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REF:	27257-1-20054-02
TO:	CLEANAWAY
ATTENTION:	Les Egerton
ADDRESS:	Les.Egerton@cleanaway.com.au
FROM:	Paul Daly
DATE:	17 February 2021
SUBJECT:	**LICENCE L8904/2015/1** **BANKSIA ROAD PUTRESCIBLE LANDFILL, CROOKED BROOK**

Les,

The purpose of this memorandum is to assist in closing out the Department of Water and Environmental Regulation (DWER) concerns raised with the acoustic assessment carried out for the above Licence Approval application.

The following information is required to be used in conjunction with Herring Storer Acoustic (HSA) report *25566-2-20055 (Licence Condition Noise Monitoring March 2020*) and the subsequent assessment *26966-1-20054-02 (December 2020*). These reports support, via the use of noise measurement the Cleanaway site in Dardanup is compliant with the Environmental Protection (Noise) Regulations 1997 for the current operations, and using predictive noise modelling, (calibrated by measured noise levels), will be compliant with the proposed future operations.

The Delegated Officer has provided the following the information regarding noise emissions as a response to the licence application:

1. *Eleven noise complaints have been received in 2020 relating to the Premises.*
2. *March 2020 noise monitoring was inconclusive and has led to uncertainty on whether the prescribed noise levels are being met.*
3. *An investigation by DWER into noise from the Premises is ongoing.*
4. *No new noise controls have been proposed and existing controls rely on site management measures which have not been consistently applied at the Premises.*
5. *The Delegated Officer acknowledges that this Premises may not be the only Premises contributing to noise in and around the Dardanup Waste Precinct.*

As requested, we provide clarification of the methodology used for the noise validation assessment submitted to satisfy Condition 2.5 of Licence L8904/2015/1**.**

The above delegated officers' response is understood to be based, in part, on a technical review conducted by the DWER, Environmental Noise Branch (ENB) on the acoustic assessment and as such we provide the following clarifications:

1. Eleven noise complaints have been received in 2020 relating to the Premises.

It is unclear as to the nature and location of these noise complaints, however from information provided by the Cleanaway site manager for the Dardanup facility, there is an issue with trucks utilising Banksia Road south of the site to access Crooked Brook Road. Cleanaway have a procedure in place where any trucks / contractors using the facility are aware that Banksia Road south of the site is not to be accessed, with all traffic to use Banksia road north. Whilst this may not be the source of all the noise complaints, it is understood to be an issue with residences located along the south section of the road, therefore has been a focus of control for Cleanaway. Expectations are that trucks using this section of roadway, may be the catalyst for complaint. It is further noted that Cleanaway do not control all contractors using this roadway, hence there may still be access from truck movements which supply other prescribed premises' in the area.

2. March 2020 noise monitoring was inconclusive and has led to uncertainty on whether the prescribed noise levels are being met.

The stipulations of the licence conditions were,

> ***(a)*** *validate the noise modelling calculated within Environmental Acoustic Assessment, 24762-2-19122-02, Herring Storer Acoustics, September 2019, by undertaking noise measurements at, or as near as possible, to the nearest noise sensitive premises.*

This condition formed the basis of the monitoring locations, being at the closest residence, and at the site boundary. The noise levels at the two locations were analysed to assess if there was a correlation between the two points.

As noted in the acoustic report, information for the assessable noise level at the nearest highly noise sensitive premise was based on the data recorded over a 10 day period. During this period, there were various weather patterns, for which, a period of the most favourable conditions was sought in that noise emissions from the site were at the highest propagation towards this receiver, being light winds from the eastern quadrant.

Added to this period of most ideal propagation, the most stringent criteria / period in regards to the noise regulations needs to be assessed, namely night time between 22:00 and 07:00. As outlined in the assessment, and the application for the proposed licence, the site starts operations at 06:00, with this generally being limited to truck movements. Full site operations are not in place until after 07:00.

The measured noise levels were analysed in full (10 day period), with the most conducive for the highest noise levels from the site at the nearest residence being the morning of the 3rd. The 10 day period is attached for reference purposes.

Based on the parameters for gaining the highest noise levels attributable to the Cleanaway facility, it leaves a relatively small window of opportunity for providing an assessable noise level at the residence. Whilst it may appear that that limited data is analysed, this is not the case, with all information pertaining to the 10 days of monitored noise levels being contained within the report for informational purposes.

Predictive noise modelling for this time period shows that the assessable noise level at this residence (R1 - monitoring location) is 30 dB(A) under the highest noise propagation conditions. This modelling is based on worst case noise sources, being all equipment's considered in operation at the same time.

As outlined in the assessment, noise levels attributable to the Cleanaway site are difficult to distinguish over background noise. This would be expected at the modelled noise level of 30 dB(A). A link to wav files is included below where the audible noise levels are able to be confirmed.

HSAcoustics - Wav files

3. An investigation by DWER into noise from the Premises is ongoing.

This is welcomed by the client. Expectations are that the investigation will provide further validity to the ongoing noise studies for the Dardanup operations.

4. No new noise controls have been proposed and existing controls rely on site management measures which have not been consistently applied at the Premises.

Noise control in the form of management of the site and its noise emissions forms a part of the current operations.

The acoustic assessment is based on same operating parameters with an increase in waste volume, which equates to an additional 5 truck movements per day. The infrastructure is not increased to accommodate this additional waste, hence from an acoustical perspective, it is the increase in truck movements which has the potential to impact noise levels. As the truck noise emissions have been assessed under the L_{A10} noise parameter, it considers noise which will be present for greater than 10% of the representative period. Therefore, consideration of this additional five trucks movements per day has been factored into the acoustic assessment, and has an insignificant impact on the total noise for the site. It is further noted that this does not constitute a risk factor in the DWER response to the licence application.

5. The Delegated Officer acknowledges that this Premises may not be the only Premises contributing to noise in and around the Dardanup Waste Precinct.

Comment noted.

We trust this clarifies the queries, however, should you have any further questions, please do not hesitate to contact this office.

Yours faithfully,
for **HERRING STORER ACOUSTICS**

Paul Daly

Att.

HERRING STORER
ACOUSTICS