



17 Carlotta Street

Greenwich

NSW 2065

ABN 81614383952

T: 0417 106 665

E: brian@emeadvisory.com

Kelly McNicol
Team Leader, Industry Assessments
Planning Services
NSW Department of Planning and Environment

kelly.mcnicol@planning.nsw.gov.au
bianca.thornton@planning.nsw.gov.au

24th June 2019

Re: Cleanaway ResourceCo RRF Modification 4 - 24/7 operations (SSD-7256-Mod-4)
Request for Additional Information

Dear Kelly,

I refer to your letter of 18th June 2019 in relation to the above matter requesting additional information to addresses the issues identified in the EPA's letter dated 13th June 2019.

The EPA's letter requests additional information in relation to the Acoustic Report prepared by Wilkinson Murray in support of the Modification Application. A response to the request for additional information has been prepared by Wilkinson Murray and is provided as Appendix A to this letter.

It is noted that the Acoustic Report was also reviewed by Fairfield Council and that Council's submissions of 5th June 2019 concluded that there was no objection to the Modification Application.

Should require any further information or clarification, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Brian Cullinane'.

Brian Cullinane

Director, EME Advisory

T: 0417 106 665

E: brian@emeadvisory.com

Appendix A: Wilkinson Murray response to Issues Raised by EPA in relation to Acoustic Report

18 June 2019

WM Project Number: 15278-N1

Our Ref: R180619 NG

Email: brian@emeadvisory.com

Mr Brian Cullinane
EME Advisory
17 Carlotta Street
GREENWICH NSW 2065

Dear Brian

Re: ResourceCo, Frank Street - Noise Clarifications

INTRODUCTION

Wilkinson Murray undertook an assessment of potential noise impacts for the original assessment in our report of 2017 and have recently considered the proposed modification to allow for 24 hour operations in a report 15278-N1 of May 2019. Both Fairfield Council and EPA have reviewed the report.

ResourceCo Site Location



Fairfield Council have considered given the ResourceCo location in the middle of an industrial area separated to the nearest residences by over 800m, that the conclusion of the assessment by Wilkinson Murray is likely to be reasonable and have accepted the report and have no objection to the application.

The NSW EPA have sought a number of clarifications. *"The EPA has reviewed the modification application prepared by ResourceCo and the acoustic report prepared by Wilkinson Murry. The EPA requires some further information regarding the acoustic report (the Report). Please provide further details as specified below":*

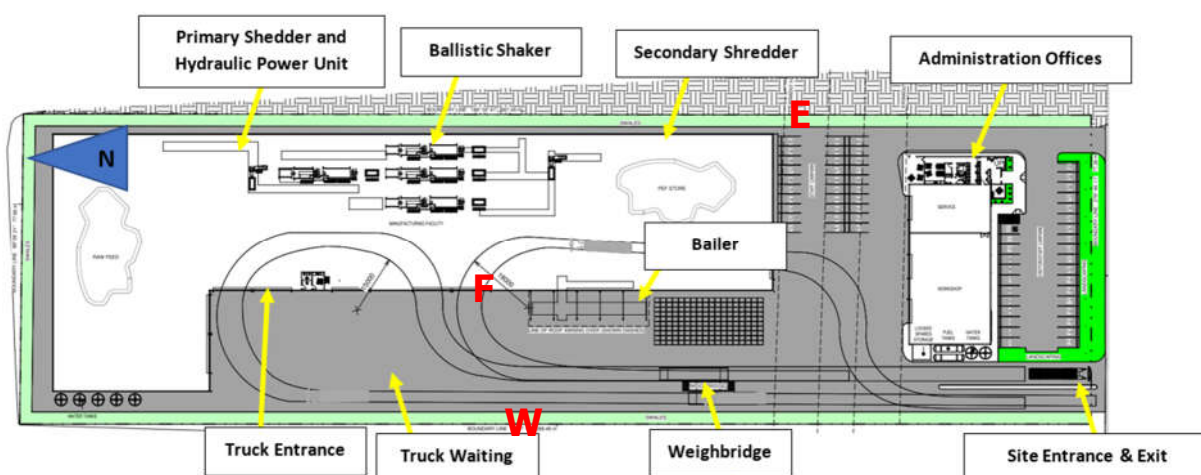
This letter responds to those clarifications, and includes extracts from our report.

CLARIFICATIONS

- The Report references monitoring that was conducted at the facade openings. Further clarification is required specifying exactly where monitoring was undertaken, including the location displayed on a map. If the monitoring was conducted outside the building, confirmation is required whether the door into the building was open or closed.

Refer plan from report with monitoring locations highlighted. F is the facade location described as at one of the openings. W is for western boundary and E for eastern boundary near the entrance. Doors on the west were in their normal position some of which were open during the measurements.

ResourceCo Facility Layout



- If modelling has been used for this assessment, please inform the EPA which model was used and provide the noise contours from this model.

No computer modelling was necessary for such significant distances and intervening shielding by buildings.

- Section 3.6 of the Report details the calculation of the operational noise of the site and the calculated noise level at the receiver. There are insufficient details about how these calculations were made in the Report. The EPA requires some clarification on what assumptions have been made regarding reductions in noise levels over distance. This includes how much of a decrease has been assumed from geometric spreading, an explanation on what other propagation losses (if any) have been assumed and the amount of sound level decrease these losses have assumed.

Geometric spreading (6dB per doubling of distance) was assumed with a nominal 10dB (conservative) for shielding by buildings.

- Section 2.5 of the Noise Policy for Industry specifies that sleep disturbance from maximum noise level events from premises during the night-time period needs to be considered. It does not appear that the report has undertaken an assessment of sleep disturbance. Given that the operations are now being conducted over the night time period, please include this assessment in your calculations and determine whether the proposal is still compliant.

The EPA are correct that we didn't undertake a maximum noise levels assessment. One was not undertaken for the original report even though some activities did occur on site in the night time period. Given the location and the Leq noise levels are predicted to be so low and maximum noise levels are not significantly higher from typical operations it was considered extremely low risk so not assessed.

Our attended measurements confirmed activities were inaudible and we would expect this to be the case at all times, including night time so activities would comply with any criteria in relation to sleep disturbance.

- The EPA understands that the premises has plant and equipment where the noise source contains certain characteristics, such as tonality, intermittency, irregularity or low frequency content. The Report should be updated to include any appropriate corrections for annoying noise characteristics.

We consider the corrections for these characteristics only need to be applied if they can be detected at the residences. Since operations are inaudible no correction is necessary.

We trust this information is sufficient. Please contact us if you have any further queries.

Yours faithfully

WILKINSON MURRAY

A handwritten signature in black ink, appearing to read 'N.L. Gross', with a large, stylized loop at the bottom.

Neil Gross
Director