

Our reference: SF20/40051; DOC20/394411-08
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LIDSDALE SIDING COAL LOADER MODIFICATION 3

I refer to the Planning Matters Portal notification received on 19 June 2020 from the Department of Planning Industry and Environment (DPIE) requesting the Environment Protection Authority (EPA) provide comment on the additional information provided to support the Lidsdale Siding MOD 3 – Submissions Report (the Report) for the modification to development consent 08_0223-Mod 3 (Mod 3) for the Lidsdale Siding (the premises).

The EPA has reviewed the Report and discussed the matters raised in the Report with Centennial Coal's consultant EMM, on more than one occasion. The EPA considers that the Report does not fully address the EPA's queries and would like to request further information. The reasons are:

The EPA often sets noise limits in a licence based on the noise emission levels provided in a noise impact assessment. As these noise levels are statutory limits the EPA needs to have confidence that they are achievable and represent a reasonable worst-case noise level under specific meteorological conditions to an acceptable level of accuracy.

Although the EPA does not endorse any particular method to predict noise, it will review the inputs and outputs for adequacy. Where a modification application is proposing noise levels above recommended noise limits, the reasons for this need to be appropriately justified as it may lead to the EPA setting noise limits above those established in an existing consent, or the Project Noise Trigger Level (PNTL) derived using the Noise Policy for Industry (NPfI). If the EPA are to set a noise limit above previously recommended levels (e.g. an existing consent or the PNTL), then it needs to have confidence that the noise emission levels are representative of the reasonable worst case.

In the case of Mod 3, noise levels have been predicted above both the PNTL and the existing consent noise limits. On face value, the method used to predict the noise levels in Mod 3 application has the potential to be overly conservative by double-counting meteorological enhancements. This may lead to the EPA setting higher noise levels than is reasonably representative of the premises actual noise emissions. In these circumstances it is considered reasonable and appropriate for EPA to carefully evaluate the modelling approach used.

Table 1 of the Report compares three scenarios:

- 1) CONCAWE neutral,
- 2) CONCAWE noise enhancing and
- 3) ISO9613-2.

Following the discussion held on 22 June 2020, EMM confirmed that scenarios 1 and 2 were calculated using ISO9613-2 with the CONCAWE meteorological correction applied which means

that scenarios 1) and 3) are essentially the same because the CONCAWE neutral correction is not applied in the EMM modelling method. As such, the scenarios presented in the Report do not address the EPA's previous request that justification be provided for the use of a calculation method that appears to apply two meteorological corrections.

Requested Information

In order to understand the difference between using one or two meteorological corrections in a calculation, the EPA requests provision of the following information:

- 1) CONCAWE prediction under neutral conditions (using only CONCAWE algorithms for all attenuation, no ISO9613-2);
- 2) ISO9613-2 prediction (no meteorological corrections);
- 3) CONCAWE prediction under noise enhancing conditions (using only CONCAWE algorithms for all attenuation, no ISO9613-2); and
- 4) ISO9613-2 + CONCAWE K4 prediction under noise enhancing conditions (ISO9613-2 with the CONCAWE K4 meteorological correction).

This information is necessary for the EPA to recommend appropriate and achievable noise limits to DPIE.

Should you have any further enquiries in relation to this matter please contact Mr Matthew Prince at the Central West (Bathurst) Office of the EPA by telephoning (02) 6883 5354 or via email central.west@epa.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'SL', positioned above the printed name.

Sheridan Ledger
Unit Head Regulatory Operations
Environment Protection Authority