified as Scope 3 emissions using the Greenhouse Gas Protocol Corporate Standard produced by World Business Council for Sustainable Development & World Resources Institute (2015). However, when applying the EPA's Draft Large Emitters Guide the EPA's position is that for licensing and assessment purposes, all indirect GHG emissions due to electricity use within a licensed premises are Scope 2 emissions.

This is consistent with the EPA's regulatory approach whereby the EPA regulates all activities and operations within the premises. The licensee is responsible for managing emissions and potential environmental impacts due to activities undertaken within a licensed premises.

Furthermore, the EPA's position recognises the Applicant:

- Can influence the final project design to avoid, reduce and substitute emissions as far as is feasible and practicable.
- Will have the ability to purchase electricity that is backed by renewable sources for all operations within the premises.

a) The EPA recommends that DPHI informs the Applicant of the EPA's position regarding Scope 2 emissions for assessment to the EPA's Draft Large Emitters Guide and the EPA's licensing functions. DPHI should also note that this does not preclude the Applicant from using other guidelines or regulatory tools to fulfill their obligations for other jurisdictions.

2. Input data and assumptions made to estimate GHG emissions

Section 2.3.1 nominates the refrigerant and fuel quantities used to estimate Scope 1 emissions due to the proposal. However, the GHG assessment does not include detailed information to transparently demonstrate that the annual quantities used are reflective of the proposed number of generators (240), their fuel consumption and the proposed testing regime. This information is required for the applicant to demonstrate the GHG emissions are not being underestimated. Furthermore, if the project is approved, this information should be included in the GHG mitigation plan:

- To evaluate the project's performance against projected emissions
- To nominate performance indicators or criteria to evaluate whether additional mitigation measures are required for implementation.

a) The EPA recommends that DPHI requests the Applicant amend the GHG assessment to nominate and justify all input data and assumptions made to estimate Scope 1 emissions and clearly show how these are reflective of the number of generators, fuel consumption rates and testing regime during the project's life.

3. Indirect emissions due to electricity usage

The GHG assessment concludes that indirect emissions resulting from electricity use are the main contributor to GHG emissions due to the proposal, which appears reasonable given the scale of electricity consumption proposed to be required.

Table 8 of the GHG assessment shows a summary of GHG emissions for the proposal based on the planned operational throughput. This should be updated to present the total GHG emissions due to electricity use within the premises and separately show all other indirect emissions (Scope 3). An additional table should also be provided to show the estimated indirect emissions due to electricity use based on the maximum throughput.

The above is relevant as it will need to be used by the applicant to forecast the number of Large-Scale Certificates (LGCs) needed to meet their commitment to purchase electricity that is 100% backed by renewable sources from 2031 and onwards.

Considering the proposal will constitute a significant additional load to the grid (approximately 5,639,774 MWh per annum at full load) and therefore, additional large indirect GHG emissions, it is critical that the applicant confirms their commitment to secure access to electricity that is 100% backed by renewable sources.

The EPA recommends that DPHI requests the Applicant:

a) Revise and update Appendix A, Appendix B and Appendix C of the GHG assessment to nominate the planned and maximum operational energy quantities used to estimate indirect emissions due to electricity use within the premises.
b) Include tables showing the total estimated indirect emissions due to electricity use within the premises for the planned and maximum throughput.
c) Confirms their commitment to purchase electricity that is 100% backed by renewable sources from 2031 and onwards.
d) Based on the updated and consolidated total estimated indirect emissions due to electricity use within the premises, the Applicant should discuss the likely availability of the Large-Scale Certificates (LGCs) at the time when it is proposed they will be acquired.

Operational Noise

The operational noise impact assessment (ONIA) did not appear to fulfill the requirements of the Noise Policy for Industry (EPA 2017, NPfI) with issues identified concerning the background noise monitoring, consideration of annoying characteristics, assessment locations, noise modelling inputs and the assessment of impacts.

1. Background noise monitoring

The noise monitoring conducted at location L1 (Thursday 25 July) did not appear to record similar levels to other night periods. The noise level appears relatively constant from the evening on 24 July and remains elevated until it starts to rise in the morning of the 25 July. This does not appear to follow the same pattern as all other weekday nights, and may have been impacted by extraneous noise, or may be atypical of long term background noise levels in the area.

The Northrop attended measurement notes indicated that background noise levels were controlled by frog noise at the location M01, which is close to receivers near to the proposed development. Attended measurements were not conducted by Stantec during the night period to characterise the noise sources which contribute to the measured background noise levels.

Therefore, it is unclear if the background noise levels measured by Stantec also included frog noise and if the frog noise is extraneous noise that is unrepresentative of long term repeatable background noise levels. There is potential risk that both sets of measurements were affected by seasonal and unrepresentative extraneous noise, which may affect the measured background noise levels during the critical night time period.

The EPA recommends that DPHI request:

a) The noise sources which contribute to the noise environment during the night periods in the Stantec measurements be described and quantified.
b) Evidence and justification that noise measurements are representative of long term background noise level at the potentially worst affected receivers in the absence of extraneous noise should be provided, or additional measurements supplied.

2. Northrop measurement results

The Northrop measurement results have lower background noise levels than those conducted by Stantec at the retirement village. Therefore, it's not clear why the Northrop measurements were not adopted as the basis for determining the project noise trigger levels for the retirement village.

a) The EPA recommends that DPHI requests the applicant justify the use of the higher background noise levels for the retirement village in the assessment or amend the assessment accordingly.

3. Adjustment of Amenity Noise Level

Section 4.1.3.2 of the ONIA states the following:

"A meeting with NSW EPA was held on the 18th of September 2024 to discuss the determination of criteria for the project. From this meeting, Stantec inquired for clarity surrounding the +3dB adjustment to amenity criteria to convert from a period level to a 15min and whether it was applicable to a project of this nature. The NSW EPA confirmed that the +3dBA correction is to be upheld for establishing the criteria for the development. As such, the project teams subsequently concluded to adopt a 38dB(A) criteria for the night time as the most stringent relevant project noise trigger level."

The EPA's comments in the meeting were to confirm the Noise Policy for Industry (NPfI) position on the correction to the amenity criteria is an addition of +3dB to the $L_{eq,period}$ to convert it to $L_{eq,15min}$ with alternative corrections possible provided they are supported with robust evidence. It is the responsibility of the applicant to provide justification for the project noise trigger levels applied to the project.

a) The EPA recommends that DPHI takes note of the EPA's position regarding corrections to the $L_{eq,period}$ to convert it to $L_{eq,15min}$.

4. Annoying Characteristics

Table 4-3 does not appear consistent with Fact Sheet C of the Noise Policy for Industry (NPfI). The assessment requirements for low frequency noise are incomplete, and Fact Sheet C does not include a correction for impulsive noise.

a) The EPA recommends that DPHI request the Applicant to amend the noise assessment and any applicable corrections to consider Fact Sheet C from the NSW EPA's NPfI (2017).

5. Protection of the Environment Operations Act

The EPA understands that the premises will require an environment protection licence due to the capacity to store diesel fuel, and not electricity generation. Operational noise associated with all activities carried out on the premises are to be assessed and will be regulated through an environment protection licence.

a) The EPA recommends that DPHI notes that as the premises will be required to be licensed under the POEO Act, operational noise associated with all activities on the premises are required to be assessed.

6. Assessment locations

The assessment appears to have only considered the closest sensitive receivers. However, the assessment location according to the NPfI is potentially most affected location, which depends on a number of site-specific factors and therefore may not be the closest to the development. This is particularly relevant where topography or receiver height may affect the propagation of noise including where receivers located further away from the development receive higher noise levels due to the effect of topography reducing the screening effect of other objects.

A review of the noise contour plots appears to show yellow markers where receivers are located in the model. However other residences appear to have potentially higher contour values than those residences marked with the receiver location. This effect may also be increased at the two storey dwellings in the residential area.

The assessment has not provided evidence that the reasonably most affected locations have been assessed, therefore additional information is required to establish if the potentially most affected receiver has been considered in the assessment.

a) The EPA recommends that DPHI requests the Applicant demonstrates the potentially most affected locations have been assessed and amend the assessment as required.

7. Internal noise levels and potential audibility of the development

Section 5.5 of the ONIA states the following:
Further to the above, the acoustic assessment has been conducted to the boundary or the most affected point on a property as per the requirements of the NSW EPA NPI. When considering the noise intrusion into a habitable area of a residential property, it is expected to be significantly reduced due to the attenuation provided by the building's façade. This means that while boundary levels might be higher, the actual impact on indoor noise levels is considerably lower and likely to be inaudible

The NPfI applies to external noise levels only for residential receivers and does not provide for an assessment of internal noise levels, nor audibility of noise sources. Therefore, whilst there is no requirement to assess internal noise levels or audibility, the EPA notes that there is not sufficient evidence within the assessment to support the statement that the data centre would likely be inaudible within residential properties.
The EPA notes that where noise levels are below the project noise trigger levels, this does not necessarily mean the development will be inaudible to residents.

a) The EPA recommends that DPHI notes the EPA's comments regarding internal noise levels and potential audibility of the development.

8. Low frequency noise assessment

The frequency spectra used for the noise sources in Table 5-2 of the ONIA appear to be limited to 63Hz as the lowest frequency band. This does not meet the frequency spectrum requirements for the low frequency screening test in NPfI Fact Sheet C and it misses potentially critical parts of the spectrum below 63Hz. These frequency bands can substantially contribute to the difference between C weighted and A weighted noise levels. There is an unknown level of risk associated with not assessing the noise levels across a sufficient spectral range.

a) The EPA recommends that DPHI requests the Applicant amend the noise assessment to consider frequency bands below 63Hz as part of the noise assessment and low frequency characteristics test and meets the requirements of NPfI Fact Sheet C.

9. Ambient temperature assumptions

The assumed worst-case evening and night period temperature is 28 degrees. The applicant should provide evidence such as climatic data or projections that this temperature is representative of a worst-case scenario and provide a consideration of how the temperature and relative humidity affects the duty on the chillers.

Worst-case evening period temperatures would be expected to be higher than night periods, especially during daylight savings when the sun does not set until well after 6pm which is when the evening period begins. As a result its not clear if its appropriate to assume that chillers would operate at the same duty during the evening and night period when there is potential for evening period temperatures to be higher than during the night.

a) The EPA recommends that DPHI requests the Applicant clarify and amend where required the assumptions used for ambient temperatures, relative humidity and chiller duty levels during the evening and night periods.

10. Substation

The substation proposed as part of the development does not appear to have been included in the assessment. Substations have the potential to generate low frequency noise as well as general industrial noise and should be accounted for in the assessment.

a) The EPA recommends that DPHI requests the Applicant to consider the risk and noise impacts the substation will have as part of the ONIA.

11. Noise contour plots

The noise contour plots supplied with the ONIA do not appear to cover sufficient areas of the residential receivers to the south of the development and the retirement village. The plots only appear to cover the first row of residential receivers and in some areas, the plots appear to show higher noise levels towards the second row of houses compared with the first. This implies that receivers further back from the development, and potentially at a higher elevation may have higher noise levels than those closer in.

a) The EPA recommends that DPHI requests from the Applicant amended noise contour plots that cover a sufficient area of residential receivers (including the retirement village) to demonstrate the assessment has considered how noise propagates through the area and considers the potentially most-affected receivers.

12. Generator testing assessment scenario

Section 5.5 of the ONIA states the following:
Based on the results above for typical operation scenario (Scenario 1) and maintenance scenario (Scenario 2), the noise impact to all surrounding receivers are expected to comply with the established noise criteria for all time periods and stability categories.

This statement is not supported by the results as the assessment indicated a 1 dB exceedance at receiver R1 117 Stockholm Avenue during the day period under Scenario 2 stage 3. The note to table 5-4 refers to this exceedance as follows:
1-2dB(A) is not deemed a perceptible change in noise level. Furthermore, this scenario is descriptive of the worst-case testing scenario and is expected to be short-term impact and therefore not expected to cause any adverse impact to the receiver.

The NPfI requires that if predicted noise levels are above the project noise trigger level, all feasible and reasonable mitigation is applied prior to assessment of residual impacts. There does not appear to be any discussion to demonstrate that all feasible and reasonable mitigation measures have been applied for the generator testing scenario. The assumptions in Section 5.4 mention that no more than 10 generators at a time would be tested, however there is no mention of generator mitigation in Section 5.3.1. As a result its not clear how testing schemes or other mitigation has been investigated to reduce noise levels below the project noise trigger levels.

The assessment does not provide sufficient detail to understand which generators are active during the assessment of generator testing schemes, or how the worst-case scenario was determined. For example, the worst case for receivers in the south, the retirement village and the place of worship are likely to be different due to their different orientations to the premises. Therefore, it is difficult to understand if the scenario is a representative assessment.

The sound power levels appear to only include one sound power level to characterise the generators. However, generators can have several noise sources that make up the total noise emission and cause directivity of noise emissions. Generators typically have noise sources associated with inlets, exhausts, and enclosures and the sound emission can vary depending on the orientation towards receivers. In some cases, generators may have common exhausts as outlined in the AQIA.

The testing of generators is a routine operation at the premises and presently the information provided in the assessment indicates an unknown level of risk, which should be addressed by further information.

The EPA recommends that DPHI requests from the Applicant the following additional information:

a) The assumptions used, and design of, generator testing scenarios including the location of the generators assumed to be on
b) How the location of each group of sensitive receivers relative to the premises was considered in the scenario
c) Demonstration that all feasible and reasonable mitigation has been applied to the generating testing, including any at-source measures for the generators, and the number and location of generators being tested at any one time
d) Clarification of the sound power level(s) used for the generators, how they represent the different noise sources and how directivity of sources was considered in the assessment.
e) Consideration of other generator testing scenarios which may cause exceedances and indication of the frequency and duration of generator testing.

Construction noise and vibration

A number of matters were identified in the construction noise and vibration assessment which require clarification, amendment or additional information.

1. Background noise measurements

The background noise measurements in the construction noise and vibration assessment (CNVIA) only appear to reference those carried out by Stantec. However, in the ONIA both measurements done by Stantec and Northrop are referenced.

a) The EPA recommends that DPHI requests from the Applicant to clarify the measurements used in each assessment and ensure consistency between them, and where consistency is not considered appropriate, a justification must be provided.

2. Construction noise modelling inputs and assumptions

There were a number of matters identified with the construction noise modelling inputs and assumptions as follows:

- The ground absorption values used for the CNVIA and ONIA noise modelling are not consistent. The CNVIA used a more absorptive ground absorption (0.5) than the ONIA (0.2). The value in the operational assessment appears more likely to be representative of the ground conditions within the industrial and residential areas.
- CNVIA Table 7 defines construction scenario 2 as representing excavation and piling activities. However, in CNVIA Table 11 no noise source for any piling equipment has been included.
- Section 4.3.2 of the CNVIA states that construction noise would be evenly distributed across the site. However, the project is built in stages and has discrete buildings to be constructed therefore activities would be expected to be concentrated around certain locations such as the stage location or a particular building. Therefore, it is unclear if this assumption is representative of the proposed construction.
- The construction assessment also states that it has assumed all plant and equipment are operating concurrently and that actual levels would be lower than those presented in the report. However, its not clear why this approach has been taken when it would appear more useful to present reasonably foreseeable construction scenarios so that mitigation and work practices can be developed for the activities that may actually take place instead of unrealistic scenarios where mitigation may not be suitable as the scenarios are unrepresentative.

a) The EPA recommends that DPHI requests the Applicant to address the above matters raised on the construction noise modelling and amend the assessment accordingly.

3. Out of hours work

Section 4.1.1 of the CNVIA states that the construction hours will be

- Monday to Friday 7am to 6pm
- Saturday 8am to 1pm
- No work on Sundays or public holidays

The State Significant Development application has applied for work hours that are consistent with the Interim Construction Noise Guideline (ICNG) standard working hours. Therefore, it is not clear why the CNVIA has included an assessment of construction noise for activities done outside of standard hours.

a) The EPA recommends that DPHI consider requiring construction work to be undertaken during standard working hours in accordance with the ICNG, with exceptions to the hours only permitted according to Section 2.3 of the ICNG.

4. Construction noise mitigation

The recommended construction noise mitigation measures are generic and are provided without any assessment of what could be implemented and limited information regarding the potential noise reduction or benefit.

For example, its not clear if enclosures as suggested in CNVIA Table 19 are possible for any of the activities or items of equipment proposed. Another example is which activities have been identified that could use quieter equipment or methods.

The predicted noise levels are stated to be unlikely to occur and also in some cases appear not to have included equipment likely to be used in a certain activity (see item 2). Therefore its not clear what the realistic level of impact may be and therefore what mitigation measures would be appropriate.

a) The EPA recommends that DPHI requests the applicant to provide an assessment of reasonable and feasible mitigation and work practices to manage construction noise and vibration as required by the ICNG.

Dangerous goods – handling, storage and transport

The NSW EPA provided advice in May 2024 to DPHI on the Secretary's Environmental Assessment Requirements for this Proposal (our ref: DOC24/387689-4). The EPA requested that the Applicant *"Provide details of procedures for the assessment, handling, storage, transport and disposal of all hazardous and dangerous materials used, stored, processed or disposed of at the site, in addition to the requirements for liquid and non-liquid wastes."* The EIS does not adequately address this information and the EPA recommends that DPHI requests the Applicant:

a) Provide details of procedures for the assessment, handling, storage, transport and disposal of all hazardous and dangerous materials used, stored, processed or disposed of at the site, in addition to the requirements for liquid and non-liquid wastes.
b) Provide details of the type and quantity of any chemical substances to be used or stored and describe arrangements for their safe use and storage.
c) Reference should be made to the guidelines: EPA's Waste Classification Guidelines 2014 (as amended from time to time).
d) Spill management measures, including items such as bunding, and emergency procedures should be clearly outlined.

If you have any questions about this request, please contact Jenny Gustafson at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely

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