

Submission Group	Submission reference number	Author of Submission	Submission summary	Key Environmental Aspect	EIS Reference Mentioned/Addressed	Specific response
	1	OEH Amy Dumbrell 15/10/18	Heritage Induction Prior to onsite disturbance commencing, the designated project team including all contractors on site shall undergo heritage induction, which will include an archaeological awareness component to reinforce the importance of archaeological issues and the management measures that will be implemented.	Heritage Induction	Addressed in EIS Section 13.7.1	As per section 13.7.1 of the EIS, prior to commencement of Project activities, all workers and sub-contractors will complete a cultural heritage induction which will include heritage and archaeological awareness and the subsequent adopted management measures.
			Unexpected Finds Procedure In the event of an unexpected discovery of archaeological relics during ground disturbance works the Unexpected Find Procedure should be followed. The procedure details the actions to be taken when a previously unidentified and/or potential Aboriginal and/or historical heritage item/object/site is found during construction activities.	Unexpected Finds Procedure	Addressed in EIS Section 13.7.1	EIS Section 13.7.1 and 13.7.2 outlines that an induction will be carried out prior to project activities to inform workers and sub-contractors of the possibility and procedure in the case of unexpected finds. The procedure follows that if during Project works, a suspected Aboriginal object is found, work in that location will stop and OEH notified immediately.
			Discovery of suspected human remains Aboriginal ancestral remains may be found in a variety of landscapes in NSW, including middens and sandy or soft sedimentary soils. If any suspected human remains are discovered during any activity you must: 1. Immediately cease all work at that location and not further move or disturb remains. 2. Notify the NSW Police and OEH's Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location. 3. Not recommence work at that location unless authorised in writing by OEH. <i>If you have any questions, please contact Bronwyn Smith on 9873 8604 or by email at bronwyn.smith@environment.nsw.gov.au</i>	Discovery of suspected human remains	Addressed in EIS Section 13.7.2	The procedure in the event of the discovery of suspected human remains during works is addressed in EIS Section 13.7.2. This information will be included in the induction on actions to take if suspected human remains discovered. The procedure to be followed in the event that human skeletal remains are uncovered is; work must cease immediately in that area and the area secured (fenced and / or marked). Jemena will notify the NSW Police and OEH immediately.
	2	Crown Lands Mohammed H Rahman 29/10/18	A Land status investigation on Kendall Bay Sediment Remediation Project (SSD 6701), shows that there is no Crown land features exist. Therefore, No comments from Crown land at this moment.	No issue	Addressed in EIS Section 3.4.4	No action required, however, response is acknowledged.
	3	EPA Erin Barker 6 November 2018	Please refer to EPA Kendall Bay Sediment Remediation Project (SSD 6701) EIS comments in letter from Erin Baker dated 6 November 2018.	Noise	Mentioned in EIS Section 9.6	Please refer to Jemena EPA response letter from Phil Hutson dated 30 November 2018.
			Please refer to EPA Kendall Bay Sediment Remediation Project (SSD 6701) EIS comments in letter from Erin Baker dated 6 November 2018.	Waste Management	Mentioned in Section 17.7.6 of the EIS	Please refer to Jemena EPA response letter from Phil Hutson dated 30 November 2018.
			Please refer to EPA Kendall Bay Sediment Remediation Project (SSD 6701) EIS comments in letter from Erin Baker dated 6 November 2018.	Water Quality	Mentioned in Section 11.8 of the EIS	Please refer to Jemena EPA response letter from Phil Hutson dated 30 November 2018.
			Please refer to EPA Kendall Bay Sediment Remediation Project (SSD 6701) EIS comments in letter from Erin Baker dated 6 November 2018.	Air quality and odour	Mentioned in Chapter 8 of the EIS	Please refer to Jemena EPA response letter from Phil Hutson dated 30 November 2018.
	4	Health (Letter from Dr Teresa Anderson 12 November 2018)	Exposure to contaminated sediments The chemicals of most concern to human health were found to be polycyclic aromatic hydrocarbons (PAHs), particularly carcinogenic PAHs, levels of which are expressed as benzo[a]pyrene toxic equivalents (BaP TEQs). However, throughout the EIS it is often not clear that BaP TEQ is the benchmark chemical. Many tables within Appendix 3: Human Health Risk Assessment (HHRA) pertain to BaP TEQs but they are not explicitly identified as such. For example, the Proposed Remediation Criteria tables (e.g. Table ES-1) provide site-specific remediation criteria in mg/kg without stating which chemical the table refers to. We recommend all tables are clearly labelled. In Chapter 14 Human Health of the EIS it is unclear why the remediation criteria for PAHs in the western corner of Kendall Bay are significantly more stringent than those of the beach area and central mangrove area. Although this is covered in the HHRA we recommend a brief explanation be given in relevant sections within the EIS accessed by most readers. In the initial assessments in the EIS, total recoverable hydrocarbons C15-C28 (F3 TRH) are included as chemicals of concern with levels above relevant guideline values. However, later in the EIS, F3 THR is no longer considered as a chemical of potential concern, following exposure assumptions being adjusted to a more realistic scenario. However, F3 THR levels were found to be 14,000 mg/kg in the mangrove area at depth (>300mm) (HHRA Table 39, p55), which is above the adjusted guideline value of 7,500 mg/kg. Further, the Assessment of Site Contamination National Environmental Protection Measure (ASC NEPM) Health Based Investigation Levels and Screening Levels are frequently interchanged with ACS NEMP Management Limits. It is unclear why one guideline is used over the other and vice versa and can make it difficult to interpret the validity of excluding F3 THR. We recommend that the logic for rejecting F3 THR is more clearly outlined. The exposure frequency assumptions underlying the remediation criteria calculations are based on professional judgment. This may be the best option available, but it is difficult to identify that this is the basis of the assumption in the HHRA. We recommend that this be stated more explicitly and that a short explanation is given for the exposure frequency assumptions used. The sensitivity analysis should include a clear interpretation of what the results mean when varying the exposure frequency and bioavailability (HHRA tables 56 and 57, p91). The remediation method for the western edge of mangroves in SA3 should be clarified further as to what exactly is planned for the mangrove root mass. The EIS and HHRA do not entirely correspond with each other and the information presented should be consistent.	Exposure to contaminated sediments	Mentioned in EIS Section 14.6.1, 14.3.1, 14.4.1, 14.8.1	Refer to Jemena letter addressed to Health for full response. Which includes response letter prepared by EnRiskS. 1. PAH is the chemical referred to, and BAP TEQ is taken as the benchmark chemical. Table 11.1. within Chapter 11 of the EIS show benzo[a]pyrene toxic-equivalents (BaP TEQ), representing carcinogenic PAHs. 2. The adopted treatment in this area [Western edge of SA3] is to leave the mangrove root mass in place and ensure that any materials on the surface of the root mass are cleaned of any coke and coal washed onto the surface of the area as discussed below". "...surface rubbish and weathered coal contamination will be removed to a nominal depth of 0.2-0.3 m". This is consistent with the EIS which states in Section 4.3.2 "For the northern area of SA3, surficial coke, coal and rubbish material will be removed / excavated where practicable over the nearshore sand shoal using small earthmoving equipment to a depth of 0.2 metres. For the southern area of SA3, the existing established mangroves, will be retained and coke and coal removed / excavated using a small excavator with rake bucket / hand tools / vacuum excavation to depth of 0.2 metres as required to minimise any damage to the mangroves.
			Noise There will be some intermittent exceedances of odours and noise for some nearby sensitive receivers. We recommend all reasonable and feasible mitigation measures be put in place to reduce the impacts by as much as possible.	Noise	Addressed in EIS Section 9.10	A Construction Noise and Vibration Management Plan (CNVMP) will be developed for the full-scale remediation works. A CNVMP was developed for the field trial and was considered successful in managing noise from the trial works. An important aspect of the CNVMP is ensuring the community is kept informed of the proposed works and provided with details to contact Jemena for further information. As stated in Table 9-8 of the EIS, noise impacts will be managed through the adoption of mitigation measures outlined in Table 9-8 of the EIS and the strict adherence to City of Canada Bay standard construction hours which are 7:00am to 5:00pm Monday to Friday and 8:00am to 1:00pm on Saturday subject to confirmation from Council. Management and mitigation of potential odour issues associated with the Project are a primary focus for the project team. An independent specialist assessment of air quality, including assessment of odour was completed by Todoroski Air Sciences and is included as Appendix 6 of the EIS. Chapter 8 of the EIS reviews the assessment completed by Todoroski and lists Jemena's key commitments to mitigate potential odour issues. A key commitment is to prepare and implement an Air Quality Management Plan (AQMP). The AQMP will include mitigation measures and monitoring with defined trigger levels for further action. The key mitigation measures will include; limit remediation activity to daytime hours, only excavate / expose the minimum area of sediment necessary at any one time, over each skip bin of excavated material immediately once filled, minimise the drop height of the excavator, regular cleaning of remediation equipment, develop and implement a plan for complaints management and conduct ongoing stakeholder engagement.

Authority			Safety It is unclear whether the sheet piling in areas SA 1, NA2, and NA3, after the remediation works is complete and cut to below the level of low tide, could pose a potential risk of injury to people wading along the shoreline. We recommend this be clarified.	Safety	Addressed in EIS Section 14.8.1	The proposed remediation for the rocky areas of SA2 and NA1 adjacent to the seawall reduces the ongoing potential for impacts to human health by removing the surface sediments to below the Lowest Astronomical Tide (LAT) mark, then adding clean rock and sand to a surface level also below the LAT mark. Sheet piles will be removed from areas NA2 and NA3. The sheet piles in SA1 will be cut at LAT 0.0 and remain in-situ below this depth. The risk of injury from the top of the sheet piles will be managed by cutting off the top of the sheet piles at the LAT mark. Further investigations are being undertaken regarding the prevention of scouring to these areas. These methods are being refined, and will be clarified within the RWEMP and RWP documents.
	5	Dept of Industry - Alex King, letter dated 22 Nov 2018	Removal of Sediments Dol - Water and Natural Resources Access Regulator 1. The proposed draft Remediation Works Management Plan; draft Remediation Works Environmental Management Plan and draft Water and Sediment Management Plan should be developed in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018). 2. The management plans identified above should be prepared in consultation with Dol Water. DPI Fisheries 3. The department requests further information on the dimensions of the 30m wall to be constructed in area SA4 and what it will likely be constructed with. A rip rap design to promote aquatic habitat diversity over time is recommended. 4. An assessment should be conducted on the level of potential harm to mangrove pneumatophores during these works and a description of what mitigation measures will be implemented to minimise such harm should be included in the draft Remediation Works Environmental Management Plan. This should cover both the sediment removal and 'clean' sediment placement stages of these works. For the long-term survival and growth of the mangrove trees, it is important that harm of pneumatophores is minimised and that they are not completely covered with the placed 'clean' fill, and that the fill is not packed down too firmly. 5. DPI Fisheries should have the opportunity to review and provide comment on the draft Remediation Works Plan; draft Remediation Works Environmental Management Plan and draft Water and Sediment Plan.	Removal of Sediments	Addressed in EIS Section 18.6 , Section 4.3.2 and Section 12.7	1. As mentioned in Section 18.6 of EIS, the Remediation Works Management Plan, Remediation Works Environmental Management Plan and associated project-specific EMPs will be developed in accordance with Guidelines for the Preparation of Environmental Management Plans (Department of Infrastructure, Planning and Natural Resources, 2004) and Guidelines for Consultants Reporting on Contaminated Sites (OEH 2011), as well as other relevant guidelines which will include the Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018). 2. Jemena are committed to ensuring all relevant parties are involved in the project and are consulted accordingly and so Dol Water will be consulted during the preparation of the raft Remediation Works Management Plan; draft Remediation Works Environmental Management Plan and draft Water and Sediment Management Plan. 3. The approach to the construction of the rock groyne wall is described below. We believe this design meets Fisheries recommendation for a rip rap design which promotes aquatic habitat diversity on this wall over time. Rock Groyne (Seawall Extension) The small groyne wall is an extension to the existing seawall and will be used to contain the replenished material in SA4 and SA5. The concept design is presented below within the rendered NAVISWORKS model. The groyne wall will be constructed sequentially in sections prior to the replenishment of sand in SA4 and SA5. The sub-base will be prepared by an 8T excavator, levelling the natural surface along the alignment prior to placement of geotextile fabric and geogrid liners. The eastern section of the groyne wall will be constructed allowing the internal geofabric barrier, which prevents the mobilisation of sand through the groyne wall, to be placed and secured. The western section will then be placed to complete the wall. Quarried sandstone material which is compliant to the design grading envelope will be delivered to the Tennyson Road facility (staging area) and placed on material barges for transport to Kendall Bay. The 8T excavator will unload the material. It will be transported by power barrows and a skid steer loader to the designated placement location. Placement of the individual sandstone pieces will be via the 8T excavator. Where practicable, sandstone cobbles will be site won through a sieving process at the beaches of SA3, SA4 and SA5 and from remediation areas SA1, SA2, NA1 and NA2/3. Cobbles that fall within the design grading envelope and are clean and free from contaminants will be reused. The rock groyne will consist of graded sandstone cobbles up to a maximum size of 0.56m in diameter. Geofabric will be required at the base and within the cross section of the wall. The typical concept section of the rock groyne is shown in the figure above. 4. As mentioned in Section 12.7 of the EIS, an Ecological Risk Assessment (ERA) was undertaken for the Project by Synnot and Wilkinson in 2018. The findings of the Ecological Risk Assessment including an assessment of the level of potential harm to mangrove pneumatophores during works are summarised in Section 12.7 of the EIS which includes an assessment of impacts to threatened species, habitat loss and water quality. To minimise and manage impacts to mangrove pneumatophores during work within and adjacent to the Project Area, mitigation measures include; minimising the disturbance footprint, rubbish, debris, coke and coal present in the mangroves in SA3 will be manually removed to minimise any impacts to the mangroves and clean sand (VENM) distributed throughout mangroves by hand using wheelbarrows, spades and rakes to protect the integrity of the mangroves. 5. Jemena will ensure that DPI Fisheries will have the opportunity to review and provide comment on the draft Remediation Works Plan; draft Remediation Works Environmental Management Plan and draft Water and Sediment Plan.
	6	RMS Email 26 Nov 2018 from Adam Culbert	No issue RMS has considered the proposed development in terms of its impact on marine safety and navigation. Based on the information provided we do not consider there to be any impacts to the safety of navigation. We have no objection to the proposal.	No issue	-	No action required, however, response is acknowledged.
			Noise Council requests that a condition be developed to ensure that the recommendations of the report are implemented including the development of a Noise Management Plan, to minimise the acoustical impact on the surrounding residents. It is also recommended that the Hour of Operation for works aligns with Councils requirements which include; a. No construction or any other work related activities shall be carried out on the site outside the hours of 7.00 am to 5.00 pm. Mondays to Saturdays. No work to occur on Sundays and public holidays. Where the development involves the use of jackhammers/ rock breakers and the like or other heavy machinery, such equipment may only be used between the hours of 7.00 am - 5.00 pm Monday to Friday only.	Noise	Addressed in EIS Section 9, and 9.11	A Construction Noise and Vibration Management Plan (CNVMP) will be developed for the full-scale remediation works. A CNVMP was developed for the field trial and was considered successful in managing noise from the trial works. An important aspect of the CNVMP is ensuring the community is kept informed of the proposed works and provided with details to contact Jemena for further information. As stated in Table 9-8 of the EIS, noise impacts will be managed through the strict adherence to City of Canada Bay standard construction hours which are 7:00am to 5:00pm Monday to Friday and 8:00am to 1:00pm on Saturday subject to confirmation from Council.
			Air quality and odour Council requests that it is conditioned that air quality monitoring be implemented and as indicated in the EIS an air quality management plan be developed to ensure there is no health risk to the surrounding residents. It is noted that odour is considered as part of this report and that there are recommendations provided to minimise odour complaints and it is essential to address mitigation through conditions.	Air quality and Odour	Addressed in EIS Section 8.10	An Air Quality Management Plan will be developed and will include air quality monitoring and appropriate stages during the works in accordance with recommendations stated in EIS Table 8-7.

7	City of Canada Bay 31/10/18	<u>Traffic</u> Increased heavy vehicular traffic to transport the refuse from the site and import clean fill will result in increased noise and air pollution, congestion on the local road network and road pavement damage. If the use of the local road network is to be considered, it is recommended that a Construction Traffic Management Plan (CTMP) and a Dilapidation Report of the affected local road network be provided. The following matters (at a minimum) must be addressed in the CTMP. It is considered that the following matters, numbered 1 – 4 should be included as conditions or requirements for the applicants to adhere to: 1. Construction Traffic Management Plan A Construction Traffic Management Plan shall be prepared for the proposed site staging works at No. 140 Tennyson Road, Mortlake and shall include the following details: - o A detailed description and route map of the proposed truck/construction vehicle access routes, - o The locations of any proposed Construction Works Zones along the site frontage, - o Provide a construction schedule, - o Tradesperson parking (parking shall be provided on-site where possible), - o Provide relevant Traffic Control Plans (certified by an RTA accredited person i.e. red or orange ticket), - o Provide relevant Pedestrian Management Plans, - o A site plan which indicates site entrances and exits, turning areas within the site for construction and spoil removal vehicles allowing a forward ingress and egress for all construction vehicles on the site (superimposed truck swept path diagrams). Site entrances and exits shall be controlled by a certified traffic controller. - o Require the proponent to log all heavy vehicle movements and loads and report to Council. 2. Impact on local road pavement The following measures shall be undertaken prior to the commencement of works to manage the damage caused by the spoil haulage trucks entering and leaving the site: A) Provide Council with an unconditional Bank guarantee in the amount of \$200,000 to act as surety for the repair of roads impacted by haulage trucks. B) Provide Council with a photographic dilapidation report for the existing haul roads. 3. Road Pavement Inspections and Repairs During the haulage works the applicant shall undertake weekly road pavement inspections and repair road defects that have been caused by the haulage trucks. The applicant shall obtain the repair specification from the City of Canada Bay for each area of repair for each occasion. 4. Repair of Road Pavement Damage At the end of the haulage works the applicant shall inspect the road pavements with the dilapidation report. The applicant shall repair any pavements damage by the works to a condition the same as existed prior to the works. Once the pavements have been repaired to Council's satisfaction Council will refund the Bank Guarantee. 5. Road Levy Council requests that any approval given requires the proponent to pay a fee per vehicle based on the cost of the life of the road assets consumed.	Traffic	Mentioned in EIS Section 16.7.1, 16.72	As stated in EIS Section 16.7.1, a CTMP will be prepared which outlines the listed points. In addition, EIS Section 16.7.2 states that a Road Dilapidation Report will be prepared in order to quantify the degree of road degradation as result of the project and a pre and post works dilapidation report for existing haul road will be provided to Council. In addition, periodic road pavement inspections will be undertaken during haulage works and also at end of haulage works to compare to the dilapidation report and required repairs to haulage road made. Jemena understand the requirement to ensure that any damage to Council roads as result of the remediation project are repaired at Jemena's expense. Jemena are committed to ensuring no net change in the quality of utilised roads caused by the project. Discussions regarding bank guarantees for road repairs and road levies will be held with Council to achieve a suitable outcome to satisfy Council's objective of protecting Council roads.
		<u>Removal of Sediments</u> 1. A detailed remedial works environmental management plan should be developed which thoroughly addresses all environmental issues including noise, air, dust control and odour for Kendall Bay. A plan for monitoring, mitigating and following up complaints should be included in any proposal. It is acknowledged that odour has the potential to be an issue however there needs to be a plan beyond mitigation (Removal of sediment). 2. Validation of the Kendall Bay site in relation to the success of the remediation process shall be required and provided to Council as this will affect the signage and access to the bay.	Removal of Sediments	Addressed in EIS Section 18.6 and Section 18.13	As committed to in EIS Section 18.6, a Remediation Works Environmental Management Plan (RWEMP) will be developed by the remediation contractor, including monitoring and mitigation measures and process for complaints handling. The remediation works have been managed to prevent the release of odours where possible rather than simply mitigating odour following release. In addition, as outlined in EIS Section 18.13, successful completion of the remediation works will be confirmed through the independent preparation of a Validation Sampling Analysis and Quality Plan (VSAQP). A site validation report will be prepared following the completion of the remedial works and reviewed by the Site Auditor. A copy of the completed report will be provided to Council. <u>Site Reinstatement</u> 1. Noted. <u>Complaint Management and Community Engagement</u> 1. Noted. SMP to be maintained throughout project. Biodiversity- A Water Quality Management Plan will be prepared. Conclusion- An Environmental Protection Licence (EPL) will be sort from the EPA for the works. The validation report will be reviewed by the Auditor and provided to the EPA at the completion of the remediation works.
		<u>Site Reinstatement</u> That the end use of the site is considered as part of this application.	Site Reinstatement		The final site reinstatement is at the core of the remediation process. The objectives of the project are to improve the health of the Bay and surrounding areas and ensure the long-term protection of the health of users of the Kendall Bay foreshore and recreational users of the waterway from potential impacts from gasworks-related contamination.
		<u>Community Engagement</u> That the stakeholder management plan including the communications plan is implemented	Community Engagement	Addressed in EIS Section 6.6 and Appendix 5.	Jemena will continue the established high level of community engagement described in EIS Chapter 6 throughout the remaining remediation and post remediation stages of the project.
		<u>Flora and Fauna</u> It is noted that an assessment is carried out however no protection measures are proposed (THIS IS NOT CORRECT). A condition that covers any damage is recommended. It is noted that a water quality management plan is discussed within the water and soil assessment and the proposal should be conditioned as part of any approval.	Flora and Fauna	Addressed in EIS Section 12.10 and Table 11-4	Kendall Bay biodiversity, flora and fauna will be protected through the implementation of the mitigation measures outlined in EIS Table 12-6 and Table 11-4, and through implemenation of additional mitigation measures within the CEMP and associated documents.
8	Port Authority of NSW Ryan Bennett 1/11/18	<u>Harbour Master approval</u> The written approval of the Harbour Master is required for any proposed works that will disturb the bed of a port or are otherwise captured by clause 67ZN of the <i>Ports and Maritime Administration Regulation 2012</i> (Regulation). Harbour Master approval will therefore be required in relation to any works associated with SSD 6701 that will disturb the bed of Sydney Harbour and Port Authority requests that a condition of approval is included to this effect. Port Authority notes and supports the recommended mitigation measures / controls in the Kendall Bay Navigation Study (section 7.5), particularly in regards to required consultation with the Harbour Master.	Harbour Master approval	Mentioned in EIS Section 16.7.3	Jemena confirm that they will obtain written approval from the Harbour Master for works that will disturb the bed of Sydney Harbour.

	9	Public-Stephen Matthews	Noise Please ensure that pile driving for the placement of the sheet piles does not commence before 0800 hrs.	Noise	Addressed in EIS Section 9.8	As per EIS Section 9.8, all works, including sheet piling will occur during the daytime period only. The City of Canada Bay Council have indicated the allowable work hours for the project as 7:00am to 5:00pm Monday to Friday and 8:00am to 1:00pm Saturdays, subject to confirmation from Council. No work will be undertaken on Sundays or Public Holidays. Consideration will be given to scheduling works at appropriate times within the allowable work hours, however efficient completion of works is also required to limit the duration of works. Respite hours will be considered during potential noisy portions of the work in consultation with the community. A Construction Noise and Vibration Management Plan (CNVMP) will be prepared for the project and will include monitoring to be undertaken and mitigation measures to limit the potential noise impact on the community.
		12/10/18 Unit 10, Breakfast Point, NSW, 2137 200 m west of SA1	Removal of Sediments Please ensure that all contaminated sediments in the vicinity of the mangroves are totally removed. We do not wish to go through this exercise and find that contamination remains within the mangrove area. No mangroves existed in the bay from the 1943 aerial photos so there would be an accumulation of contamination in the beach area now occupied by the mangroves. Perhaps consideration should be given to returning the bay to the 1943 status with no mangroves present as indicated in the attached pdf.	Removal of Sediments	Addressed in EIS Section 4.5	As stated in EIS Section 18.6, one of the primary objectives of the project is to remove any potentially contaminated materials and dispose of them offsite in order to meet the EIS objective stated in EIS Section 4.1, to ensure the long-term protection from potential impacts from gasworks-related contamination on the health of users of the foreshore of Kendall Bay. As suggested, consideration has been given to removal of all mangroves in the Southern portion of Kendall Bay. A previous proposal included removal of all mangroves and significant community concern was received opposing removal of the mangroves. This demonstrated that large portions of the community value the mangroves and are keen to preserve the mangroves where possible. A revision to the human health risk assessment (HHRA completed by EnRiskS, Appendix 3 of the EIS) was completed to retain the mangroves where possible. The revised HHRA accounts for leaving the main mangroves colony in-situ in remediation area SA3 and removal of one large mangrove and associated small offshoots in remediation area SA1. The contamination in SA1 is greater and therefore removal of the mangrove in this area is considered necessary. The presence of the mangroves limits potential exposure to sediments in SA3. Careful remediation of sediment in the upper profile around the mangroves in remediation area SA3 is proposed to prevent damage to the mangroves.
	10	Public-Bill Price	Air quality and odour The meeting with the Jemena company members provided a platform for local residents such as myself to be informed of the procedures intended to be employed on the remediation of sediment removal from Kendal Bay. The intended process was fully explained to me and assurances were given that any comments or concerns I had would be considered and dealt with in the management statement or considered to be included. As a resident who lives right on the river bank and facing the wharf where the offloading will take place my major concern is Odour. This point was discussed and assurances were given that Odour will be dealt with within the Management statement. With the definition of odour being clearly defined as foreign odour introduced in the offloading area, such as diesel fumes from motor running continual fumes and odours from the offloading vessels. To avoid continual disputes with complaining residents as demonstrated at the meeting. The question was raised by Member of the Jemena staff as how to define what an unpleasant or foreign odour is. It was agreed at the meeting that to avoid this type of dispute an Odour management statement should be prepared and provided to all surrounding residents explaining the following. : Foreign odours introduced in the offloading area that can be detected with a normal breath. : Diesel fumes and odours from offloading vessels from continual running of motors. : Odours that are clearly from the offloading sight transported from Kendal Bay,. : Any odour detected should be considered undesirable without verifying how strong or how bearable. : Immediate action should be taken by Jemena appointed agents to make the necessary changes to procedures responsible for any breach of the odour management statement,	Air quality and odour	Addressed in EIS Section 8.10	Thank you for taking the time to attend the community information session on 24 October 2018 and meet the project team. Management and mitigation of potential odour issues associated with the Project are a primary focus for the project team. An independent specialist assessment of air quality, including assessment of odour was completed by Todoroski Air Sciences and is included as Appendix 6 of the EIS. Chapter 8 of the EIS reviews the assessment completed by Todoroski and lists Jemena's key commitments to mitigate potential odour issues. A key commitment is to prepare and implement an Air Quality Management Plan (AQMP). The AQMP will include mitigation measures and monitoring with defined trigger levels for further action. The AQMP will be prepared following receipt of approval conditions from regulatory authorities (including the EPA). The AQMP is expected to be prepared early next year prior to the works beginning and further details of the plan can be provided once finalised. A key mitigation measure is to place odorous excavated sediment from Kendall Bay in bins which will then be sealed within Kendall Bay prior to transport to the Staging Site (140 Tennyson Road) for offsite disposal. The bins will be sealed throughout the transport to the Staging Site and will remain sealed until transported offsite by truck for disposal. This will greatly reduce the potential for odour at the Staging Site. Furthermore, no treatment is proposed at the Staging Site which will also reduce the potential for odour at the Staging Site. As you mentioned, Jemena is committed to hearing comments and/or concerns from the community and will maintain the following methods of communication through the project: - Kendall Bay Hotline 1800 571 972 - Kendall Bay email kendallbay@jemena.com.au - Kendall Bay website https://jemena.com.au/kendallbay
		26/10/18 65 Hilly Street, Mortlake, NSW, 2137 200 m north of staging site	As a very long term resident since 2002 in the immediate area, I am writing to object to this work proceeding. Over the last 16 years, I have witnessed the development of the Breakfast Point site by AGL, now Jemena, who have had 15 years to research and formulate a plan to world's best practice. As you can see from the attached map- I am one of the most affected residents by the Jemena work and will be severely impacted on a daily basis - not just the work times but 24x7x365 days for 1-2 years. Over the recent period of "testing" which went on for a number of weeks, the experience of trying to work from home, study for my Doctorate and live through this testing was not acceptable. This has given an excellent prelude into the likely effects of this work. Noise Excessive noise both in and out of hours. This extended to noise during work hours as the machinery was used that was beyond what was experienced in 16 years of Breakfast Point being built most likely due to proximity and being directly across the water. There was persistent metal to metal rubbing, most prominent after hours when the neighbourhood is usually very quiet, causing sleep to be disrupted several times a night. This is a tidal area and subject to small waves from the ferries. This is a foreseeable event that Jemena should have planned for and addressed. This leaves me with little confidence regarding their comments on noise. These noises were pervasive as my property is within 100m and located across water where sound waves bounce and echo. In addition it was winter so the doors were closed and I slept with noise reducing earplugs and still the noise would wake me several times a night. In summer I very much want the doors open and doubt that this will be possible during the day or night	Noise	Addressed in EIS Section 9.10	Management of potential noise impacts is a key focus for Jemena. A Construction Noise and Vibration Management Plan (CNVMP) will be developed to address potential noise impacts during the project, this will include monitoring and a process to address exceedances of noise criteria. The works will strictly adhere to standard construction hours and enforce respite periods if necessary. A vital part of the plan is to continue ongoing community engagement including complaints management. From our records we understand that you were in communication with Jemena during the recent trial works to stay informed of the progress and the expected completion date. Jemena will request that the remediation contractor investigate the potential source of the metal on metal rubbing noise that is described in your submission and identify measures that can be implemented to address the potential noise source/s. Jemena is committed to hearing comments and/or concerns from the community and will maintain the methods of communication outlined below through the project. - Kendall Bay Hotline 1800 571 972 - Kendall Bay email kendallbay@jemena.com.au - Kendall Bay website https://jemena.com.au/kendallbay
	11	Public-Leanne Ward	OBJECTION 28/10/18	Air quality and odour	Addressed in EIS Section 8.10	The potential for dust impacts are considered to be low given much of the remediation work will be conducted below the water level within Kendall Bay and excavated sediment will be saturated prior to placement in sealed bins for transport to the Staging Site. There is only potential for dust generation during processing given sediments will be saturated when placed on the barge and transported to the Staging Site, air quality modelling projects that dust impacts on surrounding receptors are expected to be negligible. To manage potential air quality impacts, an Air Quality Management Plan will be developed for the project and will include management and monitoring of potential dust impacts. The site supervisors will observe the works for potential dust impacts and implement mitigation measures as required.
		20 Kendal	Air quality and odour Excessive dust during recent testing has lead me to completely scrub down screens, windows and outside areas. This needs to be much improved so as not to cause unnecessary work or expense to residents.			

Private		Inlet, Cabarita, NSW, 2137 20 m east of SA4 Visual Amenity * Extensive and severe loss of visual amenity. During the recent tests this was most apparent including a loss of privacy into my work area and my bedroom from the platform. When I purchased the property in 2002, it was not with a view to having this erected outside my property for a proposed 1-2 years. I will most likely contemplate selling the property in this time and now I find that I will not be able to as the market price would be significantly reduced and the property unattractive to potential buyers. Jemena needs to consider how it will compensate residents while we are essentially captive the loss of visual amenity, which is the main selling point for any property on the waterfront. * On a previous occasion of testing, a barge was parked outside my property with flashing lights that I did ring up about when I got home but they were unable to do anything about. Again, this is foreseeable and was failed to be taken into account. Jemena has had adequate time to research world's best practice to get the impact of this work greatly reduced. A period of 1-2 years specified in various documents in unacceptably long and unnecessary compared to the scale and speed at which works can be done elsewhere, most notably around Asia. On the basis of both the impacts listed above and the unacceptably long timeframe, I do not support this work proceeding.	Visual Amenity	Addressed in EIS Section 15.4.6	The Project will require the establishment of temporary equipment and infrastructure during the course of the remediation works which will cause a temporary loss of amenity and some disruption of views of the Parramatta River and Kendall Bay. Once remediation works are completed and the Project infrastructure has been demobilised, the result will be an overall positive impact for the visual amenity of Kendall Bay, particularly in the beach and mangrove area of the southern area of the bay. Currently there are visual impacts on the southern beach area including coal and coke, these will be targeted during the remediation works. The communication methods described above will be maintained throughout the project and Jemena commit to responding to any complaints received. If there are any questions of complaints please contact us via these methods and we will investigate further and provide a response. The remedial method proposed has been refined over many years, taking into consideration community feedback and based on advice from industry experts. The remedial method (in situ stabilisation) selected for the highest impacted areas within the bay involves treatment of the sediment in the bay. This method has been selected following an extensive review of remedial options and was chosen as it achieves the remedial objectives while significantly reducing the potential impacts on the community. Treatment of the sediment in-situ reduces the volume of material to be excavated which reduces the potential for odour and the number of trucks required for off-site disposal. Solidification and stabilisation is viewed as the preferred method by the US EPA, particularly where remediation is immediately adjacent to residential areas (RAP, 2018). The remediation works within Kendall Bay are currently expected to take approximately 12 months, however given the complex nature of the marine environment a contingency of approximately 6 months has been applied (refer to Table 4-3 of EIS). An experienced remediation contractor will be engaged to manage the remediation works and the facilitate efficient completion of the works.
	12	Public-Peter O'Hara OBJECTION No date 405/1 Orchards Avenue, Breakfast Point, NSW, 2137 500 m west of SA2 Traffic I do not support the proposal and I would like to lodge a submission of objection about the Development Application. My ground for the objection is that removing the existing sediment and delivering the replacement fill by use of public roads is unreasonable. The following are my reasons: 1. Both Mortlake and Breakfast Point are now high-density residential areas. The residents of these suburbs were not involved in the pollution of Kendall Bay and therefore it is unreasonable that they have to bear the traffic of heavy vehicles for a period of between 18 months to two years from 7.00am to 6.00pm Monday to Friday and 8.00am to 1.00pm on Saturday. 2. The project already designates that the remediation works will use barges to transport materials to and from the sites in the bay to a staging area at the end of Tennyson Road. Instead of using the staging site and the end of Tennyson Road, these barges should instead proceed to an area further up the Parramatta River to the area around Duck River at Silverwater where there are already existing industrial sites with associated heavy vehicles. A staging site could be established in this area. The staging site would then only be 2 kilometres from Parramatta Road passing through industrial areas compared with the 4 kilometres when using Tennyson Road passing through wholly residential areas. 3. The project Traffic Impact Assessment estimates that there would be 10 heavy vehicle movements per day and that the impact was based on estimates assuming a speed of 10 kph. I have seen the 18 foot truck and dog rigs associated with building construction and also the WestConnex project. I have never seen the truck and dog rigs travelling at only 10 kph and I have always seen them travelling at the maximum allowable speed limit which again would cause a large impact on the tranquillity of the residential areas.	Traffic	Addressed in EIS Section 16.8	A detailed Traffic Impact Assessment (TIA) was undertaken by an independent specialist as part of the Environmental Impact Statement (Appendix 14 and discussed in Chapter 16 of the EIS). The TIA reviewed the road network to determine the most appropriate roadways to use during the project. The TIA also reviewed the expected traffic volume, with the Project expected to generate an average of 5 to 6 heavy vehicle movements per day, however this will vary from day to day and over various stages of the Project. Greater vehicle movements will be present during loading out of excavated material. Jemena acknowledge that traffic generated by the project is a key concern for local residents. One of the major benefits of the main remedial method selected (in situ stabilisation-ISS) is that it greatly reduces the number of truck movements required. ISS involves treatment of material within Kendall Bay and results in a reduced volume of material requiring off site disposal. A detailed assessment of alternative routes and a traffic impact assessment concluded that heavy vehicle movements generated by the Project will be less than 1% of the total vehicle traffic within the local road network at present. Traffic congestion is not expected and no disruption to bus routes or pedestrians is likely. Jemena has reviewed sites which could be used as the Staging Site for the remedial works and was fortunate that 140 Tennyson Road became available during this process. Jemena own 140 Tennyson Road for the sole purpose of providing a Staging Site for the remediation of Kendall Bay and the site contains unique facilities required for the project (i.e. Wharf, large storage space, close to Kendall Bay). The Staging Site needs to be as close as possible to Kendall Bay to facility safe and efficient completion of the works. Increasing the distance the barges are required to travel increase navigation risks and would result in a greater timeline for completion of the Project. An experienced remediation contractor will be engaged to manage the remediation works which will include close management of heavy vehicle drivers. Each driver will sit an induction and be informed of the Project expectations, including while driving within the Mortlake/Breakfast Point community. The increase in traffic from the Project will be minor, short term and will cease at the completion of the Project. A Traffic Management Plan will be developed for the Project and regular monitoring of the road undertaken. The Traffic Impact Assessment estimates the number of heavy vehicle movements based on the total volume of material to be imported and exported from the Staging Site and is therefore an average over the duration of the Project. The number of heavy vehicles movements will vary of the duration of the project and will be higher during off site disposal of material. The off site disposal of material is current estimated to take approximately 3-4 months. The proposed transport route will be reviewed in the updated Traffic and Pedestrian Management Plan to be prepared for the Project, including review of clearance.
	13	Public-Rod Jeffrey 31/10/18 309/9 Admiralty Drive , Breakfast point, NSW, 2137 40 m south of Seawall stability 1. Our lot is at the waterside end of Admiralty building and hence potentially one of the most affected by the remediation works if something goes astray. 2. I am also involved with the Community Association assets Sub Committee as well as a CA member and hence pay for B.Pt infrastructure maintenance including the waterfront walkway and the sea wall. Hence I have a strong interest in protection of the walkway and particularly the seawall which is my opinion, as a civil and geotechnical engineer, is potentially questionable to relatively minor surrounding /support changes. 3. I also attend the Jemena CLG meetings and was present at the one about 1 week ago. My issues raised below were nearly all raised at that meeting and there were verbally reported proposed sensible safeguards etc but many of those I had not seen in the documents and I do not have time to read the 100's of pages which in sum must reach 2,000 or more as a rough guess. Overall I am impressed by the recent communications by Jemena and more recently by Ventia. However I suggest any proposed safeguards etc must be in writing as a commitment. 4. My major concern is the potential destabilising of the sloping sandstone waterfront wall. I have concerns with the methodology proposed but also accept that Ventia has reported experience with a similar challenges. My concern is that the wall will be undercut when the local excavation in front is executed and extended to a reported 5 metres out from the wall face. [I agree the 5m is sensible]. I was told the methodology would involve a hit and miss excavation sequence and again I agree. Where I differ is that I consider the new ' clean ' backfill of broken rock and sand is potentially relatively compressible in a lateral sense compared to the existing rocks etc which have been insitu for decades and likely 'Locked ' into a relatively incompressible mass regarding wall toe 'kick out ' and hence protect against toe instability. If instability occurs then the soil / fill mass behind is almost certainly contaminated as it had not been included in the original remediation although there is the possibility the upper profile may have been excavated and replaced with ' clean ' soil. Anyway the repair of a slumped or locally collapsed wall would be an environmental disruption which must be avoided as well as the need to avoid the possible repairs requiring close off a waterfront walkway area to human access for safety and repairs. My suggestion is that the wall toe area works be completed by hit and miss as proposed but with say a 2m wide slot of 5 m length carefully excavated but then promptly backfilled with broken rock then in filled with a cement stabilised sand or similar so that it rapidly sets and essentially creates a near incompressible lateral toe support together with added erosion capability. Complete the stabilised 2 m or so wide buttress infills but with say a 0,5 or possibly 1m wide slot between which is backfilled as before but without stabilisation so that groundwater exit flows from inland and tidal backup can easily escape. This solution is not a particularly complex or costly change to current proposal but adds considerable safety to a wall displacement risk. 5. I am advised that a comprehensive wall dilapidation report is scheduled and I of course concur with this as essential before near wall works are commenced. However as a further safeguard I recommend that movement tell tales be installed at sensitive wall areas where they may be signs of erosion, cracking, movement and also in the area of first run of excavations to provide comfort or otherwise as to the methodology. A copy of the dilapidation report and other wall safeguards including wall buttress methods [as in item 4 above] to be submitted to the B. Pt. CA well before such works commence.	Seawall stability	Addressed in EIS Section 4.3.2	A primary focus of the remediation works is to preserve the integrity of the seawall. The remedial methodology adjacent to the seawall has been developed to reduce the potential for damage to the seawall. The work near the seawall will be done in small sections and geotechnical assessment/advice sought prior to the works and during the works as required. A pre-work dilapidation survey will be undertaken to record the state of the seawall prior to any remedial works. Given the management proposed to manage the seawall, no damage to the seawall is expected, however any damage will be repaired by Jemena contractor Ventia (in comparison to the dilapidation survey). Jemena agree that prevention of damage to the wall is far more favourable that repair and therefore significant preparation and consultation with geotechnical experts is being undertaken. The remedial method proposed notes that large foundation stones which are deemed critical for support of the wall will not be removed but rather cleaned and left in-situ. The final remedial design proposed adjacent to the sea wall with be development in consultation with geotechnical experts and documented in the Remedial Work Plan (RWP) to be prepared prior to beginning the full scale remedial works. A sea wall dilapidation survey will be completed prior to the remedial works beginning. A copy of the dilapidation survey can be provided to the BPCA upon request. Inclusion of movement tell tales will be considered as a potential monitoring method.

		SA3	Air quality and odour 6. A second area of concern that I have is the possible foul odour that may emanate from the remediation works especially during excavation works . I have read the Todoroski Air Sciences Report of 28/6/2018 and agree with all mitigation recommendations on their page 25 . However I believe some extra precautions are necessary . The first is that the excavator bucket when not being used should be hung below water level or inserted in a water filled large container to minimise risk of odour escape . Secondly there needs to be a monitoring program and a predetermined HOLD point if shoreline odour exceeds say EPA or other appropriate standards . 7. Another concern is that the depth of excavation seems too shallow for the beach area which is likely to be the more intensely occupied water edge area after remediation . I pass this comment since in the 15 years I have been regularly viewing the beach sand levels it has been evident that there have been episodes of major accretion and others of erosion . Hence the depth of excavation and clean sand backfill needs to match the interpreted maximum eroded depth plus a safety margin . The experts can answer what is wise but my past observation suggests that the current excavation proposal may be too shallow . 9. A somewhat all encompassing report was the Royal HaskoningDHV report of 21/5/2018 . My initial reading was to review the early page or two the conclusions on page 53 .The 6 lines of conclusion do not give me as a resident particular comfort as to management / mitigation measures as they only seem to be statements of report content . I also glance read the report and quite sensible and comprehensive recommendations were observed . However a more positive sign off as to the adequacy of those measures would give more comfort than the very brief conclusions . 10. I confirm that some of the issues above have reportedly scheduled by the contractor but my concern is that all are documented in case of an unfortunate event . I hasten to add that having seen the quality of remediation by Ventia at Neutral Bay Gasworks and by open conversations with them and Jemena at a series of meetings in the last year or so I do not come from a position of expecting any form of careless works . I come from an position of	Air quality and odour	Addressed in EIS Section 8.10	The remedial contractor are currently looking at options to enable the mixing head on the excavator area to be submerged in water during times of inactivity. An Air Quality Management Plan will be prepared for the project and will include monitoring to be undertaken and levels where further action is required. The AQMP will be prepared prior to the works following confirmation of feedback and conditions from regulatory authorities including the EPA. The depth of remediation within the Southern Remediation area has been developed following extensive assessment works undertaken by human health and ecological specialist. The proposed works also include installation of stormwater control measures in the Southern beach area to manage potential erosion (including extension of the sea wall, install of rock spurs and revetment blanket). The Royal Haskoning report was provided as Appendix 9 of the EIS. Jemena note that the conclusions provided in the report are brief, however we confirm that the recommendations presented in main body of the report have been considered when preparing the EIS and proposed remedial works. The comments contained in this submission will be provided to the remedial contractor for consideration.
		Public - Errol Dawes OBJECTION No date Breakfast Point NSW	Removal of Sediments The Bay has cleaned itself through time and should be left alone The beach is quite clean with fish and dolphins frequenting the Bay. Children play on the beach The remediation process should abandoned.	Removal of Sediments	Addressed in EIS Chapter 2	In 2004, the bed of the Parramatta River and Kendall Bay within 200 metres of the shoreline bordering the former Mortlake Gasworks was declared a 'Remediation Site' by the NSW Environment Protection Authority (EPA) after investigations carried out by AGL established that areas of sediments within the bay had been contaminated by gasworks activities. Jemena inherited AGL's obligations and responsibility for Kendall Bay contamination, following corporate transactions in 2006 and 2007. The rationale behind the remediation project are to satisfy EPA requirements. This will be achieved by removing contaminated sediments to ensure the long-term protection of the health of users of the Kendall Bay foreshore and recreational users of the waterway from potential impacts from gasworks-related contamination and improve the health of the Kendall Bay marine ecosystem in areas where it is adversely affected by acutely toxic gasworks contaminated sediments. Extensive investigations have been undertaken across Kendall Bay to determine which portions of the bay require remediation. The remediation areas have been identified following human health and ecological risk assessments.