



Our reference: : DOC15/378423-08; SF14/12226  
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Date : 15 October 2015

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SYDNEY NSW 2001

Email: [roseanne.hawkeswood@planning.nsw.gov.au](mailto:roseanne.hawkeswood@planning.nsw.gov.au)

Dear Ms Hawkeswood,

**RE: NARRABRI COAL PROJECT MP MODIFICATION 5 (08\_0144 Mod 5)**

I refer to the modification application for the Narrabri Coal Mine (08\_0144 MOD 5) referred to the NSW Environment Protection Authority (EPA) on 24 September 2015 for its review and comment further to the public exhibition of the environmental assessment (EA). The EPA has reviewed the EA and provides the following comments for DPE's consideration in determining this matter.

**Noise**

The noise assessment by Wilkinson Murray Pty Limited (2015) provides insufficient information about the project. The EPA recommends that additional information be provided to allow the EPA to undertake a complete assessment of the proposal.

Narrabri Coal Mine holds Environment Protection Licence (EPL) 12789, which specifies noise limits, the meteorological conditions under which the noise limits apply, and that the relevant meteorological conditions are those measured at a meteorological station "W1", which is shown in Figure 2-1 of the Noise Impact Assessment (NIA).

The NIA states in Table 2-2 that noise limits were exceeded at "Oakleigh" on one occasion in June 2015 and two occasions in mid July 2015. A footnote to Table 2-2 indicates that the temperature inversion conditions were unknown for the two occasions in mid-July. The EPA understands that this was because the consultant who undertook the attended noise monitoring did not deploy temperature loggers at the time of recording, hence the presence of inversion conditions could not be confirmed.

Condition O2 of EPL 12789 requires the licensee to maintain and operate all installed plant and equipment in a proper and efficient manner.

**Additional information sought:** Further explanation as to why was the meteorological station "W1" not used at the times of the mid July 2015 noise monitoring and what measures has the proponent taken to ensure that it will be operating in the future so that compliance with noise limits can be ascertained?

The NIA predicts a noise level of 31dBA<sub>L<sub>Aeq,15min</sub></sub> for "Oakleigh" under 4degC/100m (F stability class) conditions. I understand that the 40dBA was measured on the occasions in June and July 2015 that the

limits were exceeded at "Oakleigh". The NIA states that the meteorological conditions were not known in July, however, in June the meteorological conditions were such that the level should not have exceeded 31dBA. This suggests that the noise levels for the Mod 5 proposal are under-predicted.

**Additional information sought:** The proponent needs to provide updated noise predictions that align with monitored levels, or a satisfactory explanation as to why noise levels have not been under-predicted.

The NIA does not discuss the application of EPL Condition L3.6 which relates to the application of modification factors in Section 4 of the NSW Industrial Noise Policy. The proponent needs to include in the NIA a discussion about the application of EPL Condition L3.6.

Section 2.4.1 of the NIA states that the noise limits were exceeded at "Oakleigh" because all four dozers were operating on the ROM and product coal stockpile, which were near maximum size. Narrabri Coal Mine's Mod 5 proposal is essentially for an increase in approved production from 8MTpa to 11MTpa, to be realised through no additional plant or equipment but increased utilisation of the existing equipment.

**Additional information sought:** The proponent needs to revise the NIA for all four dozers operating on the ROM and product coal stockpile more frequently, with coincident noise levels of 40dBA at "Oakleigh", or provide a satisfactory explanation as to why this will not occur.

It is noted that Table 3-1 indicates that the properties "Ardmona" and "Haylin View" are both predicted to receive impacts of 35dBA in both scenarios 1 and 2. It is noted that as part of the Spectrum Acoustics Noise Model Validation Report of November 2013, that "Ardmona" was predicted (bulldozer second gear) to receive impacts of 38dBA and "Haylin View" of 37dBA.

**Additional information sought:** The proponent needs to address the discrepancies between the predicted impacts of the 2013 Noise Model Validation Report and the NIA.

On receipt of the above information, the EPA should be able to provide recommended conditions of approval for your consideration.

Please contact Kharl Turnbull on (02) 6773 7000 if you wish to discuss this matter.

Yours sincerely



**REBECCA SCRIVENER**  
**Acting Head, Regional Operations Unit - Armidale**  
**Environment Protection Authority**