

DOC17/550337-01; EF14/23995

Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ms Melissa Anderson

By email: melissa.anderson@planning.nsw.gov.au

23 November 2017

Dear Ms Anderson

**Proposed Modification to Northern Coal Logistics Project, Development Consent (SSD 5145) –
Section 96(1A) Modification - Comments from the Environment Protection Authority (EPA)**

I refer to your email to the Environment Protection Authority (EPA) received 6 November 2017, seeking comments on the Centennial Northern Coal Services modification application. The modification is seeking to modify Development Consent for the project by making amendments to the operational noise criteria and air quality criteria, and to increase the number of employees based at the Cooranbong Entry Site (CES).

Noise Criteria

The application for modification seeks to amend the noise criteria listed under condition 2 of Schedule 3 in SSSD-5145, as an administrative update only, with no change to noise emissions, in relation to the receptors identified as 22,23 26 28 and 32 (residential premises). The change proposed is from 35 dB(A) to 37dB(A) for those receptors across the day, evening and night time periods. This change is to reflect criteria of 37 dB(A) as stipulated in the Secretary's Environmental Assessment Report (August 2015).

This proposed modification appears to be inconsistent with the operational noise modelling in the *Centennial Northern Coal Services Pty Limited - Northern Coal Logistics Project - Environmental Impact Statement*, prepared by SLR Consulting Australia Pty Ltd, 2014. The modelling for the CES in Table 92 showed predicted levels of less than 35 dB(A) across the day, evening and night time periods for the receptors identified as 22,23,26,28 and 32 (see page 341 of EIS below).

The noise levels predicted by SLR (2014d) for this operational scenario are provided in Table 92.

Table 92 - Cooranbong Entry Site Operational Noise

Location	Period ¹	Predicted Noise Level $L_{Aeq(15minute)}$ (dBA)		Project Specific Noise Criteria (dBA)
		Calm	Temperature Inversion	
22	Day	<35	N/A	42
	Evening	<35	N/A	42
	Night	<35	<35	41
23	Day	<35	N/A	42
	Evening	<35	N/A	42
	Night	<35	37	41
26	Day	<35	N/A	42
	Evening	<35	N/A	42
	Night	<35	36	41
28	Day	<35	N/A	42
	Evening	<35	N/A	42
	Night	<35	<35	41
30	Day	<35	N/A	42
	Evening	<35	N/A	42
	Night	<35	<35	41
31	Day	<35	N/A	42
	Evening	<35	N/A	42
	Night	<35	<35	41
32	Day	<35	N/A	42
	Evening	<35	N/A	42
	Night	<35	<35	41

Air Quality Criteria

The modification application also seeks to amend the note associated with the air quality criteria for the 24-hour average PM_{10} listed under condition 7 of Schedule 3 in SSD-5145. (See Table 4 below from the Development consent). The amendment proposed is that the note "a" currently applied to the 24-hour average PM_{10} criterion should be changed to "b", resulting in the criterion being considered incrementally, rather than cumulatively.

Table 4: Air quality criteria

Pollutant	Averaging Period	Criterion	
Particulate matter < 10 μm (PM_{10})	Annual	a,d 30 $\mu g/m^3$	
Particulate matter < 10 μm (PM_{10})	24 hour	a 50 $\mu g/m^3$	
Total suspended particulates (TSP)	Annual	a,d 90 $\mu g/m^3$	
^c Deposited dust	Annual	^b 2 $g/m^2/month$	a,d 4 $g/m^2/month$

Notes to Table 4:

a Cumulative impact (ie increase in concentrations due to the development plus background concentrations due to all other sources).

b Incremental impact (ie increase in concentrations due to the development alone, with zero allowable exceedances of the criteria over the life of the development).

The EPA does not typically set ambient air quality limits, criteria or standards for industrial premises. In the EPA's view, ambient air quality limits are not enforceable, which is why they are not included in Environment Protection Licences (EPL). The EPA focuses its regulatory efforts on controlling emissions at the source. For mines, which generate fugitive dust emissions, this is consistent with Section 128(2) of the *Protection of the Environment Operations Act* (1997), which requires that all practicable means are taken to prevent and minimise air pollution. The EPA reflects this legislative requirement in its standard EPL conditions, requiring that activities occurring at the licenced premises be undertaken in a manner that prevents or minimises dust. The EPA therefore has no comment on the proposed amendment.

Employment

The proponent has noted that the proposed modification to increase the number of employees at the CES from 14 to 60 will create additional light vehicle traffic movements on the local road network, due to increased employee numbers commuting to and from the CES. Any change in noise impacts appear to have not been assessed and therefore the EPA cannot comment on this aspect of the proposal.

If you require any further information regarding this matter please contact Genevieve Lorang on (02) 4908 6809.

Yours sincerely



MITCHELL BENNETT
Head Strategic Programs Unit - Hunter
Environment Protection Authority

Contact officer: GENEVIEVE LORANG
(02) 4908 6869
hunter.region@epa.nsw.gov.au

