



DOC16/429984-04:CK

Planning Officer
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ms Melanie Hollis

Dear Ms Hollis

**Bringelly Brickworks
Greendale Road Bringelly
Modification Application SSD 5684 Mod 1**

I am writing in reply to the Department of Planning and Environment (DPE) request dated 29 August 2016 for the Environment Protection Authority (EPA) to provide comment on a Statement of Environmental Effects for the above proposed modification. The proposed modification involves an increase in the importation of raw materials from 96,000 tonnes per annum (tpa) to 321,000 tpa.

Boral CSR Bricks Pty Ltd (BCB) has stated that:

- The predicted truck movement will not exceed the transportation limits set in the existing Project Approval (SSD_5684). As the traffic noise modelling results reported in the Environmental Impact Statement (EIS) were based on these transportation limits, no additional road traffic noise is anticipated. The limit on the number of inbound and outbound heavy vehicles per hour will also be complied with.
- The proposed modification relates to a threefold increase in raw materials being delivered to the premises, increasing on site raw material storage and vehicular movements on unsealed surfaces. Air quality impacts may include dust and vehicular emissions. The original EIS considered all aspects of the proposed increase in truck movements. No new types of air pollutants or additional air quality impacts greater than those reported in the EIS are predicted.

EPA met with the proponent on 5 September 2016 where the proposal was discussed. The proponent outlined a number of operational measures including the following:

- The premises presently has capacity between current actual truck movements and truck movements allowed via the existing project approval (SSD_5684). Predominantly raw material deliveries will be undertaken by larger capacity truck and trailer vehicles rather than truck only vehicles where possible to minimise truck movements.
- Materials storage locations will be expanded to cope with both incoming raw material as well as on-site quarried material. BCB stated there is sufficient space on site to manage the increase raw materials to be imported.
- BCB has undertaken some community consultation via the BCB Community Consultation Committee.

On the basis of a review of the information provided, the EPA provides the following comments to assist DPE in the assessment and determination of this modification application:

1. The BCB premises is regulated by the EPA under Environment Protection Licence (EPL) Number 1808. BCB must ensure compliance with EPL 1808 and the *Protection of the Environment Operations Act 1997* (and any associated regulations) at all times.
2. The existing project approval contains several conditions to regulate noise and air pollution from the premises.
 - a. In regards to noise this includes hours of operation, noise criteria, noise controls (including a bund) and a Noise Management Plan. Unless otherwise agreed to by the Secretary it includes quarterly attended monitoring. Table 2 of Condition 2 states "*brick making*" as an activity. DPE should ensure this activity includes deliveries of raw materials.
 - b. In regards to air quality this includes Air Quality Criteria and an Air Quality Management Plan. The proponent has not requested a modification to these requirements. Various requirements under the existing approval, for example, management plans will be required to be reviewed.
3. The existing project approval includes a requirement for an independent audit within one year of issuing (and then every three years). The consent was issued on 3 March 2015. It also includes an Annual Review of Environmental Performance. The findings of this audit, Annual Reviews and any quarterly attended noise monitoring should be used to help inform the determination of this modification. This includes assessing the current level of compliance and any measures/actions to improve environmental performance.
4. Unless otherwise addressed under existing project approval, a Noise Verification Report and Air Quality Verification Report should be prepared, if the modification is approved. These reports should confirm the findings of the original EIS (including the Noise Impact Assessment and Air Quality Impact Assessments). These requirements should be prepared in consultation with the EPA.
5. The existing project approval requires the preparation of an Air Quality Management Plan, which includes an Air Quality Monitoring Program. BCB should undertake air quality monitoring for fine particulates (for example, PM10). This should be based on continuous real time monitoring. This monitoring could be used to verify compliance with consent and licence requirements. It can also be used as a management tool to help BCB control air emissions, and inform 'Trigger Action Response Plans' when dust levels are above pre-determined levels.
6. The existing project approval requires a Transport Management Plan. This plan should also include, but not be limited to, details of:
 - a. driver traffic awareness to minimise noise, particularly from reversing alarms and compression braking
 - b. a regular Truck Noise Auditing Program (including testing and reporting requirements)
 - c. identify, consider and implement feasible and reasonable management strategies to achieve best-practice noise and air emissions standards for vehicle movements associated with the Development. Diesel exhaust emissions are a major source of fine particle pollution. Where feasible, both on-road and off-road vehicles servicing the BCB premises should be fitted with best available diesel control technology.

Should you have any further enquiries, please contact Mr Chris Kelly on 4224 4100.

Yours sincerely

William Dove 21 September 2016
WILLIAM DOVE
Unit Head Regulation

Contact officer: CHRIS KELLY
 4224 4100