



Our reference: SF20/40051; DOC20/595261-3
Contact : Mr Matthew Prince; (02) 6883 5354

Mr Paul Freeman
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

30 July 2020

Dear Mr Freeman

Lidsdale Siding Mod 3 - Unloader TARP removal (MP08 0223-Mod-3)

I refer to the the letter received by the Environment Protection Authority (EPA) on 20 July 2020 prepared by EMM Consulting Pty Limited (EMM), (*Letter, Re: J200173 - Lidsdale Siding Modification 3 - Response to additional EPA submission re: noise, dated 20 July 2020, EMM Consulting Pty Ltd reference: J200173 LR_2 v1*) responding to matters raised by the EPA for the Lidsdale Siding Mod 3 contained in correspondence dated 25 June 2020.

Background

In summary, the EPA understands that the Lidsdale Coal Loader (LCL) currently receives coal from Springvale Coal Mine (SCM) via overland conveyor for distribution to market. SCM also supplies the Mount Piper Power Station (MPPS) with coal via overland conveyor. Under current planning approvals, the LCL may also receive coal via rail and supply the same to MPPS when coal reserves are low. However, the LCL may only receive coal when circumstances in a Trigger Action Response Plan (TARP) are triggered. Current planning requirements restrict train arrivals / departures to up to seven laden trains per day with an average of 5 a day averaged over a calendar year. Coal train loading operations cannot be undertaken on the same day as coal train unloading operations and the facility can only receive and unload trains during the daytime period (ie 7.00 am–6.00 pm Monday to Saturday and 8.00 am– 6.00 pm Sundays and public holidays).

The EPA understand that:

- the coal throughput of the facility will not change; and,
- that the number of trains allowed to arrive / depart the site is not proposed to change; and,
- that train arrivals / unloading will continue to be restricted to daytime only, however other activities including train loading and dispatch may continue 24/7.

In practical terms the modification will remove the TARP triggers for train arrivals / unloading and will change the ratio of laden train arrivals versus laden train departures without affecting other planning approval requirements in term of throughput and train numbers. While the quantum of activities and throughput of the facility will remain unchanged, the noise impact assessment supporting the application identified a need to re-evaluate noise limits against current policy requirements i.e. the *Noise Policy for Industry (NPfI – EPA, 2017)*.

Noise Recommended Conditions of Consent

The EPA considers that EMM have provided sufficient evidence to support their noise predictions using ISO9613-2 and the EPA has recommended a position on this basis. If the Department of Planning approve the application, the EPA recommends that the noise limits in Table 1 be applied in the planning approval. The recommended day period limits in the consent have been retained, unless the predicted levels are above the existing limits in which case they have been set equal to the best achievable level as predicted by the proponent. The modification did not propose any changes to evening and night period activities or provide information to suggest or support a need to alter the limits and so remain.

In recommending the noise limits in Table 1 below, the following additional matters were considered by the EPA:

- The *Noise Policy for Industry* matters for consideration when dealing with existing industrial developments,
- The noise impact assessment submitted with the application only considered and assessed noise from the facility during the daytime period;
- While the modification does not propose to change requirements for laden train arrivals and unloading to occur only during the day, the LCL will continue to operate during the evening and night and limits should continue to apply; and
- Noise enhancing meteorological conditions have been applied to the noise limits consistent with the existing consent and EPL.

Table 1 – Noise limits

Location		Noise limit			
		Day	Evening	Night	
ID	Description	LAeq,15min dB	LAeq,15min dB	LAeq,15min dB	LA1,1min dB
R1	Lot 2 Main St Wallerawang	50	50	50	55
R2	Black Gold Cabins, Main St Wallerawang	48	46	46	49
R3	Killarney, Brays Lane, Wallerawang	48	47	47	56
R4	Fairview, Brays Lane, Wallerawang	43	43	43	54
R5	Duncan St Lidsdale	46	46	46	57
R6	Old Castlereagh Highway, Lidsdale	43	43	43	56
R7	Royal Hotel, Main St, Wallerawang	44	41	41	49
R8	Corner of Heel St and Cripps Ave, Wallerawang	43	40	40	45
R9	Corner Cripps Ave and Pindari Pl, Wallerawang	40	39	39	45
R10	Brays Lane South, Wallerawang	45	45	45	50
R11	Tara, Brays Lane, Wallerawang	45	45	45	51
R12	Brays Lane Corner, Wallerawang	43	43	43	51

- a) Day means the period from 7am to 6pm Monday to Saturday and the period from 8am to 6pm Sunday and public holidays.
b) Evening means the period from 6pm to 10pm.
c) Night means the period from 10pm to 7am Monday to Saturday and the period from 10pm to 8am Sunday and public holidays.

The noise limits apply under the following meteorological conditions:

- a) The noise limits set out in Table 1 of the conditions apply under the following meteorological conditions:

Assessment Period	Meteorological Conditions
Day	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level
Evening	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level
Night	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level; or Stability category E and F with wind speeds up to and including 2m/s at 10m above ground level.

- b) For those meteorological conditions not referred to in condition (a), the noise limits that apply are the noise limits in Table 1 plus 5dB.
- c) The meteorological conditions shall be determined from meteorological data obtained from the on site meteorological weather station at EPA Identification Point 9.
- d) Stability category shall be determined using the sigma-theta method (Section D1.4) from Fact Sheet D of the *Noise Policy for Industry* (NSW EPA, 2017).

Other Recommended Conditions of Consent

Having regard to the scope of this modification and the existing conditions of the environment protection licence for the premises, the EPA does not recommend any further conditions of consent.

Should you have any further enquiries in relation to this matter please contact Matthew Prince at the Central West (Bathurst) Office of the EPA by telephoning (02) 63333800 or via email central.west@epa.nsw.gov.au

Yours sincerely



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Environment Protection Authority