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EPA Advice on Revised Noise Impact Assessment – MP06_0228-Mod-19

Dear Mr Williams

Thank you for your correspondence of 2 December 2020 requesting advice from the NSW Environment Protection Authority (EPA) regarding the Revised Noise Impact Assessment (Revised NIA) for the proposed Ethanol Distillery Plant Upgrade (Mod 19) (MP06_0228-Mod-19) at Shoalhaven Starches, located at 160 Bolong Road, Bomaderry NSW.

The EPA has reviewed the following documents:

- *Revised Noise Impact Assessment for Mod 19* - Harwood Acoustics - ref: 2007001E-R - 1 December 2020
- *Shoalhaven Starches Mod 19 Additional Information Request Response* - Harwood Acoustics - ref: 2007001e-l.docx - 1 December 2020

The revised NIA has been prepared in response to EPA's previous advice regarding Mod 19 and sent to the Department of Planning, Industry and Environment (DPIE) on 29 October 2020. The EPA's advice outlined a number of issues and requested the proponent to provide additional information.

The EPA has reviewed the revised NIA and notes that it does not fully address the issues outlined in the EPA's original letter. However, the EPA has determined that the deficiencies in the response can be managed through the EPL and the development consent, if Mod 19 is approved.

Attachment A contains the EPA's advice and comments on the revised NIA, for DPIE's consideration.

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If you have any questions about this advice, please contact myself or Amanda Fletcher on (02) 6229 7002 or via email at queanbeyan@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Janine', with a long horizontal stroke extending to the right.

14/12/2020

JANINE GOODWIN
Unit Head Regulatory Operations
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Attachment A

1. Matters to be addressed with conditions

a. Compliance assessment to be conducted post-operation of the modified plant

The EPA recommends that any conditions for the modification, if approved, require the proponent to conduct a compliance noise assessment post-operation of the modified plant that confirms the cumulative noise level from the modified plant and the existing plant does not exceed the noise limits for the entire premises. If exceedances of the noise limits are identified, the compliance report should identify feasible and reasonable noise mitigation measures, together with timeframes for implementation to achieve compliance.

The proposed condition will ensure that the operation of the modification in conjunction with the existing operation, will not result in an exceedance of the premises-wide noise limits, inclusive of any applicable meteorological conditions and corrections for annoying characteristics.

b. Construction works to be limited to standard construction hours

The EPA recommends that any construction works associated with the proposed modification be limited to standard construction hours, as per the Interim Construction Noise Guideline.

2. Minor matters

a. Post-operation compliance noise assessment to be conducted in accordance with the Noise Policy for Industry

The EPA recommends that a post-operation compliance assessment will be conducted in accordance with the Noise Policy for Industry.

The revised NIA includes a more detailed assessment of annoying characteristics such as low frequency noise, in response to EPA's comments. Table 7 of the revised NIA shows 'measured sound pressure levels' as dBA and dBC to determine if there is a greater than 15 dB difference, in accordance with the Noise Policy for Industry (NPfI).

However, Section 4.2.3 states that these levels were measured 'in close proximity to the plant'. This is not in accordance with the Npfi, which states that measurements should be made at the locations nominated in the EPL (note to Table C2). The Npfi clearly states in Fact Sheet C that 'the modifying factor corrections should be applied having regard to the contribution noise level from the premises when assessed/measured at a receiver location'. The assessment/measurement should not be made in close proximity to the plant.

b. Noise impact assessments to assess impact under temperature inversions

The EPA recommends that future noise impact assessments assess the potential noise impact under worst-case weather conditions.

The EPA considers that the response to the EPA's comment regarding noise enhancing meteorological conditions has not been adequately addressed in Section 4.2.1 of the revised NIA.

The existing noise limits in the EPL apply under noise-enhancing meteorological conditions as defined in the Npfi. The NIA does not, and should, include an assessment of potential noise impact under temperature inversion conditions to ensure compliance during the sensitive night-time period.

The EPA notes that the predicted noise levels are below the design criteria, therefore there is some headroom to allow for some noise enhancement during an inversion condition, if it occurs.