



Your reference :
Our reference : SF19/66698; DOC19/627259
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NSW Department of Planning and Environment
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LIDSDALE SIDING COAL LOADER MODIFICATION 1 – INFRASTRUCTURE UPGRADES

I refer to the email received on 4 July 2019 from the Department of Planning and Environment (the Department) requesting the Environment Protection Authority (EPA) provide comment on the publicly exhibited Environmental Assessment (EA) for the proposed Lidsdale Siding Coal Loader MOD 1 – Infrastructure Upgrades (the proposal).

As requested, the EPA has considered the EA for the Proposal in terms of the potential impact to air quality, noise emissions, surface water and waste management. The EPA considers the conditions of environment protection licence 5129 appropriately address the potential impacts of proposal, aside from noise emissions. The EPA's response regarding the noise impact assessment is contained in Attachment A.

The EPA recommends the Department seek further information and clarification in respect of the matters raised in Attachment A prior to finalising its assessment of the potential impacts of the proposal.

Should you have any further enquiries in relation to this matter please contact me at the Central West (Bathurst) Office of the EPA by telephoning (02) 6333 3803 or email central.west@epa.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Ledger'.

SHERIDAN LEDGER
Unit Head Central West Region
Environment Protection Authority

LIDSDALE SIDING COAL LOADER MODIFICATION 1 – EPA COMMENT

The EPA understands that the modification proposes to modify the consent under Section 4.55(2) of the Environmental Planning and Assessment Act (EP&A Act) to allow the facility to:

- receive and unload one coal-laden train (nominal net tonnage of up to 3,900t per train) each day (Monday to Saturday between 7:00 am-6:00 pm, and Sunday between 8:00 am-6:00 pm); and
- transfer coal received via rail to the overland conveyor for dispatch to the Western Coal Services (WCS).

Noise

In providing comment regarding the noise impacts of the proposal, the EPA has reviewed the following documents:

- Noise report from the 2012 upgrade application - *Centennial Ivanhoe Lidsdale NSW Environmental Noise Impact Assessment for Proposed Lidsdale Siding Upgrade Project, dated 14 August 2012, Hatch, reference: H-338807 Rev. 3* (2012 upgrade noise report)
- Environmental Assessment for the proposed modification - *Lidsdale Siding Environment assessment for modification to development consent 08_0223, dated 25 June 2019, EMM Consulting Pty Ltd reference: J190136 Version v1 Final* (EA Report)
- Noise report for the proposed modification - *Lidsdale Rail Siding modification: Noise assessment, dated 8 May 2019, EMM Consulting Pty Ltd reference: H190123 RP#1 v2-1* (noise report)
- *Centennial Coal Noise Management Plan Western Region, dated June 2018, Centennial Coal Company Limited reference: Revision 3 Final* (NMP)
- Environment Protection Licence (EPL) Number 5129
- *Project Approval Application 08_0223, Lidsdale Siding Upgrade Project, dated 3 May 2013* (Project Approval)

Based on the review of these documents, the EPA has identified a number of issues with the noise report in the EA:

- 1) The noise report has not provided an assessment of noise levels against the EPL noise limits nor the existing Project Approval. The noise report should be updated to assess the predicted noise levels against the requirements of the EPL.
- 2) Predicted noise levels from the proposed operations are above the EPL limits, however the report has not considered additional mitigation measures. Whilst it is understood that noise levels for unloading coal trains may be lower than the loading operations, the predicted levels for the unloading activities are still above the EPL limits. The proponent should identify all reasonable and feasible noise mitigation measures where noise levels are predicted to exceed the EPL limits. If after all reasonable and feasible mitigation measures have been implemented, noise levels remain above the EPL limits, an assessment of residual impacts should be undertaken in accordance with Section 4 of the Noise Policy for Industry (NPfI) (EPA, 2017).
- 3) The existing premises noise emissions in Table 2 of the noise report are inconsistent with the predicted noise levels in the 2012 upgrade noise report. No explanation is provided in the noise report for this discrepancy. The proponent should either provide a justification or update the noise predictions accordingly.
- 4) The site has been operating in its current configuration since 2015, however the noise report has relied on the 2012 upgrade noise report. Since the 2012 upgrade noise report was completed, there have been several assessments of the site, including monthly noise monitoring for 4 years, a noise audit, regional noise modelling for Centennial operations and a sound power level survey. It is considered that these activities would provide a better understanding of the actual noise emissions

compared with the predictive assessment from the 2012 upgrade noise report. The proponent should provide a justification for not appearing to consider this information in the noise report, or the report should be updated in consideration of this information.

- 5) Since the premises is an operating noise source and the proponent has relied on the difference between the existing and proposed operational noise levels to define the impact, the proponent should demonstrate that the noise model is valid for the existing site. This could be done by comparing the existing measured noise emission from the site with predicted levels for the same scenario at reference points.
- 6) Chapter 3 of the noise report states that the site does not have a history of complaints. However, the site does have a history of exceedances of EPL limits, reporting exceedances in 2017, 2016 and 2015. The noise report should be updated to address this history of non-compliance and identify reasonable and feasible noise mitigation measures as part of this modification.
- 7) The report does not provide sufficient information on how the predicted noise levels were calculated, the source levels used, the type of noise sources, the number and location of equipment operating and calculation methods used in the predictions. The noise report should be updated to include this information.
- 8) The report does not provide information on how meteorological conditions have been accounted for. The noise report should provide an explanation of how meteorological conditions have been accounted for in accordance with NPfI Section 3 and Fact Sheet D.
- 9) An assessment for annoying characteristics using NPfI Fact Sheet C should be included.

Recommendation:

The EPA requests the Department seeks a response to the above matters and the submission of a revised noise assessment.