

DOC17/333398-08 SSI7400 Mod 2

> Mr Mick Fallon Senior Planner - Transport Assessments Department of Planning and Environment mick.fallon@planning.nsw.gov.au

Dear Mr Fallon,

Sydney Metro City and Southwest (Chatswood to Sydenham) Modification 2 - SSI 7400 Request for EPA comment

I refer to the request from the Department of Planning and Environment (DPE) to the NSW Environment Protection Authority (EPA) dated 19 June 2017 to undertake a review of the proposed modification to the Sydney Metro City and Southwest (Chatswood to Sydenham) rail project SSI7400 Mod 2.

The EPA has reviewed the modification report and our comments are provided in Attachment 1. The EPA considers that the project approval conditions are appropriate for the proposed modification, but recommends that further, detailed assessment into contaminated soil and water management and noise impacts be undertaken.

If you have any questions regarding this letter, please contact Claire Miles, Operations Officer Metropolitan Infrastructure on 9995 5167 or at Claire.miles@epa.nsw.gov.au

Yours sincerely,

JACINTA HANEMANN

Regional Manager Operations - Metropolitan Infrastructure

2/8/2017

NSW Environment Protection Authority

Contact officer: CLAIRE MILES

9995 5167

Attachment 1

Contaminated Soil and Water

It was identified that the proposal may increase the risk of exposure to potentially contaminated soils and vapours associated with the railway use within central station during construction. The water table may also be encountered during construction of the underground walkway.

Other potential sources of contamination are derived from the former site uses as a cemetery and a gasworks, and leachate from the fill material used in Prince Alfred Park (up-hydraulic gradient from the proposed walkway).

A review of sites within 500m of the proposed work that have been notified to the EPA as potentially contaminated or declared as significantly contaminated found:

- one site approximately 200m to the North-north-east Ausgrid Road Reserve (regulation no longer required)
- one site approximately 200m to the east Legion Cabs (trading) Cooperative (under assessment)

These two sites are not considered likely to present a potential contamination source at the proposed Central Walk site.

A hazardous materials register was updated during the site walkover for this assessment. The register identifies asbestos containing materials, lead paint and dust, synthetic mineral fibres and PCBs in fluorescent light fittings.

Contaminated Land Risk Assessment and Risk Classification

In the Main Report, Table 18-2 provides a qualitative risk assessment for the potential of each identified potential source to have contaminated the soils and groundwater on the site. This assessment appears appropriate for this stage in the investigation, but further investigation into the presence of contamination on the site is required.

Recommendations

The EPA recommends the following general conditions:

- 1. The processes outlined in State Environmental Planning Policy 55 be followed in order to assess the suitability of the land and any remediation required in relation to the proposed use;
- 2. Where any contamination which meets the trigger in the Guidelines for the Duty to Report Contamination (www.epa.nsw.gov.au/resources/clm/150164-report-land-contamination-guidelines.pdf) is encountered, the contamination should be notified in accordance with requirements of section 60 of the CLM Act;
- 3. The proponent must ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site so as to result in significant contamination [note that this would render the proponent the 'person responsible' for the contamination under section 6(2) of CLM Act].
- 4. The following guidance should be considered accordance with the proposal:
 - Technical Note: Investigation of Service Station Sites;
 - NSW EPA Sampling Design Guidelines www.epa.nsw.gov.au/resources/clm/95059sampgdlne.pdf
 - Guidelines for the NSW Site Auditor Scheme (2nd edition) 2006 http://www.epa.nsw.gov.au/resources/clm/auditorglines06121.pdf
 - Guidelines for Consultants Reporting on Contaminated Sites, 2011 www.epa.nsw.gov.au/resources/clm/20110650consultantsglines.pdf

 The National Environment Protection (assessment of contamination) Measures 2013 as amended.

The EPA considers that the conditions applying to the approved project (E66-E70) are appropriate and should apply to the modification.

Noise

Background predictions, impacts, methodology

The EPA notes that not there was incomplete information in the report; for example, not all noise monitoring locations are shown on Figure 11-2 and the inclusion or absence of some entries in Table 11-3, 11-6, 11-7 and 11-12 is unclear.

However, the measured noise levels are consistent with EPA's expectations for the urban area around Central Railway Station and the predicted levels are consistent with EPA's experience of similar construction projects, indicating that the noise modelling is suitably accurate.

Mitigation measures

The EPA considers that the conditions applying to the approved project are appropriate and should apply to the modification.

In addition, the proponent has undertaken to further investigate opportunities to minimise heavy vehicle movements on Randle Lane at night and to also implement a number of measures to reduce workplace noise exposure of station workers, retail staff and members of the public.

The EPA recommends a condition be added to the approval requiring the proponent to maximise as much as practicable the use of work trains to minimise heavy vehicle movements.

The EPA is aware of impacts occurring on major infrastructure projects through a lack of coordination between infrastructure contractors and agencies conducting maintenance on essential utility services. This has resulted in out-of-hours works causing noise impacts when respite periods have been planned. The EPA recommends that conditions of approval be added requiring a Utility Management Coordination Agency and development and implementation of a Utility Management Strategy.