



Our reference: EF13/4989: DOC13/31336
Contact: Michael Heinze 02 6229 7002

Mike Young
Manager – Mining Projects
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attn: Jessie Giblett

8 August 2013

Dear Mr Young

**Re: Ardmore Park Quarry Modification (MP07_0155 Mod 2)
Exhibition of Environmental Assessment**

I refer to your letter of 26 June 2013 inviting the Environment Protection Authority (EPA) to comment on a draft proposal to modify the project approval (MP07_0155) for the Ardmore Park Quarry at Bungonia. The draft proposal seeks to utilise local roads to deliver up to 20,000 tonnes of product from the quarry to local customers.

The EPA's role is to regulate the environmental aspects of the Ardmore Park Quarry site and it is our understanding that the proposed modification will not affect activities within the site itself. The proposed modification to utilise local roads for the transport of limited amounts of quarried product is not an activity which the EPA regulates.

Despite this, we do wish to make comment on the application of EPA policies to the assessment of noise and vibration in Chapter 5.3 of the document *Ardmore Park Quarry via Bungonia, NSW Environmental Assessment to support a S75W Modification of PA 07_015* ("the report").

Road Noise Assessment

The original Director-General's Requirements (DGRs) for the Environmental Assessment were issued for MP07_0155 on 23 January 2008. These DGRs identified the EPA's *Environmental Criteria for Road Traffic Noise* (ECRTN) as one of the reference documents under which the noise impacts of the proposal should be assessed. From 1 July 2011, the ECRTN was superseded by the *NSW Road Noise Policy* (RNP) and for all DGRs issued *after* that date the RNP has been the relevant policy by which noise assessments are conducted. For DGRs issued prior to 1 July 2011, the use of the ECRTN is still acceptable and applies to MP07_0155, but the proponents are not prohibited from using the RNP if desired.

The EPA's concern lies in the intermingling of aspects of the ECRTN and RNP in the report. The report identifies the RNP as the policy under which the noise and vibration impact assessment was conducted, however the ECRTN's reference to an external to internal noise adjustment of 10dB(A) has been applied to justify the acceptability of noise levels modelled under the RNP for the Windellama Primary School (page A4-6 of the report). It is unusual to apply components of a superseded policy for an assessment conducted under a current policy and the EPA does not support such a methodology.

Despite these reservations, and considering the RNP does not contain a 10 dB(A) interior/exterior adjustment similar to the ECRTN, it is generally accepted that such a reduction between external and internal sound levels is a reasonable assumption. In light of this, the predicted external noise level of 46dB(A) outside Windellama Primary School classrooms is considered acceptable and would achieve compliance with the requirements of the RNP.

If you have any questions, or wish to discuss this matter further please contact me or Michael Heinze on Ph: 02 6229 7002.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. Thompson', with a long horizontal stroke extending to the right.

JULIAN THOMPSON
Unit Head – South East Region
NSW Environment Protection Authority