



Your reference SSI 6878
Our reference: DOC15/449448
Contact: Peter Morrall 9995 6810

Daniel Gorgioski
Planning Officer
Department of Planning and Environment
GPO BOX 39
SYDNEY 2001

Dear Mr Gorgioski

SSI 6878 – Albion Park Rail Bypass

I refer to the request from the Department of Planning and Environment (DP&E) to the Environmental Protection Authority (EPA) (your reference SSI 6878), to provide comments on the Environmental Impact Statement (EIS) for the above project.

The EPA has reviewed the EIS and provided comments and recommendations in relation to the conditions of approval for the key issues of air and water quality and noise (see attached).

If you wish to discuss any of the issues raised in this letter, please contact Peter Morrall on 9995 6810

Yours sincerely

A handwritten signature in black ink, appearing to read 'P Morrall', followed by the date '27.11.15'.

PETER MORRALL
A/Unit Head Metropolitan Infrastructure
NSW Environment Protection Authority

Encl. EPA's submission on the Environmental Impact Statement for the Albion Park Rail Bypass Project (SSI 6878)

EPA's submission on the Environmental Impact Statement for the Albion Park Rail Bypass (SSI 6878)

NOISE AND VIBRATION

Local Roads

The EIS states "the local road network would need to be used for: ▫ Hauling materials from quarries and borrow sources to work areas ▫ Hauling materials from one section of a work area to another ▫ Providing access for the delivery of all construction materials and consumables ▫ Providing access for the workforce to the various locations along the project, particularly to the project laydown areas and project site office."

Recommendation

The EPA recommends that heavy construction vehicles do not use the local road network where possible and that alternate options are investigated.

Extended Construction Hours

Community concerns may arise from noise impacts associated with extended construction hours during the summer months.

Recommendation

The EPA recommends that construction hours are restricted to standard hours unless permitted by an Environment Protection Licence. As the construction phase of the project will require licensing by the EPA, it would be appropriate for the EPA to negotiate any extended construction hours with the licensee.

Queuing and idling construction vehicles

Community concerns may arise from noise impacts associated with the early arrival and idling of construction vehicles at the development site and in the area surrounding the site.

Recommendation

The proponent be required to ensure construction vehicles do not arrive at the project site or in surrounding areas outside approved construction hours.

Reversing and movement alarms

The EPA has identified the noise from 'beeper' type plant movement alarms to be particularly intrusive and is aware of feasible and reasonable alternatives. At other projects several contractors have undertaken safety risk assessments of alternatives to the traditional 'beeper' alarms. Each determined that adoption of 'quacker' type movement/reversing alarms instead of traditional beepers on all plant and vehicles would not only maintain a safe workplace but also deliver improved outcomes of reduced noise impacts on surrounding residents. Interim Construction Noise Guideline Appendix C provides additional background material on this issue.

Recommendation

The proponent be required to undertake a safety risk assessment of construction activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.

Recommended Condition of Consent

Noise and vibration control measures must be developed and managed in accordance with:

- The Interim Construction Noise Guideline (2009);
- Assessing Vibration: a technical guideline (2006);
- NSW Road Noise Policy (2011)

AIR QUALITY

Off-road diesel plant

Recommendation

The environmental impacts associated with off road diesel equipment can be a major source of fine particles. The EPA recommends that the proponent assess the environmental impacts associated with heavy vehicles including off road diesel equipment and plant used in the construction of the project. This should include but is not limited to:

- Compliance with relevant and current emission standards as prescribed in Australian Design Rules for heavy duty engines and vehicles.
- Strategies for minimising air emissions from off road diesel equipment including but not limited to graders, bulldozers, loaders etc.
- Confirmation that all off road diesel equipment will meet best available diesel emissions standards or be fitted with an appropriate diesel exhaust treatment device where possible.

The EPA recommends the unnecessary idling of engines be further reduced. Diesel plant engines should be turned off when not in active use and truck engines should be turned off during periods of inactivity and while waiting to load or unload material for three minutes or more.

DUST

The proponent must ensure that during the construction phase of the project all works are undertaken by such means as may be necessary to minimise dust emissions on the premises and to minimise the release of dust from the premises. This includes:

- Proactive controls to help ensure that the project does not cause exceedances of relevant particle impact assessment criteria.
- Reactive management strategies to ensure that the project impacts are acceptable under adverse conditions, including adverse weather or elevated background concentrations.

Recommended Condition of Consent

The proponent must ensure that construction work is carried out by such practicable means as may be necessary to minimise dust emissions on the premises, and prevent dust emissions from the premises.

WATER QUALITY

Erosion and sediment control measures should be developed and managed in accordance with Managing Urban Stormwater Soils and Construction, 4th Edition published by Landcom (the 'Blue Book') and Volume 2D Main Road Construction published by DECC (2008). Volume 2D advises that main road construction requires a stronger emphasis on some management principles, particularly:

- *erosion control as a pollution prevention strategy*
- *runoff separation by diverting 'clean' stormwater runoff around the site or away from operational areas*
- *management and maintenance of long-term controls.*

Recommended Condition of Consent

- Erosion and sediment control measures must be developed and managed in accordance with Managing Urban Stormwater Soils and Construction, 4th Edition published by Landcom (the 'Blue Book') and Volume 2D Main Road Construction published by DECC (2008).

Recommended Condition of Consent

The Proponent shall not cause or permit any waters to be polluted, as defined under Section 120 of the POEO Act.