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Department of Planning and Environment
4 Parramatta Square,
12 Darcy Street,
PARRAMATTA NSW 2150
Email: shaun.williams@planning.nsw.gov.au

Attention: Mr Shaun Williams, Senior Environmental Assessment Officer

Dear Mr Williams,

Notice of Exhibition for the Glebe Island Silos Throughput Capacity Increase (DA-188611) – Lot 12 Sommerville Road, Rozelle

Thank you for your letter to the Environment Protection Authority (EPA) dated 2 March 2022 regarding the exhibition of the Environment Impact Statement (EIS) for Cement Australia Holdings Pty Ltd's throughput increase of cement from 500,000 tonnes per annum (tpa) to 1,200,000 tpa at their premises located at Lot 12 Sommerville Road, Rozelle. No physical works are required to enable this increase in proposed operational throughput capacity.

The EPA has reviewed the following documents:

- Environment Impact Statement, Lot 12 Sommerville Road, Rozelle (Glebe Island Silos), Cement Handling and Distribution Facility Capacity Upgrade by Ethos Urban dated 16 November 2021.
- Cement Australia Glebe Island Throughput Increase Project - Noise Impact Assessment by ERM dated 16 November 2021 (herein referred to as the NIA).
- Cement Australia Glebe Island Throughput Increase Project - Air Quality Assessment by ERM dated 23 September 2021 (herein referred to as the AQA).

The EPA advises that there are matters that must be addressed before General Terms of Approval can be issued. Please see Attachment 1 for specific details.

If you wish to discuss any of these matters further, please contact Shelley Nancarrow, Senior Operations Officer on 02 9995 6808 or shelley.nancarrow@epa.nsw.gov.au

Yours sincerely

29 March 2022

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Unit Head Regulatory Operations
Regulatory Operations Metropolitan

Attachment 1: EPA comments on EIS for Glebe Island Silos Throughput Capacity Increase

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General Comments

Cement Australia currently holds Environment Protection Licence (EPL) No. 4310 for the scheduled activities of shipping in bulk and cement or lime works that are occurring at the site.

Noise

Glebe Island White Bay has recently been the subject of an initiative by Port Authority of New South Wales that culminated in the publishing of the Glebe Island and White Bay Port Noise Policy (GIWBPNP). In summary, the GIWBPNP assigns vessel trigger noise levels and remedial provisions for ships that do not meet the trigger levels with the long term aim of reducing noise from vessels using the port. The policy also intends to apply a precinct approach to manage landside activities. At this stage the GIWBPNP adopts the urban industrial interface amenity noise levels (described in the Noise Policy for Industry (NPfI) (EPA, 2017)) for landside activities as a cumulative (precinct) limit. The Port Authority intends to assign landside noise levels to individual port users that are aimed, if feasible and reasonable, to ensure that the cumulative limit is not exceeded. However, at this time these limits have not been developed.

The Secretary's Environmental Assessment Requirements (SEARs) issued for the development are quite generic and reference "relevant Environment Protection Authority guidelines" and do not appear to reference the GIWBPNP, however the NIA has significantly relied upon the policy for assessment purposes.

Can DPE please confirm whether it is appropriate for noise impacts from project to be assessed and managed in accordance with the principles outlined in the GIWBPNP rather than the NPfI? During the development of the GIWBPNP, the EPA advised the Port Authority to consult with DPE to determine whether the policy would have any status in the planning system.

The EPA's comments regarding the NIA assumes that the GIWBPNP will have some status in the determination of the application:

1. The increase in frequency of vessels to service the proposed increased throughput should be managed via the GIWBPNP noting that some vessels servicing Cement Australia have been subject to noise mitigation in a proactive attempt to satisfy the GIWBPNP. The vessels involved in the mitigation program are: Akuna, Wyuna and Kondili. The NIA suggests that vessels servicing Cement Australia will closely approach the vessel trigger noise levels with a 2dB exceedance identified at Batty Street Balmain (see NIA, Table 3.4). Any planning approval could seek to reinforce the GIWBPNP by requiring that only ships that either meet or have been noise attenuated to seek to meet the GIWBPNP be used to service the development.

   The NIA appears to erroneously apply a +5dB adjustment to the vessel trigger noise levels in Section 5 when a daytime VTNL of 65dB is noted. The VTNL for daytime is LAeq,daytime 60dB and compliance against this level is reported.

2. As noted above, the process to assign landside trigger levels to individual users at the port has not been completed. As a practical way forward, the EPA suggests that Cement Australia be assigned landside trigger noise levels based on the cumulative limit (i.e. NPfI - urban industrial interface amenity noise levels) minus 10dB as a conservative interim assessment approach. The predicted landside noise levels in the NIA (Table 6-2) suggest that these conservative levels could be closely approached with a negligible 1dB exceedance identified at night at Batty Street Balmain. That said, the EPA has the following concerns about the landside modelling presented in the NIA:

i. The NIA indicates at section 6.2 that: *"The difference between the day/evening and night-time noise contours is the truck movements which are at a lower frequency in the night-time period"*. However, the night-time contours in Figure 6.2 are higher than the daytime levels in Figure 6.1. Additionally, the contours indicate higher noise levels than the levels reported in Table 6.2. **This anomaly needs to be explained and justified.**

ii. Section 6.1.3 of the NIA indicates that: *"The SWL* [sound power level] *for facility mechanical equipment were based on representative data from ERM's database"*. A single sound power level has been presented in Table 6.1 for "Facility Mechanical Equipment". Given that the facility is existing and no changes to mechanical plant are proposed, the sound power levels used in the assessment should be based on measurement of the existing plant and equipment. Significant noise sources should be identified through site surveys, and the location, height and sound power level established, reported and used in the noise model. **The current approach to model facility mechanical plant and equipment is considered inadequate.**

iii. Section 6.1.3 of the NIA also indicates that: *"Night-time measurements were used for calibration purposes as they were less influenced by noise sources unrelated to port activities",* however no further details are provided about model calibration or validation. **Details of model validation and calibration should be provided**.

iv. Table 6.1 of the NIA indicates that trucks were modelled using a line source. **Additional detail is required for example assumed speed profile through the site, source height etc**

v. The NIA reports at Section 6.1.2 that the ISO9613 model has been used and further that: *"Typical noise enhancing night-time meteorological conditions were modelled (Temperature 10°C, Humidity 90%, no wind). Neutral meteorology settings were used in the model, with the harbour 100% acoustically reflective and the surrounding land areas 50% acoustically reflective to represent a conservative modelling output"*. EPA notes that the ISO9613-2:1996 standard states the model is based on source to receiver wind speeds between 1-5m/s or a well-developed ground based temperature inversion. **Additional clarification / explanation of the commentary in the NIA as to whether the model has considered noise enhancing or "neutral" conditions while implementing the ISO9613 algorithms is required.**

3. Cumulative impacts from the increased throughput and existing operations are reported in the section 6.3 of the NIA. However, only the activities of Hanson Concrete and the increase throughput of the Cement Australia have been considered. Other noise sources such as Gypsum Australia, White Bay Cruise Terminal and the construction of the Metro West etc have not been considered in the cumulative assessment. While the recommendation for the use of a conservative assessment approach under item iii above attempts to address the lack of information about existing landside activities and noise levels, the SEARs require a cumulative assessment. **A cumulative noise impact assessment that includes impacts from existing onsite operations within Glebe Island White Bay and from surrounding developments should be undertaken as required by the SEARs.**

4. While section 6.4 of the NIA suggests that maximum noise events associated with truck movements are predicted to satisfy screening noise levels presented in the assessment, vehicle movements on the site will need to be carefully and effectively managed with both operational controls and management supervision. **DPE may wish to require through any planning approval a heavy vehicle noise management plan to ensure that maximum noise events are effectively controlled and managed through measures including driver training and behaviour, speed limits, road surface etc.**

Air Quality

EPA has reviewed the AQA for the Glebe Island Cement capacity increase. The AQA does not include dispersion modelling but has provided a semi-quantitative assessment of emissions and concludes that modelling is not warranted as the increase in emissions from the proposal are unlikely to result in any measurable impact.

The EPA advises that the AQI has been prepared in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW and does not consider that dispersion modelling is necessary for this proposal. The EPA considers that the proposal will not result in any appreciable impact increase at receptors and notes that there is no impact change from the facility as material transfer occurs in enclosed conveyors with baghouses for particulate control and will have no external stockpiles.

The EPA advises that emissions are primarily from ships and are predicted to approximately double due to the proposal, however it is noted that this may be reduced in the near future (2024) due to the planned implementation of shore power at Glebe Island and White Bay. The EPA also notes that the AQA presented PM_{10} data from 3 ambient air monitoring stations, which showed good agreement and are unlikely to be significantly changed from the proposal.

The EPA considers that the SEARs have been adequately addressed.