



4 August 2022

Attention: Carl Dumpleton
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Dear Carl

SSD 7009: Marulan South Limestone Mine Continued Operations Project – Response to DPE RFI on Noise Management Plan

Boral submitted the Noise Management Plan (NMP) in accordance with condition B8 of the development consent on 23 March 2022.

The Department of Planning and Environment (DPE) requested further information prior to approving the NMP. DPE's information requests are in **bold** below followed by Boral's response.

As per condition B4(A) any Construction Noise Protocol is to be prepared in consultation with the EPA and any residents who may be affected by the construction noise generated by these works. Please provide evidence of any consultation in appendix form, for any existing Construction Noise Protocols or confirm you are abiding by the noise criteria in Table 1 for construction activities.

As outlined in section 5.2 of the NMP, the following construction projects will be required to support the operation of the mine:

- Marulan Creek Dam Wall and access track
- Relocation of the Stockpile Reclaim Area
- Road Sales Stockpile and associated intersection
- Re-alignment of a section of Marulan South Road and relocation of HV powerline

None of these construction projects will be undertaken within the first two years of commencement of operations under SSD 7009. Once detailed construction planning has been undertaken and details on the construction methodology and machinery has been determined, Boral's acoustic specialist will determine whether the construction works are likely to exceed the noise criteria in Table 1 of the consent and if so then a Construction Noise Protocol will be developed in accordance with condition B4.

Sections 4.2 and 5.2 of the NMP describes in detail the process that needs to be followed if Boral determine that construction activities have the potential to exceed the operational noise criteria and a Construction Noise Protocol needs to be prepared.

Therefore, in our opinion, the NMP does not require amendment.

As per condition B7(B) Boral is required to implement reasonable and feasible noise attenuation measures on all plant and equipment that will operate in noise sensitive areas. Please provide evidence of the implementation of attenuation measures listed in section 5.1.2 of the management plan.

As outlined in the introductory part of section 5.1 of the NMP: "The EIS NIA did not identify any specific noise management measures for the mine to operate within the consent criteria".

Background and attended noise monitoring was conducted during the EIS to inform the operational noise modelling. The conservative noise modelling predicted that the mine would meet operational noise criteria at all receivers without any additional/specific noise management measures.

As a precautionary approach Boral has volunteered to establish a real-time noise monitoring terminal between the mine and the closest receiver R9. This is in addition to the attended noise monitoring required by condition B7 (g). Boral will continuously monitor operational noise from the mine to establish which activities are causing the most noise and if these activities are resulting in noise close to or exceeding the criteria.

Boral already implements a number of noise management/reduction measures on site and will continue to do so. Boral will also continue to investigate ways to reduce noise from noisy activities that are in areas of the mine closer to receivers in particular, as well as implementing those noise management measures outlined in sections 5.1.1 and 5.1.2 of the NMP where reasonable and feasible.

Of those noise controls outlined in section 5.1.2 of the NMP, Boral is already doing the following:

- Select the most effective mufflers, enclosures and low-noise tools and equipment where possible. For example all nine inch angle grinders have been banned from the site.
- Select suitable equipment (dozers, drill rigs) with the lowest possible sound power level emissions. For example Boral has just purchased a brand new dozer and loaders with the latest noise and emissions reduction technology.
- Reduce throttle settings where feasible and turn off equipment and plant when not being used. This is currently practiced on site.
- Regularly inspect and maintain equipment to ensure it is in good working order. There is already a full planned maintenance schedule for all fixed and heavy mobile equipment on site.
- Regular check noise control equipment and devices such as exhaust mufflers, attenuators, enclosures, insulation/cladding and barriers/bunds. Equipment must not be operated until it is maintained or repaired, where maintenance or repair would address the annoying character of noise identified. This is implemented on site.
- Fit for purpose and pre start checks are required on all mobile equipment which includes ensuring effective mufflers and reversing alarms are installed and in good working order. This is conducted at the commencement of every shift.
- For machines with fitted enclosures, check that doors and door seals are in good working order and that the doors close properly against the seals. This is checked in pre-starts and regular maintenance inspections.
- Utilise site topography or structures to shield noise emission sources from local receivers, where practicable. Noise bunds are already planned and implemented along the western edge of the overburden emplacements as they are built to reduce noise at western receivers from heavy machinery working on the emplacements.

The intention of the NMP is to document what noise controls/management measures need to be considered and implemented where reasonable and feasible and required. It is not the intention of the NMP to provide evidence of the implementation of attenuation measures listed in section 5.1.2 of the management plan.

Therefore, it is Boral's opinion that amendments to the NMP are not required.

As per condition B7(C) Boral must take all reasonable steps to minimise the noise impacts of the development in noise sensitive areas during the evening and night. Please clarify the location of the Noise Monitoring Terminal (NMT), given it is stated in section 5.1.6 of the management plan the "NMT is situated between the mine and the nearest receiver, R9", whilst figure 5.1 indicates it is within purple shaded area, the "potential NMT location".

The last sentence of the first paragraph of section 5.1.6 of the NMP states: "The NMT will be installed in proximity to the western Project boundary to provide real time noise monitoring data ()".

The fourth paragraph of section 5.1.6 of the NMP states: "As the NMT is situated between the mine and the nearest receiver, R9, to be representative of the criteria at R9, the NMTL is adjusted to account for the difference in distance between R9, the NMT and the mine noise
Figure 5.1 shows a shaded area to the west of the mine's Western Overburden Emplacement (WOE), between this emplacement and the closest receiver R9.

It is therefore clear in the description in the NMP that the proposed NMT will be located to the west of the mines WOE, between this emplacement and the closest receiver R9, within the shaded area. The reason why there is a shaded area and not one specific point for the location of the NMT is that when overburden emplacement activities are taking place in the north-western part of the WOE then the NMT will be moved to the northern section of the shaded area. When overburden emplacement activities are taking place in the south-western part of the WOE then the NMT will be moved to the southern section of the shaded area.

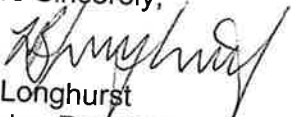
Therefore, we don't believe any amendments are required to the NMP.

As per condition B7(G) Boral must carry out regular attended noise monitoring (at least once a month, unless otherwise agreed by the Planning Secretary). Section 6.3.2 details quarterly monitoring. A separate post approval item (SSD-7009-29) has been submitted requesting a reduction in the frequency of monitoring. Accordingly, this plan cannot be approved until the separate post approval item is determined.

Boral awaits DPE's response to the reduction in the frequency of attended noise monitoring. If agreed to by DPE no amendments are required to the NMP.

Based on our response, we are of the opinion that the NMP does not require amendment. We would like to discuss this further in the management plan status meeting next week.

Yours Sincerely,



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