



Our Ref: DOC16/462924

Department of Planning and the Environment
Resource Assessments
GPO Box 39
SYDNEY NSW 2001

Dear Ms Dawson

**Luddenham Clay/Shale Quarry
Epic Mining Pty Ltd 275 Adams Road, Luddenham
DA 315-7-2003 MOD 4**

I refer to your email received by the NSW Environment Protection Authority (EPA) on 14 September 2016 in regards to the abovementioned modification application.

The EPA has reviewed the documentation entitled "Environment Assessment Report – Luddenham Clay and Shale Quarry" prepared by National Integrated Creative Solutions dated 25 August 2016.

The comments provided detail where analysis is limited and where additional information is requested.

Water Quality

It is suggested that NSW Department of Planning and Environment (DPE) update condition 24 to include an additional section "Leachate Storage System Management" within the *Site Water Management Plan*.

Noise Impact

Although noise sources within the boundary are expected to be similar to previous acoustic studies, the impact assessment did not meet appropriate standards. The proponent must ensure that all noise monitoring is undertaken in accordance with Australian Standard AS 2659.1-1998: *Guide to the use of sound-measuring equipment – Portable sound level metres*, or any revision of that standard which may be made by Standards Australia, and the compliance monitoring guidance provided within the NSW Industrial Noise Policy.

It is suggested that any potential noise impacts are predicted through the use of computer noise modelling. Noise models take into account noise attenuation due to distance, atmospheric absorption, barriers, effects of intervening ground types and weather conditions.

Composting

It is suggested that DPE include the following condition:

the applicant shall prepare and implement a Composting Risk Management Protocol in consultation with the NSW EPA that meets the requirements outlined within *Guidance on the Resource Recovery Order and Exemption for Mulch* (NSW EPA, 2016); *Environmental Guidelines: Composting and Related Organics Processing Facilities* (DEC, 2003) AS 4454-2003 *Composts, soil conditioners and mulches* alongside relevant legislation and guidelines.

To assist in the assessment of this application, the proponent must provide further detail on the composition of the compost in order for the EPA to adequately assess and characterise any potential odour. The proponent must nominate which of the current *Resource Recovery Orders and Exemptions* are applicable under clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014*.

The proponent must conduct a screening level odour assessment which identifies all potentially affected zones and details:

- all phases of processing (i.e: pre-treatment, decomposition, aeration and maturation),
- all associated impacts during receipt, stockpiling and storage.

The proponent must ensure that the receipt and movement of raw organics and organic products is documented. At a minimum, the quantity of each category of organics received at the premises must be recorded together with its source.

Environment Protection Licence and Appropriate Regulatory Authority role

On review of the activities outlined within the assessment, the premises will require a variation to the existing Environmental Protection Licence issued under s48 *Protection of the Environment Operations Act* ("POEO Act").

Should you have any further questions please contact Tenille Lawrence 9995 6107 for assistance.

Yours sincerely



STUART CLARK
Acting Unit Head - Sydney Industry
Environment Protection Authority

Enclosure