



DOC21/524493-2

Department of Planning, Industry and Environment
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Email: joel.herbert@planning.nsw.gov.au

Dear Mr Herbert

Menangle Quarry - DA85/2865 MOD 2 - Conveyor Removal
Menangle Sand and Soil Pty Ltd

I am writing in response to the Department of Planning, Industry and Environment's (DPIE) request for advice from the Environment Protection Authority (EPA) for the proposed modification Mod 2.

The proposed modification is seeking approval to

- allow the transport of material between the Stage 8 extraction area and the processing area by off-road haul truck using existing tracks; and
- remove the approved installation and use of the conveyor from the Development Approval (the conveyor has not been installed).

Based on the information provided the EPA does not support the MOD. In the EPA's experience operating off-road trucks along unsealed haul roads has the potential to generate considerably more noise and dust than the use of a well-designed and operated conveyor. Air quality impacts from haul road operation can be significantly increased under hot, dry, windy conditions, and also provide an additional environmental management challenge for site operators. Benefits from conveyors are even greater for projects with a long life, such as the 15 year project life planned for Menangle Sand and Soil. Increased noise and dust impacts are described in the Modification Report.

The text of the Mod states:

- Operational noise levels will increase by >1 dB at location 4 and will be unchanged at other locations while meeting operational noise criteria.
- EMM Consulting calculated an annual increase in total suspended particles (TSP) emissions of 18.1 tonnes per annum (tpa) using an off road truck on a haul road instead of the conveyor (under worst case scenario). This is considerable and equates to a 28.7% increase in annual TSP emissions from the project.

On balance it would appear that any short-term environmental impacts during conveyor construction would be offset considerably by reduced impacts over the 15 year project life.

The justification for the modification outlines that not constructing the conveyor will reduce the impact on the surrounding environment, allowing for biodiversity restoration to commence earlier as well as removing the risks from operating the conveyor in the restoration areas. This appears to be

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somewhat inconsistent with the information provided in the Environmental Assessment (EA) dated 23 May 2017 (Attachment 1) which was used in the determination of the Quarry Extension.

Should NSW DPIE approve the modification, the EPA recommends the proponent be required to undertake site specific determination of best management practices to manage dust emissions from its proposed haul road operations. Additionally NSW DPIE require the implementation of Approval Conditions B13(c) ongoing monitoring to confirm compliance with the Air Quality Criteria (Approval Condition B12)

If you have questions regarding the above, please this office on (02) 4224 4100.

Yours sincerely



09.07.2021

WILLIAM DOVE
Unit Head Regulation

Attachment 1: EA 23 May 2017

Excerpt from:

***Environmental Assessment Menangle Quarry Extension | 15 Menangle Road, Menangle
Prepared for Menangle Sand and Soil Pty Limited | 23 May 2017***

Section 1.2 page 6

The conveyor will require the clearing of some exotic vegetation (large Privet trees) under the bridge, however this will be done as part of the restoration (offset) program. The conveyor will be a temporary structure that will be removed upon completion of the project. It will require a 1 m wide corridor and will be constructed on the edge of the existing access racks through the proposed restoration area and extraction area (Figures 3.2–3.7), and therefore will not require additional vegetation clearing or offsets. The conveyor is 1 m wide, painted green in colour and will be sited 1 m off the ground. The conveyor route will be selected such that no native trees are cleared. Reliance will be on existing tracks to access the extractions site and a new temporary haul road will be established to haul extracted sand and soil to the conveyor loading point and to access rehabilitation and restoration areas, (see Section 3.1.5).