

Attachment 1 – Department's Comments on RTS dated 21 December 2021 (SSD-10396)

Noise

- Measurements undertaken by Renzo Tonin and reporting of environmental noise appear to be only partially consistent with the AS 1055:2018. Duration of measurement, number of maximum noise events and contemporaneous notes recorded during the attended survey identifying how the variety of observed sounds contributed to LAeq(t) are missing in the Addendum NIA.
- There is insufficient information provided in Appendix C of the Addendum NIA to confirm the modelled emission inputs are representative of the worst-case emission scenario. Timing of short-term on-site sound power level surveys should be correlated to longer-term noise monitoring data collected in close proximity to the site and at some key residential locations (including 2 Eggleton Street, 11 Anthony Street and 13 Anthony Street in Blacktown). The Department notes that the operational condition of the noise source and its variability should be monitored as per Section 7 of the Noise Policy for Industry and Section 7 of the AS 1055:2018.
- Renzo Tonin has adopted a different noise calculation algorithm (CONCAWE) in the Response to RFI compared to the EIS and Response to RTS (ISO 9613-2). Sound propagation settings which affect the calculation of noise levels at the most affected residential area have also changed (specifically, the newly selected ground cover combination is likely to have resulted in lower predicted noise levels farther away). As requested on 1 September 2021, the Department requires the use of any calculation procedure and settings be justified according to the circumstances of this particular locality and evidence of validation be provided. Please address model validation by comparing calculated and measured maximum (LAmax) noise levels in close proximity to the site and at some key residential locations (including 2 Eggleton Street, 11 Anthony Street and 13 Anthony Street in Blacktown).
- The Addendum NIA provided a qualitative assessment to justify the exclusion of intrusive noise characteristics. As requested on 1 September 2021, noise monitoring records and an evaluation of impulsive noise using the method outlined in AS 1055:2018 should be provided to establish the effectiveness of existing and proposed noise mitigation measures at reducing the impact of impulsive noise.

Plans

- The Department notes the Stockpile Plan (Final Stockpile Plan Approved by LEC Proceeding 2020/00365487) has been described as an 'end of day' plan. Please provide a worst-case working stockpile plan (rather than an end of day plan) which shows drop off and loading points and demonstrates that heavy vehicles can access the active site, stockpiles and relevant buildings.
- It is unclear from the swept paths shown on the Stockpile Plan if the access routes to the west of the combustible stockpiles, to the north of Building B and between Building C and the existing shear are intended for use by the largest vehicle accessing the site. Please update the plan to demonstrate which vehicles can access the shown paths.
- Show, on the site plan, where the bins, large spare parts and cranes would be stored if the 'storage area' to the south of Building C is used for queueing trucks.
- Provide plans (including elevations and sections) of the proposed 16 m high noise wall along the south-eastern boundary of the site and ensure all site plans include the proposed noise wall.

Other

- Provide a detailed visual impact assessment (including photomontages and perspectives) of the proposed noise wall, including height and scale, materials and finishes and colours. Please ensure the assessment responds to Council's comments dated 20 January 2022 and also addresses potential impacts to adjacent industrial facilities.
- Noting the Stockpile Plan has been described as an 'end of day' plan, please liaise with FRNSW regarding fire vehicle access and manoeuvrability during active operational hours.
- The Department notes the information provided in Appendix D regarding operation of the facility. However, to ensure sufficient information is provided for this new SSD application, please provide a process description which includes details of how the plant operates.
- For each stockpile, please provide the proposed maximum waste storage in tonnes.