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SSD 16-7628

14/8/17

Mr Dominic Crinnion
Team Leader, Ports and Water Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Crinnion

**Response to Submissions Report
Moorebank Intermodal Terminal Stage 2 Proposal MPE (SSD 16 - 7628)**

I refer to your email dated 31 July 2017 to the NSW Environment Protection Authority (EPA) seeking our review of the Response to Submissions (RTS) for the above proposal.

Please note that Liverpool City Council is the Appropriate Regulatory Authority for this Project under the Protection of the Environment Operations Act 1997. The EPA has agreed to assist council by providing comments and recommendations in relation to the key environmental issues of noise and vibration, and air quality.

The EPA has reviewed the RTS for the proposed development of Moorebank Precinct East (SSD 16 - 7628) dated July 2017, in relation to these key environmental issues. The EPA's comments and recommendations are attached (Attachment A).

If you wish to discuss any of the issues raised, please contact Rashad Danoun on 9995 6370.

Yours sincerely

A handwritten signature in blue ink that reads 'Sarah Thomson'.

SARAH THOMSON
Unit Head Metropolitan Infrastructure
NSW Environment Protection Authority

Encl. Attachment A – The EPA's review of the RTS for the proposed development of Moorebank Precinct East (SSD 16 - 7628) dated July 2017, in relation to the key environmental issues of noise and vibration and air quality.

Attachment A

NSW Environment Protection Authority (EPA) review of the Response to Submissions (RTS) for the proposed development of Moorebank Precinct East (SSD 16 -7628), dated July 2017

The EPA's comments focus on the key environmental issues of air quality, noise and vibration. The EPA has identified the site specific concerns outlined below.

Air Quality

As per the EPA's email to the Department of Planning and Environment (DPE) dated 2 August 2017, there are some information in regards to the Air Quality Assessment that erroneously were not submitted in the EPA's previous response to the Environmental Impact Statement (EIS) dated 27 February 2017. The EPA would like to request the proponent to consider and readdress the following concerns:

Assessment of construction

The EPA notes that the assessment of construction activities reflects that contained within the MPE Concept Plan Modification 2. As per EPA's advice on the Concept Plan Modification 2 (SSD 16_7628), it is not clear whether maximum daily operational intensity of the construction activities has been considered for the purposes of assessing against 24 hour impact assessment criteria. For example the assessment advises that emissions from hauling are based on an assumed capacity of each truck of 50 tonnes corresponding to approximately 26,400 trucks per annum. Based on this information and the proposed quantity of fill (1,320,000 tonnes) to be imported the averaging period for estimating emissions is likely to be based on annual average activity rates.

Where peak daily activity rates have not been used to estimate emissions, modelled impacts may have been under predicted.

The EPA recommends that the proponent provide additional information to demonstrate that maximum daily operation intensity of construction activities have been considered for assessing against 24 hour impact assessment criteria;

Assessment of Operation

The assessment of the operational phase of the proposal has considered emissions from warehouse traffic, mobile plant (forklifts), and warehouse heating/cooling assessed as natural gas boilers. In relation to emissions from vehicle movements the assessment is based on information and data contained in the traffic assessment. Review of the transport assessment and associated traffic modelling is beyond the scope of the EPA's review of the AQIA.

In relation to the assessment of emissions from natural gas boilers for heating/cooling purposes the assessment is based on generic assumptions rather than specific details on the size of any boilers that form part of the Stage 2 project. Specifically, emissions from natural gas boilers are based on an energy use intensity (150 MJ/m²/year), a warehouse footprint of 300,000 m² and emission factors. The proponent should be requested to provide further detail on the size and emission performance of boilers proposed for Stage 2.

Table 5-6 of the AQIA presents a summary of estimated emissions for operation of Stage 2 and is presented in tonnes/annum. However previous tabulated emission estimates (Table 5-3, Table 5-5) are presented in kg/annum. This is potentially a typographic error, however the proponent should be request to check and confirm the emission estimates and revise the AQIA where the inconsistency is likely to effect the outcomes of the assessment.

The EPA recommends the proponent:

- **provide additional information on the size of any natural gas boilers proposed;**
- **benchmark the emission performance of any boilers against best practice; and**

- **confirm the emission estimation for the operational assessment noting the differences in reported units of measurement for emission rates in Table 5-6 and Tables 5-3 & 5-5.**

Noise and Vibration

The EPA considers the responses provided in the RTS adequately address the EPA's comments with respect to noise as raised in our letter to DPE dated 27 February 2017.