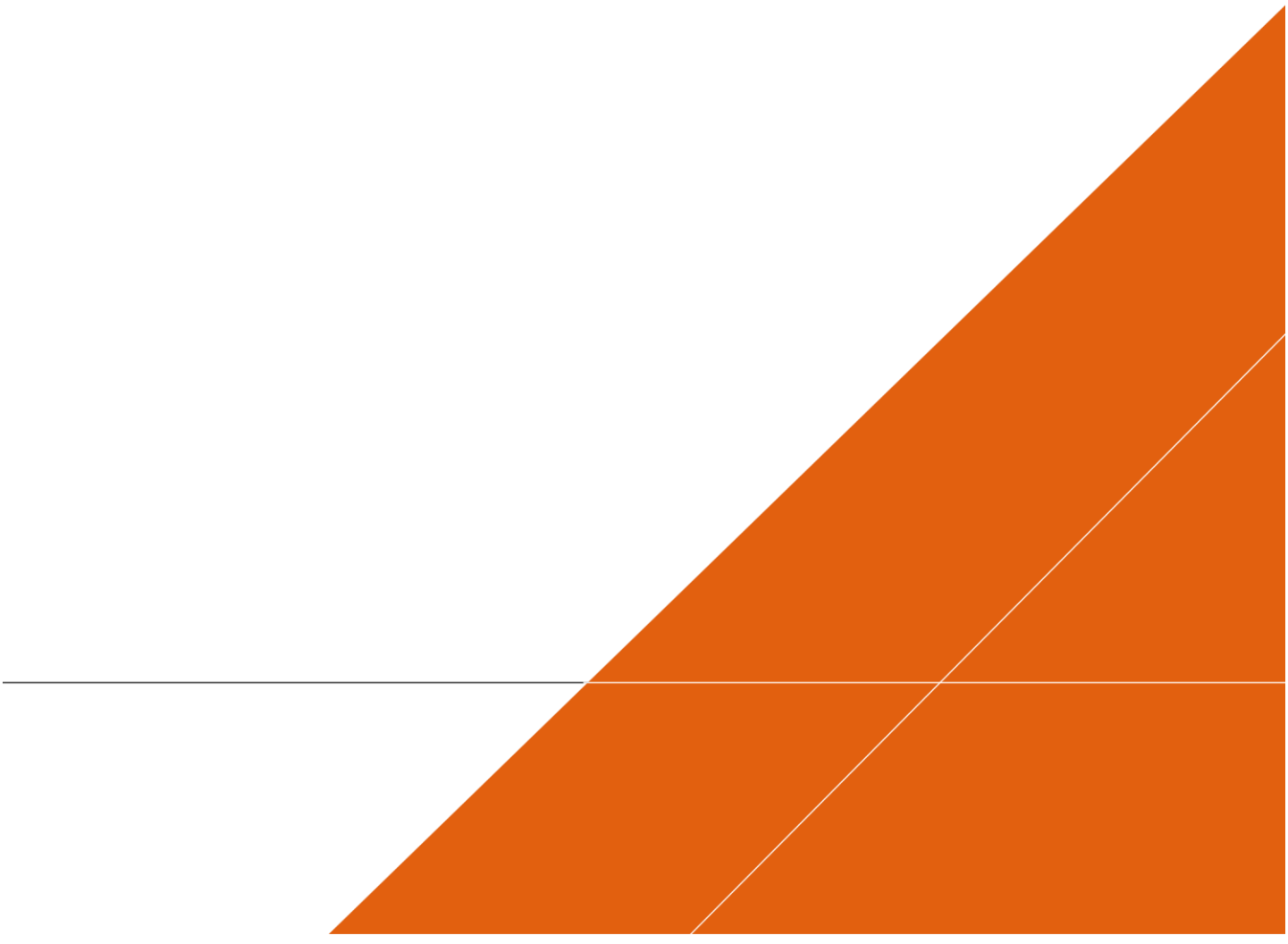
ARCADIS Design & Consultancy for natural and built assets

# KINGS PARK METAL RECOVERY AND RECYCLING FACILITY EXPANSION

## 23-43 and 45 Tattersall Road, Kings Park - Sell & Parker Pty Ltd

## Response to Submissions – Additional RFIs

21 DECEMBER 2021



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## ANNEXURES

# RESPONSE TO ADDITIONAL RFI'S

Sell & Parker (the Applicant) is seeking approval for the expansion of throughput of an existing Resource Recovery Facility (RRF) located at 23-43 and 45 Tattersall Road, Kings Park (the Proposal Site). The Proposal would allow an increase of the throughput limit of the existing RRF from 350,000 to 600,000 tonnes per annum (tpa) of scrap metal.

An Environmental Impact Statement (EIS) was prepared to seek approval for the Proposal under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (SSD 10396). In particular, the EIS was prepared to address, and be consistent with, the Secretary's Environmental Assessment Requirements (SEARs) issued on 19 December 2019 by the Department of Planning, Industry and Environment (DPIE).

The EIS was publicly exhibited between 1 October 2020 and 29 October 2020. During this exhibition period submissions were invited from all stakeholders, including members of the community and government agencies.

The submissions received during the public exhibition of the EIS were review and responded to in a Response to Submissions (RtS) report which was submitted through the Major Project Planning Portal on 2nd August 2021.

On the 1st September 2021 a letter was received from DPIE requesting further information and assessment as identified by stakeholders including:

- The Department of Planning, Industry and Environment (DPIE)
- The NSW Environment Protection Authority (EPA)
- The Environment, Energy and Science Group (EES) of DPIE
- Blacktown City Council

Subsequent to this, a letter from Sydney Water to DPIE dated 5 September 2021 was provided which included additional comments.

This document has been prepared to provide further information and clarification on the comments raised to facilitate determination of the Proposal.

## Consultation

In preparing these responses the following meetings were undertaken to clarify the issues raised and gain concurrence on the approach to responses:

- Meeting with DPIE and EPA on 13 September 2021 to discuss the air quality responses
- Meeting with DPIE and EPA on 15 September 2021 to discuss the noise responses

## Additional Management Measures

Based on the review of agency comments on the RTS report and on outcomes of additional studies undertaken to address these comments, a number of additional management measures are proposed. These are:

**Flooding**

- Sell & Parker will consult with the State Emergency Service and take comments into account prior to completing the Early Warning Flood Readiness Plan (referenced in EIS mitigation measure 5A).

**Air Quality**

- The next scheduled NATA accredited emission testing event on the Hammermill ECS under EPL 11555 will be extended in scope to include measurement of NOX, H2S, HF and HCl, Cl2 and odour, in addition to the requirement for the measurement of particulates, particulate and vapour phase metals.

- Sell & Parker currently and will continue to review its oxycutting operations and emissions from the Oxycutter. There is no requirement or request to increase oxycutting hours, and Sell & Parker expect that the current level of oxycutting will stay similar to current level.
- A number of additional dust control measures identified through a Best Management Practice Dust Control assessment will be implemented including;
    - Continued use of road sweepers to manage road silt content with the purchase of a larger sweeper, and physical removal of silt build up from road verges after large rain events
    - Enclosure of the conveyor transfer points (where safety allows)
    - Use of targeted water sprays on all appropriate handling and transfer points, ensuring that run off is appropriately captured, filtered and discharged or recycled
    - Minimisation of drop heights on all handling and transfer points
- The current Air Quality Management System Configuration, location, metrics and trigger points will be periodically reviewed.

Refer to the Revised Air Quality Impact Assessment (Annexure A) for more detail.

**Noise**

- The proposed noise barrier on the south-eastern boundary of the site will be increased from the current 7-8m to 16m in height, which has been assessed as the height required to have a reasonable and feasible benefit in noise reduction.

Refer to the Revised Noise Impact Assessment (Annexure B) for more background on the performance of the proposed noise barrier. A visual assessment is provided in this document.

## Updated Site Plan

An updated site plan (Annexure C) has been provided with this submission. This incorporates minor graphic changes only, for the purposes of improved clarity.

# Department of Planning Industry and Environment

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| **Waste Processing** | |
| (a) As the Department requires an accurate picture of the proposed operations, please provide<br>a. a detailed process description,<br>b. including a flow chart. | Approval of this expansion would not see any change in waste types, equipment, processing methodology or operational process. What approval of the expansion will allow Sell & Parker to do is to be more efficient and to fully utilise the existing equipment.<br>Our EIS, Section 2.5 sets out details of our operational areas and the related flow chart of the scrap metal process. We have included a further flowchart (Annexure D) which specifically steps out the process of recycling for the incoming scrap metal and which is our existing process.<br>When reading these sections, tables and flowcharts together with the further processing flow chart provided, the Department has a clear picture of how the operations work.<br>Also included in Annexure D is a detailed process description. Note that this process information is commercial in confidence. |
| **Waste Storage** | |
| 2. The RTS states that the stockpile plan (SP) demonstrates sufficient capacity to ensure good stockpile management at the end of daily operations. However, it is noted that only an average height and volume has been provided for the stockpiles, and only for combustible material.<br>(a) Please provide information on<br>1. the maximum volume and height of all proposed stockpiles onsite and<br>2. describe how these would be monitored and maintained.<br>3. Please also describe the maximum volume of waste to be stored at any one time. | **2(a) 1 – Stockpiles on site at end of day**<br>Sell & Parker rely on the Final Stockpile Plan Revision 02 dated 28 July, 2021 (**Stockpile Plan**) and which has been approved under proceedings [2021] NSWLEC 1563 and Fire Rescue NSW on 6 August 2021. This was the version of the stockpile plan that was included as Appendix G in the Response to Submissions report but is resubmitted here as Annexure E).<br>The Stockpile Plan sets out clearly the average height and dimensions of the combustible stockpiles along with the tonnes on the reference table and legend set out on the Stockpile Plan. It should be noted that any number (or no number) of the combustible stockpiles are in operation at the end of daily operations<br>The approved Stockpile Plan has included areas where non-combustible materials may be stored (as denoted by the light blue shaded areas) on the Stockpile Plan. These stockpile areas may not be utilised, be partially utilised or be fully utilised at various times according to the type and amount of scrap that is received. |

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| | Heights and volume of non-combustible material are dependent on the type of and amount of materials coming in and may be adjusted accordingly. The physical size of non-combustible material may also vary, which may impact the height and volume of a stockpile for example rail lengths and wire reels.<br>Non-combustible stockpiles could be<br>• as high as 8 m depending on material type and size, and turnover; and<br>• volume could range from less than 100kg per cubic metre (for example 15 flyscreens) to approximately 1T per cubic metre, being something akin to railway line once cut into smaller pieces.<br>Notwithstanding the provision of this additional information above, it is to be noted and is relied upon by Sell & Parker, that Commissioner Gray found in those proceedings, '*as a matter of merit, there is no basis upon which additional particularisation of the non-combustible stockpiles is required and that there is no evidence to support showing a maximum height of the combustible stockpiles. Accordingly I reviewed the Final Plan and I am satisfied that it is sufficient and consistent with the site plan approved*'<br><br>**2(a) 2 Monitoring & Maintenance of stockpiles**<br>All stockpiles are inspected by various members of staff according to our Stockpile checklist. As the majority of our stockpiles are end of day stockpiles, maintenance is not really a requirement as they become working piles at the commencement of operations the next day.<br>The following is a highlight of our processes and further detailed information can be found in the detailed process description (Annexure D)<br>The Stockpile Plan identifies the locations of the combustible stockpiles, categorised by type and stage of processing, such as inspected shredder feed, delivered shredder feed, automotive, and pre-shredded automotive, which is consistent with the operational flow described above. The Stockpile Plan also shows the locations where non-combustible waste materials or finished (non-combustible) product is stored.<br>1. the Stockpile Plan as provided shows our end of day Stockpile Plan as it relates to combustible material (red hatched areas). Any material remaining at the end of one day is moved from the working pile into these stockpiles (red hatched areas on Stockpile Plan). Upon commencement of operations the next day these |

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| | stockpiles will become the working pile and put through the shredder.<br>2. Finished product – is removed a number of times every day and transported to the respective purchaser. Risk assessment of this stockpile is low as it is non-combustible, and it is 'turned around' quickly.<br>3. The 'Heavy' Pile and other related non-combustible stockpiles are also low risk. Some stockpiles (for example car rims) may be built up over a number of weeks and then sold. That same area may then be used to collect aluminium or any other non-combustible stockpile.<br>4. Floc – Floc is the residual waste resulting from the recycling of scrap metal. It is removed from site with a specialist contractor who provides appropriate vehicle scheduling (a minimum of 3 trucks on turnaround) and the waste is disposed of at a appropriately licensed facility.<br><br>**2(a) 3. Maximum Volume**<br>The maximum volume of material being stored at any one time will vary depending on the nature of the market that is either supplying Sell & Parker, or Sell & Parker supplying the market. The approximate combined maximum volume of our combustible stockpiles is set out on our Stockpile Plan at 12,524m3. The non combustible stockpile maximum volume combined is approximately 90,392m3. Our stockpiling is not a process of continual growth but rather a balanced and systematic approach to materials input, processing, output, storage and sale or removal from site. . |
| 3. The SP provided as Appendix G in the RTS indicates<br>(a) that there would be no access into and through the Non-Ferrous Building (Building B) and<br>(b) limited access through the Post-shredder Processing Building (Building C).<br>(c) In addition, the area around the existing shear appears to contain one large stockpile. | Sell & Parker do not intend to make changes to the stockpile plan *Final Stockpile Plan Revision 02 dated 28 July, 2021* (**Stockpile Plan**) and which has been approved under proceedings [2021] NSWLEC 1563 and Fire Rescue NSW on 6 August 2021 date and submitted with the Response to Submissions Report.<br>It was accepted by the Commissioner in the above proceedings and the expert (being FRNSW) that the stockpile plan is consistent with the site plan, and '*provides adequate detail of the swept paths for articulated vehicles, such that there is reasonable access to the site…..'* Further, the court accepted *'that the site operates with three types of incoming scrap metal streams for the materials received on site, with only one incoming stream, the light gauge ferrous (or black* |

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| | *iron) containing combustible materials. This stream is processed to separate combustible material from the non-combustible, and any unprocessed light gauge ferrous is stored in combustible stockpiles. The processes in place for the movement of incoming materials ensure that the incoming loads of materials are graded on arrival into one of the three streams before they are offloaded, and are quarantined if material is found that is not consistent with what they have been graded. The separation of combustible materials and non-combustible materials is clear from the everyday processes in place at the site.*<br><br>In respect of the specific points raised in regarding the Stockpile Plan as Appendix G of the RTS<br>(a) All access and egress points are shown on the site plan (Annexure C). ; and<br><br>(b) The area around the shear does contain a non-combustible stockpile as demonstrated in the light blue shading in the approved Stockpile Plan, and this does not impact access into either of the buildings or the path of travel through the site, as is demonstrated in the swept path analysis contained in the Annexure F. |
| Please provide a revised SP that demonstrates how the site operates<br>1. on a day to day basis including how access is maintained to the relevant buildings,<br>2. how stockpiles are accessed by trucks and loaded/unloaded or moved around the site.<br>3. Please include swept paths showing that trucks can access a stockpile as required.<br>The Department notes Schedule 1 of the Environmental Planning and Assessment Regulation 2000 requires the development application be accompanied by a sketch of the development which makes provision for the movement of vehicles within the site. | The Stockpile Plan does not demonstrate how the site operates<br>1. Annexure F demonstrates our vehicle movements and stacking around the site. In addition, medium rigid vehicles would enter the non-ferrous shed (building B) via the roller doors located along the northern boundary of the building. This is an existing operation, of which, there is sufficient area for MRVs to enter and exit, and manoeuvre internally within the building. Further information regarding building egress is shown in the approved Building Evacuation Plans (Annexure K).<br>2. Our Stockpile Plan is an end of day stockpile plan when there are no truck movements. Please see our Detailed Operational Process at Annexure D However, during operational hours scrap metal material is placed in designated areas of the yard according to type, eg Heavy or combustible. If any combustible material is present in any load, then this is dropped into our working pile and then processed through the shredder. Loads of finished goods and floc are loaded into trucks, for Floc we have a minimum of 3 trucks |

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| | removing this material from site every operational day under the supervision of yard staff.<br>3. The swept paths have been set out in the approved Stockpile Plan (in green) around the stockpiles and buildings. We refer to the judgement in the recent Class 1 proceedings, where Commissioner Gray stated that the stockpile plan is consistent with the site plan, and '*provides adequate detail of the swept paths for articulated vehicles, such that there is reasonable access to the site…..*: The Commissioner then goes further<br><br>*'It clearly particularises the location of pre-shredder, the combustible stockpiles and the means of circulation and access. It is presented in a form that overlays the stockpile details on the details in the MOD 3 site plan so that the site infrastructure is now also shown. It also provides sufficient indication of the location for storage of non-combustible material. There is no basis upon which additional particularisation of the non-combustible stockpiles is required and that there is no evidence to support showing a maximum height of the combustible stockpiles in circumstances where the average height and maximum volume is clearly shown.*<br><br>The requirement for a sketch which makes provision for the movement of vehicles within the site is met by Attachment 1 in the supplementary traffic information (Annexure F). |
| 4. The RTS states that the area to the south of Building C was previously used to store parts and equipment at the time the NearMap image was photographed. However, according to NearMap, the area to the south of Building C has continued to be used for storage for the last year.<br>Please describe<br>1. what plant and equipment is stored in this area and<br>2. demonstrate how the site can operate without this 'storage' area noting this area is approved as a carpark under SSD 5041. | 1. Non-combustible materials only are stored in this area to the south of Building C. It is not a permanent storage area and it is used as incidental storage area for items like bins, large spare parts, cranes and the like.<br><br>2. The site has been successfully operating without this area being used as a car park as there is ample carparking in the Tattersall Road carpark for vehicles. Further,<br>a. This proposal seeks to formalise the change of use from a carpark to reflect the use as a truck stacking area. – see the TTPP report.<br>b. The items of plant and equipment currently located here will be moved to other areas of this site or other sites as required. |

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| (a) A number of public submissions, including neighbouring businesses, raised significant concerns about existing dust from the site.<br>(b) While the RTS addressed the submissions by stating that modelling demonstrated compliance with the dust deposition criteria, it does not appear that the potential for existing dust emissions was acknowledged or that dust deposition was assessed at receivers R10-R19.<br>(c) Please appropriately address submissions regarding dust deposition. | (a) The concerns have been noted. The neighbouring site to the west is no longer operational and the property has been purchased by interests associated with Sell & Parker.<br>(b) Dust deposition is assessed in detail. Refer in particular to Section 6.5 of the Revised Air Quality Impact Assessment (Annexure A). Table 25 in this section of the report included dust deposition predictions at R10-R19.<br>(c) Submissions regarding dust deposition are addressed through the detailed dust deposition assessment, in particular Section 6.5 of the Revised Air Quality Impact Assessment (Annexure A). |
| **Traffic** | |
| 1. It would appear that Figure 6-1 in the Traffic Assessment (Appendix E of the EIS) shows heavy vehicles queuing/stacking in areas shown as stockpiles in the SP (Appendix G of the RTS).<br>2. Please provide an amended Figure 6-1 that includes<br>a. the proposed stockpile layouts and<br>b. demonstrates there is sufficient room onsite for vehicle queueing. | A further amended Figure 6-1 is provided here (Annexure F) which shows the stacking arrangement in relation to stockpile locations. This demonstrates that stacking can occur outside areas designated as stockpiles. |
| 3. To demonstrate the stacking analysis represents the peak operational hour, please provide a breakdown of traffic volumes by hour. | An hourly breakdown of traffic volumes is provided in Table 1 of Annexure F. This shows that the peak operational hour is 10am -11am (33 heavy vehicles and 10 light vehicles entering the site). |
| 4. Please describe measures that would be put in place to ensure no trucks are stacked or parked outside the site prior to operation commencing each day. | A small number of trucks that travel from afar may sometimes park legally on Tattersall Road prior to the facility opening. These trucks are not Sell & Parker fleet trucks. They present no safety hazard or have any traffic impact. Nonetheless, Sell & Parker will make best endeavours to communicate to associated truck operators the need to minimise the time parked on Tattersall Road in the early morning. |
| **Visual** | |
| 1. Please provide an assessment of the visual impacts of raising the south-eastern noise wall by 2.2 metres. | As described above, in response to the additional noise assessment the south-eastern fence/noise barrier is now proposed to be raised by 7-9m to a height of 16m above ground. This proposal was identified on the basis of it achieving a tangible noise benefit for residential receptors to the east and that it would have a negligible visual impact. The visual aspects of the higher noise barrier are discussed below. Refer to the revised noise report (Annexure B) for a description of the noise benefit. |

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| | **Visual elements**<br>The new noise wall would comprise a Colourbond structure 16m high that would replace the existing boundary fence, which is approximately 7-8m high. The Colourbond colour would be 'cottage green', which has been chosen to replicate the colour of the existing fence and for its visually recessive properties.<br><br>**Potential views**<br>The residential area east of Sunnyholt Road is the only location that includes both visually sensitive receivers and has potential views of the noise wall. A worst-case view from this area (Anthony Street) has been selected for assessment. For completeness, a view from Tattersall Road from the less visually sensitive Kings Park industrial area is also assessed. The views are shown on Annexure G with annotation indicating the position of the top of the noise barrier.<br><br>***View 1 – Anthony Street, Blacktown***<br>View 1 is from a high point on Anthony Street approximately 600m east of the Sell & Parker site boundary. Note that the photograph is considerably zoomed in (105mm focal length) and exaggerates the prominence of elements of the Sell & Parker site compared with a naked eye view. The view indicates that some elements of the Sell & Parker site are visible, including the overhead conveyer system, the roof of the non-ferrous processing building, and existing fences. All of these elements are below the horizon and are minor components of a broader view that is comprised of a mix of industrial buildings and native vegetation.<br>The proposed noise barrier would be visible in the view, as indicated on the photograph (Annexure G). It would effectively replace the view of the overhead conveyer (the red elements in the view) with a flat dark green element that would be less prominent that the conveyer. It would also screen the roof of the non-ferrous processing building.<br>This view is sensitive, due to it being from a residential area. The impact of the noise barrier would however result in a small positive visual impact, given its colouring would minimise its prominence and it would in turn be screening more visually prominent elements of the site.<br>***View 2 – Tattersall Road, Kings Park***<br>View 2 is at the corner of Romford Road and Tattersall Road, within the Kings Park industrial area and looking west to the Sell & Parker site, the boundary of which is |

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| | approximately 600m to the east. This sensitivity of this view is low, given it is from an industrial area, where visual amenity is not particularly important.<br>The visible elements of the Sell & Parker site in this view are the overhead conveyer the roof of the non-ferrous processing building. This is in the context of a wide variety of industrial buildings along Tattersall Road, which are partially screened by large native street trees.<br>The proposed noise barrier would be visible in this view (as shown in Annexure G). While slightly higher than some of the site elements, it would be less prominent due to its dark green colour. Views would also be transient in most cases, occurring from passing vehicles.<br><br>**Conclusion**<br>Despite the increase in height compared to the existing boundary fence, there are relatively few potential views of the proposed noise barrier. Based on the analysis of those potential views, the visual impact is anticipated to be marginally positive. This is primarily due to it screening more prominent elements of the Sell & Parker site, while it being visually recessive (with its dark green colouring. |
| **Operational noise assessment** | |
| *1. Most affected locations and noise assessment criteria* | |
| 1) Receiver locations that experience (or will experience) the greatest exceedance of operational noise above background noise are deemed as 'most affected' according to EPA's Noise Policy for Industry (NPfI). In determining the most affected locations, the following factors need to be considered:<br>1. Operational activities and source locations<br>2. Receiver type and height<br>3. Distance between the subject site and noise affected community<br>4. Line-of-sight and shielding between the subject site and noise affected community<br>5. Characteristic meteorological conditions in the locality<br>6. Existing background noise levels<br><br>2) The Addendum Noise Impact Assessment (ANIA) provided as part of the RTS has not addressed issues raised by the Department as operational noise and background noise were only assessed at | 1. Noted. The factors listed (a) to (f) have been taken into considered in the updated Noise Report.<br>2. & 3 An updated noise survey was conducted in November 2021 to identify any locations which may require additional monitoring for areas located further east from Sunnyholt Road.<br>.<br>3. As a result of the survey, long term noise monitoring was undertaken at three locations further east of 2 Anthony St, one of which is east of 16 Anthony Street as requested. Refer to Section 4 of the Revised Addendum Noise Impact Assessment (Annexure B)<br><br>4. Noise contours have been produced to extend 700m beyond the subject site boundary which covers the receiver locations located at a higher elevation on Anthony St. Refer to Appendix B of the Revised Addendum Noise Impact Assessment (Annexure B). |

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| 1. 2 Anthony Street (denoted as Receiver R1B in the ANIA) and<br>2. 187 Sunnyholt Road (denoted as Receiver R1A)<br>in the wider catchment area of Blacktown and Kings Langley.<br>3) The Department considers there is the potential for residences east of Charles Street that are located on higher ground and situated further away from the subject site to be more noise affected than the closest residences fronting Sunnyholt Road.<br>4) The Department's previous comments on the EIS specifically requested noise contours be provided to establish operational noise levels for residential receivers from Sunnyholt Road to the highest location above sea level along Anthony Street, covering an assessment radius of around 700 metres from the eastern site boundary. However, the ANIA has not provided noise contours east of Charles Street (see Figure 1).<br>5) Further to this, the additional background noise data across the Blacktown catchment area requested by the Department in 2020 is also missing in the ANIA. Unless the most affected receiver and the subject site are setback from the road at comparable distances and similar sound propagation conditions, background noise monitoring near Sunnyholt Road must be avoided as background noise levels measured near Sunnyholt Road can be much higher than a location that is situated further away fronting local streets.<br>6) It is evident from the noise monitoring results collected at the side yard of 2 Anthony Street and front yard of 187 Sunnyholt Road that rating background noise levels are highly sensitive to a range of physical factors (see above list) for which the measured levels were found up to 10 dB lower at the location with no direct line-of-sight to Sunnyholt Road.<br>The Department requires additional background noise monitoring data be provided at a representative location along Anthony Street, east of 16 Anthony Street, Blacktown.<br>In addition, operational noise contours must be updated to include all residential receivers from Sunnyholt Road to the highest location above sea level along Anthony Street, covering an assessment radius of no less than 700 metres from the eastern site boundary. | 5. & 6. Noted. Additional background noise data has been obtained and is set out in the Noise report at Annexure B.<br>The additional noise report at Annexure B includes those additional requests of the Department being<br>(a) additional background noise data, and<br>(b) Operational noise contours have been updated |
| According to the NPfI, the background noise levels to be measured are those that are present at the time of the assessment and without the subject development operating (i.e. excluding the noise source under investigation). The Department notes it is unclear how the ANIA has undertaken sufficient noise monitoring and analysis to ensure the assessment of intrusiveness noise levels is accurate and | The Noise report has been updated to include<br>1. Details of attended noise monitoring. Specifically for location L1 (187 Sunnyholt Road, Blacktown), from multiple visits in the past for compliance |

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| consistent with EPA guidelines. The Department requires the ANIA be updated to include details of attended noise monitoring, including contemporaneous notes and estimate of site contribution, to justify the selection of unattended noise monitoring locations for establishing rating background levels in the surrounding residential suburbs. | testing it was found that the subject site is generally inaudible at this location due to the traffic noise from Sunnyholt Road.<br>For the other locations, the noise monitors were strategically placed behind solid fences and buildings in order to shield any noise from the subject site and the industrial area as a whole. Noise from Sunnyholt Road was also shielded. The placement of the noise monitors resulted in conservative background noise levels.<br>Details on the appropriateness of the noise monitoring locations selected is documented in Section 4 of the Revised Addendum Noise Impact Assessment (Annexure B). |
| The primary means for identifying the noise amenity category for an affected community is how the residential area is zoned in the relevant planning instrument. To supplement the zoning consideration, representative background noise may also be used to guide the selection of amenity category according to the NPfI based on careful judgement of site-specific circumstances and in consultation with the relevant planning and licensing authorities. The Addendum Noise Impact Assessment (ANIA) applied the urban amenity category to all residential properties surrounding the subject site without any justification. Residential areas in Blacktown, Kings Langley, Kings Park and Marayong are largely R2 zoning (low density residential) as can be seen in Figure 2. Suburban noise amenity area would apply across these suburbs based on the guidance established in NPfI, noting that the assessment undertaken as part of SSD-5041 also considered these residential areas as 'suburban'.<br>The Department requires the ANIA be updated to include an assessment of operational noise against the suburban amenity noise levels of LAeq(15min) 53 dB(A), 43 dB(A) and 38 dB(A) respectively for the day, evening and night periods. | The report has been updated and justification of the appropriate noise amenity category for all NCAs has been provided in Section 6.2 of the Revised Addendum Noise Impact Assessment (Annexure B).<br>NCA 1A and NCA 1B are located within a 'R2 – low density residential zone'. However, both NCA1A and NCA 1B meet the NPfI's description of an Urban residential receiver category as the acoustical environment:<br>• is dominated by 'urban hum' or industrial source noise, where urban hum means the aggregate sound of many unidentifiable, mostly traffic and/or industrial related sound sources<br>• has through-traffic with characteristically heavy and continuous traffic flows during peak periods (from Sunnyholt Road)<br>• is located near an industrial district<br>• or has any combination of the above<br>In addition the monitored background noise levels are consistent with the typical existing background noise levels for an Urban residential receiver category:<br>• Daytime RBL >45 dB(A)<br>• Evening RBL >40 dB(A)<br>• Night RBL >35 dB(A)<br>Given the above, NCA 1A and NCA 1B are assessed under the Urban residential receiver category. All other catchments are assessed under the Suburban |
| The ANIA has not considered all relevant receiver types identified in Table 2.2 of the NPfI. For example, the most affected receiver in the B7 Business Park zone has been defined as 'industrial premises' instead of 'commercial premises' for noise assessment purposes (see Figures 1 and 2). The Department notes the cumulative LAeq,period amenity noise level of 70 dB(A) would apply to industrial premises located in an area defined as an industrial zone such as IN1 whereas the | |

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| cumulative LAeq,period amenity noise level of 65 dB(A) would apply to commercial premises in a planning zone that allows for commercial activities.<br><br>The Department requires the noise assessment be updated to include all relevant receiver types. | residential receiver category, including new sub catchments NCA 1C, NCA1D and NCA1E, located further away from Sunnyholt Road<br><br>All relevant receiver types have been included in the report. Receiver R7 to the south which was previously identified as an industrial receiver, has been updated to a commercial receiver. Refer to Section 3 and Section 6.2 of the Revised Addendum Noise Impact Assessment (Annexure B). |
| The ANIA has put forward project noise trigger levels for the night-time shoulder period from 6am to 7am on the basis that the rating background noise levels for night-time period are not representative. The Department notes in situations where operations outside of daytime hours can be justified, appropriate noise level targets must only be applied in consultation with the regulatory and consent authority. In the absence of representative background noise monitoring data at the residential receivers in the vicinity of Anthony Street east of Charles Street and the misapplication of noise amenity category to residential receivers, the Department cannot accept the proposed project noise trigger levels between 6am and 7am for consideration. | Project Noise Trigger Levels<br>Additional noise monitoring was undertaken at 4 additional locations to provide more representative background noise levels. Details of this is presented in Section 4 of the Revised Addendum Noise Impact Assessment (Annexure B).<br>• Fact Sheet B of the NPfI outlines the methods for determining the background noise level of an area. The NPfI also outlines methods for assessing 'shoulder periods' being shorter periods on either side of a standard period, where the standard period noise levels are not well represented.<br>• Fact Sheet A, Section A3 of the NPfI outlines suitable methods to determine the shoulder period background noise level. Nearby arterial roads (Sunnyholt Road and Vardys Road) have increased traffic during the early morning period and existing background noise levels are steadily rising in these early morning hours. This can be seen from noise monitoring graphs in Appendix E of the Revised Addendum Noise Impact Assessment (Annexure B), where at all locations the background noise levels begin steadily increasing between 3:00am and 4:00am and reaches background and ambient noise levels typical of the day time period by 6:00am.<br>Therefore, a shoulder period has been established between 6:00am and 7:00am for the assessment |
| *2. Operational noise survey and modelling* | |
| Noise contours shall be updated to display a single decibel value instead of a range of decibel values for each contour line (see Figure 1). | Noise contours have been updated accordingly. Refer to the Revised Addendum Noise Impact Assessment (Annexure B). |

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| The RTS claims the ANIA included updated sound power levels based on the results of attended on-site monitoring. However, measurement methodology, activity description, processing rate at the time of measurement and sound pressure level data previously requested by the Department appears to be missing in the ANIA. Therefore, uncertainties in the source emission inputs and assumptions remain an outstanding issue. Specifically, the Department notes it is unclear why the LAeq(15min) sound power levels of 107 dB(A), 107 dB(A) and 105 dB(A) for excavators, front end loaders and material handlers working with scrap metal remain unchanged in the ANIA even though the LAmax(t) maximum sound levels appears to have increased substantially.<br><br>Unless otherwise justified, the Department expects the LAeq(t) noise emission assumptions for material handling activities to be substantially higher than current levels utilised in the ANIA on the basis that excavators sorting and handling solid demolition waste material are said to have sound power levels around 114 dB(A) according to the British Standard BS 5228-1:2009+A1:2014. The Department therefore require the measurement and reporting of environmental noise be carried out in accordance with best-practice, for example, consistent with Australian Standard AS 1055: 2018 Acoustics – Description and measurement of environmental noise. In addition to the measurement methodology, activity description, processing rate at the time of measurement, the following parameters shall be recorded and reported for fluctuating, impulsive or other non-steady sounds:<br><br>(a) percent exceedance noise levels (typically LA1(t), LA10(t), LA90(t) and other as required)<br><br>(b) range of noise levels (LAmax(t) and LAmin(t))<br><br>(c) equivalent continuous sound pressure level (LAeq(t))<br><br>(d) duration of measurement and number of maximum noise events<br><br>(e) how sound pressure level was converted to sound power level, including the setback distance from each noise generating activity to the measurement location<br><br>(f) contemporaneous notes recorded during the attended noise survey identifying how the variety of observed sounds contributed to LAeq(t) and the character/nature of sound. | Additional details of the attended on-site monitoring to obtain the sound power levels is documented in Appendix C of the Revised Addendum Noise Impact Assessment (Annexure B).<br><br>Measurements of the noise source levels from the key noise generating activities were undertaken with a sufficient duration to capture the total activity noise level (i.e. metal processing activity, pass-by, etc), and relevant statistical measurement parameters ($L_{Amax}$, $LA_{eq,T}$, $L_{A90,T,}$ $L_{Amin}$) were recorded. For the trucks moving onsite, maximum pass-by noise levels were used to derive conservatively high sound power levels for the assessment.<br><br>The attended noise measurement results listed in Appendix C of Annexure B, provide a comprehensive justification of the sound power levels. In terms of<br><br>The measurements in presented in Appendix C justify the sound power levels presented in the Air Noise Impact Assessment.<br><br>The items listed in (a)-(f) have been appropriately addressed, i.e a range of parameters have been used that provide a thorough assessment of the noise generated from material handling activities. Details on measurement durations, setback distances, as well as contemporaneous notes identifying observed sound have been included in Appendix C of Annexure B. |
| Following the exhibition period, Blacktown Council indicated in its submission that recent aerial view of the subject site showed more than seven trucks on the premises at one time, In response, the RTS noted it is anticipated that only seven | The truck path is a one-way path and there are negligible reversing events on site. The trucks were conservatively modelled by applying the sound power level of a truck movement across the entire truck path with no time/speed correction. As the |

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| trucks would complete the full range of on-site activities within a 15-minute period, including tipping and loading, and that additional vehicles on the site would be stacked. The Department notes that up to 16 trucks can be observed on the subject site at the same time as can be seen in Figure 3 and only four trucks appear to be stacked along the site entrance. Further to note is the operational noise impact assessments submitted as part of the EIS and RTS only considered seven trucks travelling in and out of the site at an unspecified speed, and does not appear to have included incidental noise from stationary trucks being loaded or tipping material nor the full range of heavy vehicle manoeuvres that would be performed such as idling and reversing.<br><br>The Department therefore require the worst-case emission scenario (comprising multiple noise generating activities occurring at the same time) be identified in the ANIA and how noise would be generated described. In addition, source emission levels shall be reported as follows and all sources must be mapped visually:<br>• sound power level for point sources<br>• sound power level per metre for line sources<br>• sound power level per square metre for area sources. | trucks were modelled as constantly moving, this would be more conservative than introducing idling periods.<br><br>For mobile plant items, these were modelled as area sources operating within the operational area of the fixed plant that each mobile plant item is supporting. Mobile plant were assumed to operate continuously with no time/speed correction and the sound power was assigned over the entire area source.<br><br>Sources have been mapped visually in Appendix D of the Revised Addendum Noise Impact Assessment (Annexure B).<br><br>The report is made on a worst case emission basis and source emission levels are reported as requested follows:<br>• Sound power level for point sources in Section 7.1<br>• Truck line sources were modelled with no time correction so the sound power level was applied over the entire line source. Sound power level per meter for cars have been presented. Refer to presented sound power level in Section 7.1<br>• Sound power level for area sources. was applied over the entire area source. Refer to presented sound power level in Section 7.1 |
| The EPA in its submission requested the Applicant to detail, explain and justify the method used to determine “neutral condition” and “prevailing wind conditions” using the ISO 9613-2 standard and update the nominated “soft” ground to a more suitable ground type. In response, the RTS noted the ISO 9613-2 standard already incorporates a mild downwind noise enhancing condition and the ground type between the source and receiver has been updated to “hard”. The Department recognises the ISO 9613-2 standard generally predicts the A-weighted sound level under downwind propagation or, equivalently, propagation under a well-developed moderate ground-based temperature inversion. However, the Standard further states that "inversion conditions over water surfaces are not covered and may result in higher sound pressure levels than predicted from this part of ISO 9613". Section 7.3 of ISO-9613-2 further associates water with other acoustically hard surfaces | Model Validation<br>A validation exercise has been undertaken and has considered predictions using both ISO 9613 and CONCAWE algorithms, with the CONCAWE algorithm being selected for this assessment. Details of additional validation measurements and the process of selecting the appropriate algorithm is documented in Section 7.2 of the Revised Addendum Noise Impact Assessment (Annexure B). |

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| such as paving, ice, concrete and all other ground surfaces having a low porosity. Tamped ground, for example, as often occurs around industrial sites can be considered acoustically hard. As such, it remains unclear how EPA's request regarding the use and selection of noise calculation procedure has been addressed.<br><br>The Department requires the use of any calculation procedure and settings be justified according to the circumstances of this particular locality and evidence of validation be provided. Please address model validation by comparing calculated and measured noise levels in close proximity to the site and at some key residential locations. | |
| *3. Intrusive noise characteristics and noise mitigation measures* | |
| The Department notes it is crucial for the ANIA to recognise key issues raised by the public and local businesses, establish how noise would be generated by the development proposal and how noise concerns would be addressed. Repeated impact/impulsive noise and beeping noise have been cited by the public as sources of noise concern. However, the RTS and its ANIA simply considered a qualitative assessment to support the exclusion of these intrusive noise characteristics in the operational noise assessment. It is established in the NPfI and the Australian Standard (AS 1055:2018) on the description and measurement of environmental noise that noise with intrusive characteristics such as tonality, prominent impulses and/or intermittency is more annoying than continuous types of noise (without these intrusive characteristics) with the same equivalent sound pressure level.<br><br>The Department therefore require noise monitoring records to demonstrate these intrusive noise characteristics can indeed be excluded. In the absence of quantitative evidence to demonstrate intrusive noise characteristics are effectively minimised, the Department requires the maximum adjustment of +10 dB for annoying noise characteristics be added to predicted noise levels at all sensitive receiver. | An objective assessment of modifying factor adjustments outlined in the NPfI, Fact Sheet C has been documented in Section 7.2 of the report. It was determined that it is not necessary to apply modification factors to correct for annoying noise characteristics. Notwithstanding this, it should be noted that the Applicant take seriously the community concerns and consideration of all feasible and reasonable mitigation measures to reduce impact noise is documented in Section 7.3 of the Revised Addendum Noise Impact Assessment (Annexure B). |
| In response to public submissions, the RTS committed to raising the existing south-eastern noise wall by 2.2 metres to provide additional screening to sensitive receivers to the east of the subject site. However, it is unclear whether the proposed upgrade to this existing noise wall would be effective at reducing operational noise levels.<br><br>The Department requires the anticipated insertion loss of all proposed noise path controls (i.e. the reduction in noise level at a given location due to the placement of an attenuator in the sound path between the sound source and that location) be clearly specified in the noise impact assessment. See Table 3.1 of the NPfI which shows an example of 'feasible and reasonable' mitigation decision-making matrix for inclusion within an environmental noise impact assessment. In addition, the | **Upgrade to Fence barrier**<br><br>Consideration of feasible and reasonable mitigation measures is documented in Section 7.3 of the Revised Addendum Noise Impact Assessment (Annexure B). A mitigation decision-making matrix is presented in Table 7.6, which documents the consideration process for potential mitigation measures, including the operational effectiveness, feasibility and reasonableness of implementation.<br><br>Raising the height of the existing eastern boundary barrier from 8m to 16m in height, was found to be a feasible and reasonable option, with an expected noise reduction |

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| Department further notes the NPfI advises the choice of noise-control measures depends on both the degree of mitigation required and the undesirable characteristics of the noise source that need to be controlled. For metal works, noise mitigation measures can include the use of efficient enclosures to reduce the impact of impulsive noise. Accordingly, the mitigation decision-making matrix must identify the effectiveness of each noise control at minimising specific intrusive noise characteristics such as impulsiveness and intermittency. | benefit of up to 4dB(A) for residential receivers to the east. The height of 16m was determined through an iterative modelling process in order to find the optimal height. |

## Blacktown City Council

| Comment | Response |
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| **1. Environmental health comments** | |
| a. Council continues to receive noise complaints from surrounding residents regarding the current facility operation, as evident from the listed complaints below:<br>• 14/05/2021 Noise (banging and dust)<br>• 23/7/2020 Scrap metal yard abnormally noisy throughout the day for 2 days starting at 7am<br>• 26/6/2020 Loud vibrating sound for 30 mins during afternoon and sometimes around 8pm<br>• 25/6/2020 Loud day and night<br>• 14/4/2020 Loud thumping noise from scrap metal 24/7 10pm to 3am<br>• 19/8/2019 Very loud banging<br>• 16/8/2019 Loud night noise<br>• 12/6/2019 Loud noise 11pm to 5am<br>It is our concern that the proposed expansion will only exacerbate the current noise issues.<br>The following is requested for further assessment: | (a) The subject site currently has an Noise Management Plan in place which includes a noise complaint handling procedure (Annexure H)<br>(b) Compliance testing reports prepared by Renzo Tonin & Associates to date have concluded that the current operation complies with current noise conditions of consent. |

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| (a) Noise Management Plan (including a noise complaint handling procedure and 24/7 reporting requirements)<br>(b) Further detailed noise assessment to ascertain if the current operation complies with the current regulation. | |
| b. The additional Air Quality Impact Assessment notes the following:<br>"…the annual average concentration of PM2.5 in 2018 was 8.5 µg·m-3 exceeding the criteria at all receivers without the Proposal. The additional contribution from the Proposal at all receivers is less than 0.1 µg·m-3 and is considered negligible."<br>We remain concerned that the proposed expansion will exacerbate the air quality and requires confirmation from NSW Health that the proposed 0.1 µg·m-3 further exceedance will be negligible. Until a confirmation from NSW Health is received, we cannot support the proposal in this instance. | The values of "<0.1 ug.m-3" presented in the AQIA the limit of reporting, and as such represent the upper bound of that value (that is, the value predicted is less than this "less than" concentration).<br>The underlying premise of that limit is that an increment of <0.1 ug.m-3 is essentially a predicted unmeasurable concentration change. A concentration of 0.1 ug.m-3 is essentially the resolution limit of PM2.5 analysis in the field.<br>Any study that assesses PM2.5 would present such predicted minimal impact results as an upper limit of limit of reporting rather than "0 ug.m-3" which cannot be scientifically justified.<br>The position adopted by Council that an increase of <0.1 ug.m-3 is unacceptable essentially implies that any study that assesses PM2.5, and demonstrates a predicted minimal increment, would be unsupportable. It is therefore the position of the applicant that this position imposes a barrier to any development that has assessed PM2.5 and is therefore unreasonable.<br>Furthermore, as outlined by NSW EPA in the Approved Methods document (NSW EPA, 2016, section 5.1.3, page 17):<br>*5.1.3 Dealing with elevated background concentrations*<br>*In some locations, existing ambient air pollutant concentrations may exceed the impact assessment criteria from time to time. In such circumstances, a licensee must demonstrate that no additional exceedances of the impact assessment criteria will occur as a result of the proposed activity and that best management practices will be implemented to minimise emissions of air pollutants as far as is practical*<br>Requesting NSW Health to confirm a negligible increase is not regarded as necessary, given the justification provided above.<br>The Revised Air Quality Impact Assessment (Annexure A) provides a detailed assessment of best management practice measures to be implemented at the site, and the report therefore meets the requirements of the NSW EPA guidance. |

## Environment, Energy and Science Group (EES)

| Comment | Response |
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| *Flood Risk Management* | |
| The Response to Submissions (RtS) report dated 2 August 2021 has not addressed the following<br><br>EES comments previously provided during the public exhibition of the application:<br><br>(a) EES highlights that, the flood impact and risk assessment should adequately outline existing flood behaviour for the full range of flooding up to the Probable Maximum Flood (PMF).<br><br>ARCADIS's assessment is limited to the 1% AEP.<br><br>The RtS states 'it is very unlikely that the PMF flood regime would be sensitive to the additional flood model refinement undertaken for the EIS assessment'.<br><br>(b) The RtS response has not addressed the above comment. The flood assessment should provide a sound understanding of<br>I. the flood behaviour for the full range of flooding up to and including the PMF.<br>II. Addressing the full range of flooding is prudent to guide decisions on this proposal. | The comment in the RTS that "it is very unlikely that the PMF flood regime would be sensitive to the additional flood model refinement undertaken for the EIS assessment" still stands. Therefore the modelling undertaken by Blacktown City Council (Eastern Creek Hydraulic Assessment) provides an accurate indication of the behaviour of the PMF event at the site. To more directly answer the comment, the outcomes of the Council modelling of the PMF event are summarised below:<br><br>• Most of the site would be inundated<br>• Flood depths would be below 1m over almost all of the site, with the majority being below 0.5m<br>• Flood velocities would predominantly be below 0.5m per second<br>• The majority of the site would be subject to low hazard<br>• Some high hazard areas occur in the south-western portion and northern portions of the site.<br><br>It is reiterated that the proposal would not alter existing flood behaviour.<br><br>Mitigation measure 5A in the EIS (Early Warning Flood Readiness Plan) is considered to be an appropriate mechanism for managing flood safety for workers and visitors for events up to the PMF. Refer to the response below regarding additional consultation in relation to this. |
| 2. The Eastern Creek Hydraulic Assessment (CSS, 2014) shows the site is largely inundated in the PMF event and classified high hazard. Accordingly, consideration should be given to the emergency management of the site during rarer events up to the PMF to ensure the safety of the workers and users of the site.<br><br>The RtS states in Section 6 'Flood response on the Proposal Site will be undertaken in accordance with the Early Warning Flood Readiness Plan (as part of the Emergency Response Plan)'.<br><br>EES acknowledges the RtS response. | In addition to the requirements of mitigation measure 5A (which relate to the Early Warning Flood Readiness Plan) Sell & Parker have consulted with the State Emergency Service and confirm the current Plan is adequate.<br><br>A key component of the current Early Warning Flood Readiness Plan is the provision for evacuation, which would be triggered by early flood warning communication on site. Evacuation procedures would be the same for any large flood event including the PMF. It is noted that the proposal would not change the current flooding pattern and therefore would not adversely impact the emergency management response of the existing community. |

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| However, EES highlights that consultation with the State Emergency Service (SES) is essential to ensure that the proposed Early Warning Flood Readiness Plan is adequate and feasible to implement to ensure the safety of the workers and users of the site.<br><br>Moreover, ARCADIS's assessment should include adequate information related to the flood constraints and the emergency response for events larger than the design flood event (i.e. for the full range of flooding up to and including the PMF). This is to ensure that the proposal will not adversely impact the emergency management response of the existing community. | |

## NSW Environment Protection Authority

| Comment | Response |
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| 1. The prevailing noise environment for receivers in NCA 1B at an appropriate location further removed from Sunnyholt Road than 2 Anthony Street Blacktown; | Additional long term noise monitoring has been undertaken to further breakdown NCA1B into sub catchments. This is documented in Section 3 and 4 of the report. |
| 2.<br><br>(a) Identification of the continuous noise source as indicated by the night-time levels at 1 Comorta Close and<br><br>(b) a determination as to whether it is representative of the greater catchment; | (a) Review of the night time (10:00pm to 7:00am) audio recordings at 1 Camorta Cl revealed the predominant noise experienced at this location are from the distant traffic noise from Sunnyholt Road and bird noise. No continuous noise sources from the industrial area was recorded. Our recent noise survey included attended measurements at this location and an inspection of the facilities along the northern boundary of the industrial area did not identify any mechanical plant that would be operational at night.<br><br>(b) Long term noise monitoring was undertaken at a receiver further north on Camorta Close and not adjacent to the industrial area. Monitoring data for this location was used as the representative data for residential receivers to the north. Refer to Section 4 of the Revised Addendum Noise Impact Assessment (Annexure B). |

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| 3. Justification for the adoption of the residential noise amenity area for those areas zoned R2 | NCA 1A and NCA 1B are located within a 'R2 – low density residential zone'. However, both NCA1A and NCA 1B meet the NPfI's description of an Urban residential receiver category as the acoustical environment:<br>• is dominated by 'urban hum' or industrial source noise, where urban hum means the aggregate sound of many unidentifiable, mostly traffic and/or industrial related sound sources<br>• has through-traffic with characteristically heavy and continuous traffic flows during peak periods (from Sunnyholt Road)<br>• is located near an industrial district<br>• or has any combination of the above<br>In addition the monitored background noise levels are consistent with the typical existing background noise levels for an Urban residential receiver category:<br>• Daytime RBL >45 dB(A)<br>• Evening RBL >40 dB(A)<br>• Night RBL >35 dB(A)<br>Given the above, NCA 1A and NCA 1B will be assessed under the Urban residential receiver category. All other catchments will be assessed under the Suburban residential receiver category, including new sub catchments NCA 1C, NCA1D and NCA1E, located further away from Sunnyholt Road. |
| 4. Indicate what wind speeds were used in the assessment; | For prevailing winds, a windspeed of 3 m/s was used and for temperature inversions with prevailing winds, a wind speed of 2 m/s was used. Refer to Section 5.1 of the Revised Addendum Noise Impact Assessment (Annexure B). |
| 5. An objective assessment of modifying factor adjustments outlined in the Noise Policy for Industry - Fact Sheet C, including<br>(a) consideration of feasible and reasonable mitigation to eliminate or mitigate identified annoying characteristics; and | An objective assessment of modifying factor adjustments outlined in the NPfI, Fact Sheet C has been documented in Section 7.2 of the report. Consideration of feasible and reasonable mitigation to reduce impact noise is documented in Section 7.3 of the Revised Addendum Noise Impact Assessment (Annexure B). In response to this it is proposed to increase the eastern noise barrier to 16m. |

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| 6. Ensure the LAFmax events are quantified and considered in the assessment. | Additional details of the attended on-site monitoring to obtain the sound power levels including LAFmax events is documented in Appendix C of the Revised Addendum Noise Impact Assessment (Annexure B). |
| **Attachment 1 – Addendum Noise Impact Assessment** | |
| The revised NIA presents the results of additional background monitoring at<br>1. 189 Sunnyholt Road Blacktown (NCA 1A);<br>2. 2 Anthony Street Blacktown (NCA 1B);<br>3. 19 Camorta Close Kings Park (NCA 2); and,<br>4. 1 Chedley Place Marayong (NCA 3).<br>Further justification is required to<br>(a) demonstrate that 2 Anthony Street Blacktown is representative of receivers further east of Sunnyholt Road. For example, moving 100-150m further east may significantly reduce the effect of Sunnyholt Road resulting in potentially reduced RBLs and hence intrusive criteria.<br>(b) The impact assessment should consider the prevailing noise environment for receivers in NCA 1B at a location further removed from Sunnyholt Road.<br>The EPA notes that Anthony Street increases in height further west which may also affect exposure to Sell and Parker operations.<br>1) The night-time levels at 1 Comorta Close appear to be influenced by a continuous noise source as evidenced by the convergence of acoustic descriptors at a level of about 38dB.<br>2) The source needs to be<br>1. identified and<br>2. a determination made<br>as to whether it is representative of the greater catchment | Further justification was conducted through a recent noise survey in November to identify locations which may require additional monitoring for areas located further from Sunnyholt Road.<br>Additional long term noise monitoring has been undertaken to further breakdown NCA1B into sub catchments. This is documented in Section 3 and 4 of the Revised Addendum Noise Impact Assessment (Annexure B).<br>The sub catchments take into account the lower background noise levels for locations further removed from Sunnyholt Road and at higher elevations. There are now 3 sub catchments for receivers along Anthony Street, covering the changes in the noise environment<br>1. Review of the night time (10:00pm to 7:00am) audio recordings at 1 Camorta Cl revealed the predominant noise experienced at this location are from the distant traffic noise from Sunnyholt Road and bird noise.<br>2. No continuous noise sources from the industrial area was recorded. Our recent noise survey included attended measurements at this location and an inspection of the facilities along the northern boundary of the industrial area did not identify any mechanical plant that would be operational at night.<br>Nevertheless, long term noise monitoring was undertaken at a receiver further north on Camorta Close and not adjacent to the industrial area. Monitoring data for this location was used as the representative data for residential receivers to the north. Refer to Section 4 of the Revised Addendum Noise Impact Assessment (Annexure B). |
| The noise monitoring and assessment conducted at 2 Anthony Street Blacktown is unlikely to be representative of receivers further to the east (i.e. NCA 1B) given they are further removed from Sunnyholt Road and at higher elevations thereby potentially increasing the exposure (line of sight) to Sell and Parker. | Additional long term noise monitoring has been undertaken to further breakdown NCA1B into sub catchments. This is documented in Section 3 and 4 of the Revised Addendum Noise Impact Assessment (Annexure B). |

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| | The sub catchments take into account the lower background noise levels for locations further removed from Sunnyholt Road and at higher elevations. There are now 3 sub catchments for receivers along Anthony Street, covering the changes in the noise environment |
| The further assessment of meteorological conditions is noted and accepted.<br><br>Any limits for this development should be required to be met under NPfI noise enhancing meteorological conditions with scalar wind parameters. | Noted |
| See comments above regarding concerns about the background noise monitoring undertaken for NCA 1B and NCA 2.<br><br>Additionally, the project amenity noise level derived in the Supplementary NIA adopts "urban" residential noise amenity area. The zoning of all residential locations is R2 which according to the NPfI, Table 2.3 would attract a "suburban" residential noise amenity area.<br><br>1) <u>The selection of urban needs to be justified.</u> Any justification needs to consider<br>1. ambient noise levels and<br>2. sources, and<br>3. in the case of NCA1B the ambient environment of locations further removed from Sunnyholt Road (i.e. not 2 Anthony Street). | NCA 1A and NCA 1B are located within a 'R2 – low density residential zone'. However, both NCA1A and NCA 1B meet the NPfI's description of an Urban residential receiver category as the acoustical environment:<br><br>• is dominated by 'urban hum' or industrial source noise, where urban hum means the aggregate sound of many unidentifiable, mostly traffic and/or industrial related sound sources<br><br>• has through-traffic with characteristically heavy and continuous traffic flows during peak periods (from Sunnyholt Road)<br><br>• is located near an industrial district<br><br>• or has any combination of the above<br><br>In addition the monitored background noise levels are consistent with the typical existing background noise levels for an Urban residential receiver category:<br><br>• Daytime RBL >45 dB(A)<br><br>• Evening RBL >40 dB(A)<br><br>• Night RBL >35 dB(A)<br><br>Given the above, NCA 1A and NCA 1B will be assessed under the Urban residential receiver category. All other catchments will be assessed under the Suburban residential receiver category, including new sub catchments NCA 1C, NCA1D and NCA1E, located further away from Sunnyholt Road |
| 1) The EPA notes that the ISO9613 prediction methodology has been augmented with CONCAWE meteorological module and is a conservative approach. | A validation exercise has been undertaken and has considered predictions using both ISO 9613 and CONCAWE algorithms, with the CONCAWE algorithm being |

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| 2) The EPA accepts this approach, noting however that in situations where limits above PNTLs are being sought, this approach may not be acceptable.<br>3) The use of hard ground conditions in the model is acknowledged and accepted.<br>4) The supplementary NIA does not indicate what wind speeds were used in the assessment. This needs to be identified. | selected for this assessment. Details of additional validation measurements and the process of selecting the appropriate algorithm is documented in Section 7.2 of the report.<br><br>**Wind Speeds**<br><br>For prevailing winds, a windspeed of 3 m/s was used and for temperature inversions with prevailing winds, a wind speed of 2 m/s was used. Refer to Section 5.1 of the Revised Addendum Noise Impact Assessment (Annexure B). |
| The RtS and Supplementary Noise and Vibration Assessment does an "objective assessment" to demonstrate the modifying factors adjustments are not relevant.<br><br>1) The EPA notes that the assessment of night-time modifying factors does not appear to include activities undertaken during the morning shoulder period. This is required.<br>2) An objective assessment of modifying factor adjustments outlined in the NPfI, Fact Sheet C is required to be undertaken and presented in the noise impacts assessment. This assessment should also include consideration of feasible and reasonable mitigation to eliminate or mitigate and annoying characteristics identified. | 1. An objective assessment of modifying factor adjustments outlined in the NPfI, Fact Sheet C has been documented in Section 7.2 of the report. This assessment includes activities undertaken during the morning shoulder period.<br>2. Consideration of feasible and reasonable mitigation to reduce impact noise is documented in Section 7.3 of the Revised Addendum Noise Impact Assessment (Annexure B). In response to this it is proposed to increase the eastern noise barrier to 16m. |
| The potentially most affected location is not simply the location with the highest noise level from the development under consideration. It is the location that has the greatest impact which is a measure of both the assessment criteria and noise level from the development.<br><br>The EPA's principal area of concern (as outlined above) remains whether<br><br>1) monitoring at 2 Anthony Street is representative of receivers further to the east as the impact of Sunnyholt Road would decrease (i.e. potentially lower RBLs and hence assessment criteria) however similar or higher levels from the development would occur due to increase exposure due to elevation. | Additional long term noise monitoring has been undertaken to further breakdown NCA1B into sub catchments. This is documented in Section 3 and 4 of the Revised Addendum Noise Impact Assessment (Annexure B). The sub catchments take into account the lower background noise levels for locations further removed from Sunnyholt Road and at higher elevations. There are now 3 sub catchments for receivers along Anthony Street, covering the changes in the noise environment |
| The supplementary NIA at s.7.1.1 indicates that LAeq,15min, dB sound power levels consider "typical / routine cycle". The assessment needs to identify<br><br>1) whether sound power levels were adjusted to reflect the plant s operational time over a 15 minute period. If so,<br>2) how does this account for potential for longer operational times with the increased throughput proposed.<br><br>The supplementary NIA at Table 7.2 – '**LAmax Sound power level of proposed activities, dB(A)'** considers Hammer Milling and Metal Shearing under general | Sound power levels were not adjusted for operating times and all plant were assumed to operate continuously and concurrently over a worst case 15minute period<br><br>The worst case 15 minute period already considers the maximum noise that can be generated with all existing plant operating concurrently. There is no proposed new plant introduced. Additional throughput of trucks have been considered in the modelling |

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| operations. However other activities occurring concurrently with these activities have also been mentioned.<br><br>1) What was the cause of the nominated sound power levels and<br>2) how was the causation event identified and quantified?<br>3) How were distances to causation events determined?<br><br>It is essential that the LAFmax events are quantified and considered in the assessment. | Additional details of the attended on-site monitoring to obtain the sound power levels including LAFmax events is documented in Appendix C of the report. The cause of the nominated sound power levels, causation event and distances to events have been presented in Appendix C of the Revised Addendum Noise Impact Assessment (Annexure B). |
| **Air Quality Assessment Information** | |
| The Supplementary Air Quality Assessment (Northstar) provided as Appendix D of the Response to Submissions (Arcadis, August 2021) has re-estimated emissions and remodelled impacts, however, this revised information has only been provided as data tables which have not been clearly explained or cross-referenced.<br><br>As such, the EPA cannot provide detailed comments on<br><br>1. the adequacy of the response or determine if conditions of approval can be provided.<br>2. Further, the Response to submission includes two pieces of information from separate air quality consultants. The two pieces of correspondence provide some conflicting information (i.e. modelled emission rates).<br><br>The EPA recommends the proponent presents a revised AQIA in its entirety that includes all the requested additional information and provides the appropriate context to interpret the new and/or changed information. | A revised AQIA report has been prepared and is included as Annexure A. This is presented as a stand-alone document in its entirety |
| The emissions inventory includes<br><br>1. additional emissions sources and<br>2. changes in control factors and<br>3. assumptions that have not been explained or justified.<br><br>An additional source that was stated to have negligible emissions in the original AQIA is estimated to be a significant source in the Supplementary Air Quality Assessment. | As part of the revised AQIA (Annexure A) a thorough review of the emission estimation has been performed and presents an updated inventory as a standalone assessment, as requested. The revised AQIA includes justification for the assumptions used.<br><br>Each version of the AQIA has included updates reflecting outcomes of internal and external reviews. The change alluded to in this comment was one of those updates. |
| An adequate assessment of cumulative impacts at industrial and commercial receptors. The Response to Submissions has labelled the receptors R10-R19 as fence-line despite the original AQIA identifying them as industrial. | In regard to health impacts associated with air pollutants, the justification of receptor locations commensurate with the associated averaging time is presented in Section 4.1.2.<br><br>For clarification, Appendix D of Annexure A provides a summary of all predicted impacts at all receptor locations. |

| Comment | Response |
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| Although the adequate assessment of industrial and commercial receptors has not been provided, the incremental impacts in the original AQIA are significant at nearby industrial and commercial receptors.<br><br>The original AQIA and Supplementary Air Quality Assessment has not undertaken a detailed and robust benchmarking of all mitigation and management measures against best practice to demonstrate that all reasonable and feasible measures for management of emissions is proposed and that offsite impacts can be managed. | As stated above, the justification of receptor locations commensurate with the associated averaging time is presented in Section 4.1.2 of the revised AQIA and Appendix D provides a summary of all predicted impacts at all receptor locations including those at nearby industrial and commercial receptors.<br><br>Appendix E of the Revised Air Quality Impact Assessment (Annexure A) presents a Best Management Practice assessment of the mitigation and management measures in place, performed in accordance with the relevant guidance (NSW OEH, 2011)<br><br>That Best Management Practice assessment is further discussed in Section 7.3 of the revised AQIA report (Annexure A), which presents a comprehensive summary of air quality management measures. |
| The original AQIA and Supplementary Air Quality Assessment indicates that onsite meteorological and ambient air monitoring is undertaken onsite for day-to-day management of dust control.<br><br>Yet there is no information about the management control measures including reactive measures and the specific triggers and actions to demonstrate that any reactive management measures proposed can manage offsite impacts | The available on-site meteorological and ambient air quality monitoring currently performed on site is discussed in Section 4.4.3 and Section 7.3.6 of the Revised Air Quality Impact Assessment (Annexure A). This provides recommendations for the review and revision of that monitoring capability to provide proactive and reactive air quality management responses to be implemented through the Air Quality Management Plan (Annexure I). |

## Sydney Water

| Comment | Response |
|---|---|
| Sydney Water has no objection to the proposal in principle.<br><br>However, we note there are multiple 525mm branch wastewater mains traversing the site. | Noted |
| Although the proposed development involves no demolition or construction works, Sydney Water understands the proposed position of heavy machinery stacking over and adjacent to the branch main running parallel with the centre north-south property boundary within the site poses potential risks to our assets. | Sell & Parker confirms that this application does not include any proposed demolition or construction works that would have an impact on any Sydney Water assets.<br><br>Sell & Parker have also engaged the services of a Water Servicing Coordinator. Their response is included as Annexure J and replicated in here in this response summary. |

| Comment | Response |
|---|---|
| | Sell & Parker confirm that there will be no 'heavy machinery' stacking over and/or adjacent to the branch main running parallel with the centre north south boundary. There has been no change of operations or layout of the site through this application that would impact Sydney Water assets<br><br>Sydney Water, through the Water Servicing Coordinator's report have been provided with the the Traffic Management Plan prepared by TTPP Transport Planning being Metal Recovery Facility Kings Park, Swept Path Analysis 19m Articulated vehicle Project no. 19237 Drwg No.19237Cad04 dated 17 November 2021, referenced in their supplementary report (Annexure F) (hereinafter for the purposes of this section known as **Traffic Management Plan**) which demonstrates clearly that there is no machinery stacking in those areas indicated or at all. |
| Depending on the pipe condition and results of any assessments, the asset may need to be replaced, remediated and/or reclined. | Sell & Parker provided CCTV as requested by Sydney Water on 2 November 2021. Sydney Water confirmed on 9 November 2021, following review of that footage, that the CCTV video and report does **not** indicate any structural issues with the sewer that that would cause any concern. |
| The proponent will need to engage a WSC and prepare a specialist engineering assessment (SEA) including a temporary asset protection plan to demonstrate how they will protect our infrastructure. The proponent must provide an accompanying completed SEA Checklist. This information should be submitted through the BPA application as part of Section 73 process. | Sell & Parker has engaged a Water Servicing Coordinator and an engineering consultant who have undertaken the SEA assessment. This will be submitted, as requested, through the BPA system as part of any required Section 73 process. |
| Any temporary loading situations also need to be assessed as part of the SEA to demonstrate negligible/acceptable impacts on our assets. | The supplementary traffic responses (Annexure F) and Stockpile Plan (Annexure E, describe a strategy of traffic and thoroughfare only over the 525 dia Sewer asset.<br><br>All loading and unloading is performed remote of the location of Sydney Water assets and as such our conclusion demonstrate negligible/acceptable impacts on the Sydney Water assets.<br><br>Sell & Parker confirm that there will be no change in operational management of the site, including any temporary loading situations, that would impact the Sydney Water assets and this will be addressed in the Water Servicing Coordinator Part 73 response. |
| Considering the size and importance of these branch mains, such loading may not be permissible, and the proponent may need to create exclusion zones for these critical assets to avoid any heavy machinery movements occurring over them. | The Traffic Management Plan and Stockpile Plan, describe a strategy of traffic and thoroughfare only over the 525 dia sewer asset.<br><br>Sell & Parker have confirmed that there is no change in the daily operations and that all loading and unloading is to be performed remote of the location of the asset. |

| Comment | Response |
|---|---|
| | All heavy machinery associated with the loading and unloading also, will also be remote of location the asset.<br><br>A more detailed response will be provided by the WSC as part of the Section 73 response. |
| In addition, pre and post CCTV survey of the pipes that are at risk due to proposed work (despite the asset protection plan) is required to ascertain that our asset integrity is protected during the course of this project. Condition of the sewer needs to be incorporated into the assessment. | There are no works to be undertaken and this will be reflected in the SEA report through the BPA application.<br><br>Further, Sydney Water has indicated in writing on 9 November 2021 that the pipes have been assessed by Sydney Water and that the service condition issues (roots and grease build up) will be dealt with as part of the Sydney Water networks normal ongoing maintenance program.<br><br>The Water Servicing Coordinator will recommend in their response under Section 73, that a post CCTV survey is not required based on their investigation. |
| Geotech investigation should be undertaken as necessary to inform any loading assessment and design/protection measures. | A Geotech investigation has been undertaken and no issues reported. This report will be included in the Water Servicing Coordinator report to be filed as requested by Sydney Water as part of the Section 73 response. |
| All our maintainable assets and structures need 24/7 uninterrupted access for operations and maintenance purposes. | Noted |

# ANNEXURES

Annexure A – Revised Air Quality Impact Assessment

Annexure B - Revised Addendum Noise Impact Assessment

Annexure C – Updated Site Plan

Annexure D – Process Flowchart and Description

Annexure E – Stockpile Plan

Annexure F – Additional Traffic Information

Annexure G – Viewpoints

Annexure H – Noise Management Plan

Annexure I – Air Quality Management Plan

Annexure J – Sydney Water/Water Services Coordinator Correspondence

Annexure K – Building Evacuation Plans

# Annexure A – Revised Air Quality Impact Assessment

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