Our reference: DOC15/197862-04

Mr Andrew Beattie
Senior Planner, Rail, Ports & Water
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Beattie

RE: Request for Review of Environmental Impact Statement for SIMTA Stage 1 – Intermodal Terminal and Rail Connection, State Significant Development (SSD - 6766) - Moorebank Avenue, Moorebank, Liverpool LGA

I refer to your request dated 26 May 2015 to the NSW Environment Protection Authority (EPA) to review the Environmental Impact Statement (EIS) for the above development in regard to the Secretary's Environmental Assessment Requirements (SEARs).

The EPA understands that the Stage 1 Proposal includes an intermodal terminal facility, rail link and sidings, container storage and loading areas, administration facility and ancillary works.

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

The EPA has reviewed the SIMTA Intermodal Terminal Facility – Stage 1 EIS for adequacy against the SEARs. The EPA's review of the EIS focused on aspects relating to noise and air quality. The EPA is also concerned about the proposed routing of the Central and Southern Rail Links through the Glenfield Landfill and has accordingly provided comment.

It is noted that the concerns raised in the EPA's review of the Concept Plan – Revised Environmental Assessment for SIMTA Intermodal Terminal Facility – MP10_0193, (dated 25 October 2013), the EPA's input to the SEARs (dated 17 November 2014) and the EPA's review of the draft EIS (dated 25 May 2015) have generally been addressed. However, the EPA again reiterates the importance of a thorough assessment of potential impacts of the proposed routing of the Central and Southern Rail Links through the Glenfield Landfill.

The EPA's key recommendations are attached to this letter (Attachment A).

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If you wish to discuss any of the issues raised in this letter, please contact George Orel on 9995 6849.

Yours sincerely

2-7-15

FRANK GAROFALOW
Manager Infrastructure
Environment Protection Authority

Encl. *Attachment A – The EPA's recommendations regarding the Environmental Impact Statement in regard to the Secretary's Environmental Assessment Requirements for the, SIMTA Stage 1 – Intermodal Terminal Facility, Moorebank Avenue, Moorebank, Liverpool LGA Development.*

Attachment A

EPA recommendations regarding the Environmental Impact Statement, in relation to the SEARs for the SIMTA Stage 1 – Intermodal Terminal Facility, Moorebank Avenue, Moorebank, Liverpool LGA Development.

In assessing the content of the Environmental Impact Statement (EIS) for the SIMTA Stage 1 – Intermodal Terminal Facility in respect to the Secretary's environmental assessment requirements (SEARs) recommendations, the NSW Environment Protection Authority (EPA) has identified the following site specific concerns based on the information provided by the Department of Planning and Environment (DP&E) in its letter dated 26 May 2015.

Construction and Operational Noise and Vibration

The EPA has reviewed the Noise and Vibration Impact Statement (NVIS) for the SIMTA Intermodal Terminal Facility – Stage 1 project at Moorebank.

The SEARs for the project are generally adequately addressed, with the exception of the issues described below.

Rail noise impacts

The EPA notes that:

- Rail noise on the link was modelled using the NORDIC Rail Traffic Noise Prediction Method (Kilde 1984).
- The Environmental Impact statement stated that five train movements in each direction between the terminal and Port Botany would occur each day.
- The SIMTA rail access report (2015) states that the northbound rail link was designed to allow 1800m long trains to depart and clear the SSFL at 60km/h. The design speed for the southbound link is 35 km/h.
- However, the Noise & Vibration Impact Assessment assumed that trains on the rail link would be travelling at between 25 and 45 km/h (less than the design speed).
- Including curve corrections to noise predictions, the Noise & Vibration Impact Assessment predicted the rail link would contribute:

Location	Locality	$L_{Aeq(period)}$ (dB)	L_{Amax} (dB)
NCA1	Wattle Grove south of Anzac Road	44	67
NCA2	Wattle Grove north of Anzac Road	34	56
NCA3	Casula residential	51	81
NCA4	Glenfield residential	44	67
S1	All Saints Catholic Senior College, Casula	47	72
S2	Casula Powerhouse	41	64
I1	Defence National Storage and Distribution Centre, Moorebank	38	62

- The Noise & Vibration Impact Assessment stated that curve corrections were +3 dB for curves between 300m and 500m radius, and +8 dB for radius less than 300m.
- Curve corrections added 4 to 6 dB to the $L_{Aeq(period)}$ and 6 to 9 dB to the L_{Amax}.
- The Noise & Vibration Impact Assessment proposed that a Rail Noise Management Plan should be developed to include procedures for application of friction modifiers and noise monitoring.
- The EPA notes that the project's "Best Practices [sic] Review" recommended that the project should use locomotives meeting the network requirements, bogie cross-bracing, grinding "in accordance with TfNSW requirements" and an automatic track lubrication system. The review stated that use of genset-type locomotives was not justified.
- The Environmental Impact Statement said that best practise wagons were not feasible as SIMTA "may not control rail wagons".
- Short term monitoring will be used to monitor the effectiveness of lubrication.
- The Environmental Impact Statement said it was not practical to install an angle of attack monitoring system to manage curve squeal as SIMTA will have limited control over which rolling stock can access the site.
- The Noise & Vibration Impact Assessment did not quantify the impact of additional traffic from the project on the rail network.

The EPA considers that detailed design of the rail link should maximise curve radii where practicable.

All feasible and reasonable mitigation measures should be implemented for the rail link

- Predicted $L_{Aeq(period)}$ noise levels from the rail link exceeded criteria in three out of four residential sensitive receiver areas.
- Predicted L_{Amax} noise levels from the rail link exceeded the sleep disturbance screening criteria (49 to 52 dB) at all residential sensitive receiver areas. At Casula the predicted L_{Amax} was 81 dB.
- Sleep disturbance impacts should be assessed in detail according to the Application Notes – NSW Industrial Noise Policy which can be found at: http://www.epa.nsw.gov.au/noise/applicnotesindustnoise.htm
- The measures recommended in the "best practice review", including use of bogie cross-bracing, grinding and an automatic track lubrication system are appropriate mitigation measures for noise from the rail link.
- Additional measures should include top of rail friction modifiers, locomotives with the lowest practicable sound power levels, and steering, permanently-coupled "multi-pack" wagons.
- More mitigation measures should be committed to by the proponent, or be required by conditions of approval, if DP&E decide to approve the project. The EPA recommends that for those locations where it is not possible to meet the required noise level criteria, mitigation measures such as noise walls, or architectural treatments should be implemented.

Operational noise impacts excluding rail

- CONCAWE category 6 was used for the adverse meteorology scenario in operational noise modelling which is the highest (worse case) category available in the CONCAWE algorithms.
- Container handling was assumed to be by diesel reach stackers rather than electric rail mounted gantries.
- Locomotives were assumed to be running (idling) all the time, even when stationary (for about 3 hours a visit).
- $L_{Aeq(night)}$ predictions assumed that adverse meteorology occurred for 5 hours a night.

- The adopted operational noise criteria, including the screening criteria for sleep disturbance, were lower than for the MIC intermodal project. This is because the measured background noise levels were lower for the MIC intermodal project.
- All $L_{Aeq(period)}$ predictions were less than 35 dB and all $L_{Aeq(15min)}$ operational noise predictions were less than or equal to 39 dB. Operational L_{Amax} levels (excluding the rail link) were predicted to be up to 48 dB.
- Quarterly noise monitoring was proposed for the first year.
- The Environmental Impact Statement stated that broadband reversing alarms were not feasible and reasonable as SIMTA does not control the truck fleet. The EPA considers that SIMTA does have control over requirements for entry to site. The EPA recommends that a risk assessment be undertaken to determine if non-tonal reversing alarms can be fitted as a condition of site entry. Alternatively site design may include traffic flow that does not require or precludes reversing of vehicles.
- The Environmental Impact Statement stated that the proposed throughput did not warrant using hybrid or electric container handling equipment.

Best practise plant should be used for container handling

- Operational $L_{Aeq(15min)}$ noise levels from the project, excluding rail link, were 1 dB lower than the criteria at Casula under adverse meteorological conditions.
- The predicted noise levels from the project may place constraints on future expansion of the site. The EPA recommends that best practise plant be used for the project, including electric automated container handling equipment, to minimise noise impacts and avoid unnecessary noise constraints on future stages of the terminal. It is generally easier to implement quieter technologies from the beginning of a project.

Construction noise should be managed through a Construction Noise Management Plan, and night time construction may require respite

- The predicted noise levels are higher than the Noise Management Levels adopted for the adjacent MIC intermodal project, but lower than the Noise Management Levels adopted in the Noise & Vibration Impact Assessment. The difference in Noise Management Levels is due to a difference in the measured background noise levels for each project, which should be explained by SIMTA.
- No construction noise was predicted above the adopted Noise Management Levels for this project (SIMTA). The predicted noise levels are lower than the 'highly noise affected' Noise Management Level.
- The maximum predicted construction noise $L_{Aeq(15min)}$ at any residential receiver was 44 dB.
- The Noise & Vibration Impact Assessment suggested a Construction Noise and Vibration Management Plan will be implemented.
- A Construction Noise and Vibration Management Plan is appropriate for managing the predicted construction noise impacts during the day time (standard hours).
- Department of Planning and Environment should consider additional mitigation measures for construction noise outside of standard hours, including respite periods.

Noise from the additional traffic generated on the Southern Sydney Freight Line should be quantified

- Environmental Assessment Requirements included assessment of the impacts of project traffic on the Southern Sydney Freight Line, taking into account the Rail Infrastructure Noise Guideline.
- The Southern Sydney Freight Line is likely to require upgrades to take project traffic, and future noise mitigation on the line may attenuate noise from traffic generated by the project.

- The impacts of the proposal on network rail noise, including from the Southern Sydney Freight Line, should be quantified in accordance with the Rail Infrastructure Noise Guideline.

Recommended Conditions of Concept Approval

The EPA recommends that the proposal should be include conditions of consent requiring the following.

1. Best practise plant for both the import/export terminal and interstate terminal, to minimise noise levels, including electric automated container handling equipment or equipment with equivalent sound power levels;

2. All feasible and reasonable mitigation measures for the rail link, including automatic lubrication and top of rail friction modifiers.

3. Only best practise rolling stock to access the terminal to or from Port Botany, including locomotives with the lowest practicable noise levels, and steering, permanently-coupled "multi-pack" wagons.

4. A detailed assessment of sleep disturbance impacts, including: how often noise events occur; the time of day when they occur; whether there are any times of day when there is a clear change in the noise environment and appropriate noise mitigation measures where required;

5. A risk assessment be undertaken to determine if non-tonal reversing alarms can be fitted as a condition of site entry. Alternatively site design may include traffic flow that does not require or precludes reversing of vehicles;

6. For those locations where it is not possible to meet the required noise level criteria, mitigation measures such as noise walls, or architectural treatments should be implemented; and

7. A Construction Noise and Vibration Management Plan.

All additional feasible and reasonable mitigation measures for construction works outside standard hours, including providing respite periods where appropriate.

Contaminated land

The EPA has not completed a detailed review of the adequacy of the SIMTA Intermodal Terminal Facility – Stage 1 - Phase 2 Environmental Site Assessment and Remediation Action Plan prepared by JBS&G Australia Pty Ltd or contamination section of the draft EIS. It is noted, however, that the reports have undertaken to address the requirements of the SEARs.

The EPA recommends that a site auditor accredited under the *Contaminated Land Management Act 1997* be engaged to issue a Section A Site Audit Statement in relation to the proposal. The subject area has had a range of land uses over the years which have resulted in groundwater contamination including the presence of PFOS, TCE and petroleum hydrocarbons. The presence of these contaminants allows for potential off-site migration of contaminated groundwater and vapour intrusion risks for the development.

Proposed Rail Access - Routing of the rail link through the Glenfield Landfill

In addition to assisting Council by providing comments and recommendations in relation to the key environmental issues of noise and air quality, the EPA has included comments regarding the proposal's impact on landfill infrastructure, pollution control and environmental monitoring associated with the Glenfield Waste Facility operated by Glenfield Waste Services under environment protection licence no. 4614.

The EPA acknowledges that no detailed investigation of impacts on the landfill have yet been undertaken by the proponent. The EPA will therefore not be in a position to assess the impacts of the rail link on the Glenfield Waste facility until such time as a detailed impact assessment including mitigation strategies has been undertaken and the results of such presented in various sub-plans.

The EPA will not support approval of the southern rail access option until such time as the proponent is able to clearly demonstrate to the EPA that the construction and operation of the rail link will not compromise the effectiveness of the landfill pollution control and monitoring systems (i.e. leachate, landfill gas and surface drainage) at the Glenfield Landfill licensed premises, including future post-closure care measures.

Nevertheless, where the EPA has deduced that impacts on the landfill are likely the EPA has provided suggested conditions of approval for the DP&E to consider placing into any consent that the Department chooses to issue for the proposal.

Impact on landfill leachate and gas containment

The EIS states that the proposal will either not impact on any former landfill cells (Page xxxv Geotechnical and Soil) or is not intended to disturb or compromise landfill lining or systems (Page xxxvi Contamination). However design drawings in "Appendix F - Rail Access Report" indicate that substantial battering of slopes to support the rail line are required. Where these batters will impact on cell voids (empty, partially filled and filled) the proponent should have described the existing landfill liner (if installed at this location), the impact of installing batters at these locations and whether new lining will be required.

The EPA cannot support the construction of a rail corridor within the Glenfield Waste Services premises until such time as there is sufficient information to assess whether the proposal will impact on the landfill containment systems specifically gas and leachate controls. The proponent was required in the Secretary's Environmental Assessment Requirements (SEARS) to assess the impacts of the rail link on the Glenfield Waste facility in consultation with the EPA, yet formal consultation has not yet successfully taken place. Lastly, the proponent has not provided a methodology to ensure the landfill containment system retains its integrity during and after construction, also required by the SEARS.

Asbestos

Asbestos fibres can pose a serious health risk to humans if inhaled. The EPA notes that Glenfield Waste Services is licenced to receive asbestos waste. The *Protection of the Environment Operations (Waste) Regulation 2014* requires operators of landfills licenced to receive asbestos to bury it in accordance with the regulation. However, operators are not required to record the locations of buried asbestos waste in landfills, therefore there is a reasonable possibility that if earthworks are required within previously landfilled cells, asbestos fibres could be encountered and liberated.

The EPA cannot support any proposal that has the potential to disturb landfilled waste because the proponent has not detailed specific mitigation strategies to prevent the release of asbestos fibres of which there is a reasonable possibility that such fibres are contained within previously landfilled waste. The proponent has committed to producing an Asbestos Management Plan within the Contamination Management Plan which will be included in the Construction Environmental Management Plan which have either not been presented or not been finalised at the time of exhibition of the EIS.

Leachate

Impacts on leachate and the leachate management and barrier system other than the leachate pond should be considered in the EIS in the event that landfilled waste is excavated during earthworks. If any landfill cap is compromised and water or other liquid is allowed to enter a landfill cell the volume of leachate may increase in a landfill cell. Leachate levels should be kept low in a cell to prevent impacts on surrounding groundwater and gas production. The infiltration of liquid into previously landfilled waste could be experienced in the event that a landfill cap is compromised. Conversely, if any liner is breached during piling or earthworks, leachate may be released into surrounding groundwater.

The EPA cannot support any works that have the potential to disturb the landfill cap or barrier system such as excavation or piling because the proponent has not detailed mitigation strategies to deal with leachate and the leachate management and barrier system. The proponent has committed to routine monitoring of leachate and groundwater levels in a Contamination Management Plan to be included in a Construction Environmental Management Plan which were either not presented or in "preliminary" form at the time of exhibition of the EIS. Further, the EPA is concerned that there is no commitment to monitor leachate and groundwater into the future to determine if the proposal is having an ongoing impact.

Gas

Landfill gas management has not been adequately addressed in the EIS. The EPA recognises that impacts on gas management and explosive risks may be incurred as a result of works on or even near landfilled waste. Landfill gas is high in methane and is known to travel in both vertical and lateral directions underground for several hundreds of metres sometimes accumulating in structures and posing an explosive or asphyxiate risk if not managed properly. Methane is also a powerful greenhouse gas and may cause unnecessary environmental damage if vented to the atmosphere uncontrolled. Landfill gas often contains odorous components that can impact on local amenity, generating odour complaints.

The EPA cannot support any works which have the potential to increase, facilitate movement, accumulate or release landfill gas because the proponent has not adequately detailed impacts or mitigation strategies to avoid occupational or environmental impacts. Potential for the release of Greenhouse Gases or for the movement and accumulation in structures resulting from excavations within or near the landfill and have not been considered in the EIS and it is the position of the EPA that these hazards pose a threat to human health, safety and the environment. In addition to field screening and personal monitoring the proponent should address design of any new structures near the landfill and remedial/containment measures should venting of gas be discovered during construction.

Exhumed waste

Unless approved by the EPA, waste exhumation is specifically prohibited under condition O4.5 of environment protection licence 4614 held by L.A. Kennett Enterprises Pty Ltd. Exhuming waste can lead to amenity, health, soil water and air impacts. The proponent should assess whether waste exhumation is necessary, and if so detail predicted timeframes for exhumation, disposal options and mitigation measures to prevent impacts. The licensee (L.A. Kennett Enterprises Pty Ltd) should be made aware that the licence may need to be varied if waste needs to be exhumed.

The EPA cannot support any activities that involve the disturbance or exhumation of landfilled waste because it is prohibited by Environment Protection Licence 4614 and because the proponent has not provided enough information to make an assessment of the impacts.

Contaminated stockpiles

Bore hole investigations undertaken by the proponent indicate that contamination exists in the form of Lead and Zinc. Data also shows that that other contaminants were present including "rubble, concrete, plastic, glass and wood" in fill material underlying the proposed rail link. The potential for excavated contaminated soils to impact on the local environment have been conceptualised in Figure 2 Page 285 of the EIS.

The EPA cannot support any stockpiling of contaminated materials as part of the proposed Rail Link as the proponent has not addressed all potential impacts to the environment from the excavation of potentially contaminated soils in this area. The RAP does not adequately address these in its current form.

Integrity of monitoring points

Table 4-4 on Page 48 of the EIS states that there is potential for the relocation or removal of 7 monitoring wells in the Glenfield Waste Facility. Environment protection licence 4614 requires regular monitoring of

environmental pollutants at specific locations. If this monitoring is not undertaken for any reason this may constitute an offence against the licensee. Should the proponent require that monitoring points to be moved the process for undertaking this and the required negotiations with the operator of the Glenfield Waste Facility should be identified in the EIS.

The EPA cannot support the relocation or removal of any monitoring points associated with the operation of the landfill within the Glenfield Waste Services premises because the proponent has not provided specific detail on points to be relocated or removed.

Access to points for monitoring

Pages 475 and 482 indicate that ongoing access to the Glenfield Waste Facility and surrounding infrastructure would be maintained however the construction of a Rail corridor of 20 metre width and establishment of necessary property rights over the land may impede access to essential landfill monitoring points associated with the landfill.

The EPA cannot support the construction of a 20 metre wide rail corridor within the Glenfield Waste Services premises because the Proponent has not detailed enough information to assess the impacts on the licensee's access to monitoring points, leachate and stormwater controls which are essential for the proper functioning of the landfill.

Proposed Conditions of Consent relating to routing of the rail link through the Glenfield Landfill

Should the DP&E decide to grant approval for the Rail Link as part of the proposal, prior to receipt of this information, the EPA strongly recommends that the following conditions be included as part of the development consent.

8. The proponent must prepare a detailed assessment of the impacts on the Glenfield Landfill licensed premises. The assessment must include, but not be limited to:

    a. Targeted intrusive investigations to determine contamination pathways and to develop mitigation, management and/or remediation options based on those investigations.
    b. Details of the quantity of landfilled waste to be removed, the location from where it will be removed, the methodology to be utilised and the estimated timeframe for the removal and reburial.
    c. Proposed measures to mitigate odour impacts on sensitive receivers, including application of daily cover to any exposed waste in accordance with benchmark technique 33 of the *EPA's Environmental Guidelines: Solid Waste Landfills, 1996*.
    d. Details of impacts on pollution control and monitoring systems including existing groundwater and landfill gas bores and their subsequent repair or replacement.
    e. The methodology proposed to ensure that where the landfill barrier system disturbed, it is replaced or repaired to ensure its ongoing performance. The proponent should detail matters such as sub grade preparation and specifications, liner installation/reinstallation procedures and construction quality assurance (CQA) procedures.
    f. An overview of any access and materials or equipment storage arrangements with the Glenfield Landfill in relation to the construction of the project, and operation and maintenance of the rail link.
    g. Details of any other expected or potential impacts to the licensed area and options for management and mitigation of those impacts (i.e. leachate management and surface water runoff, potential impacts on the Georges River during works, dust etc.).
    h. Details of and proposed mitigation measures for the long term management of the rail link. A permanent rail link across the landfill is likely to have long term impacts that need to be considered and mitigated (e.g. subsidence or gas issues).

9. The proponent must provide the assessment report to the EPA for review and approval at least three months prior to commencement of construction (including early works). No works are permitted to commence within the Glenfield Landfill licensed premises without the EPA's written approval.

10. The proponent must provide the EPA with any construction design plans for review and approval prior to commencement of the Rail Link construction (including early works).

11. The proponent must prepare a construction and operational management plan specific to the management of activities to be undertaken at the Glenfield Landfill licensed premises. The plan must include, but not be limited to:

    a. Details of the exact location of the rail link in relation to landfill cells and activities.
    b. Details of land tenure and licence management. Where land is to be excised from the landfill licenced premises the proponent must include a surveyors plan.
    c. Details of how access during construction and operation will be maintained including access to landfill monitoring and environmental controls.
    d. Details of material requirements and how landfill levy issues will be managed when bringing construction material through the landfill.
    e. Details how community interactions will be managed such as notification of operations and a community complaints line including a direct link to an onsite manager.
    f. Details of the management of environmental issues from construction/haulage/operation, including but not limited to:

        i. Soil and water (including runoff from stockpiles)
        ii. Air
        iii. Odour
        iv. Noise
        v. Waste
        vi. Asbestos
        vii. Contamination / remediation

12. The proponent must provide all management plans to the EPA for review and approval at least two months prior to commencement of construction (including early works). No works are permitted to commence within the Glenfield Landfill licensed premises without the EPA's written approval.

13. The proponent must provide the EPA with a CQA report within 60 days of the completion of the Rail Link project.

Air quality

The EPA has reviewed the Air Quality Impact Assessment (AQIA) prepared for the SIMTA Stage 1 project approval. The AQIA, has been conducted in general accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW. The assessment includes a best practice review, and an Air Quality Management Plan as required by the SEARs. The EPA considers that the outcomes of the assessment are plausible.

Container handling equipment

The EPA notes that the onsite container equipment are emission sources where improved environmental outcomes can be achieved. Emissions from container handling equipment present the largest contribution (emission load) to the emissions from the site. The best practice review identified the following in relation to container handling equipment:

- New reach stacks to achieve best practice emissions performance to meet US EPA Tier 3 / Euro Stage III standards;
- Electric cranes to reduce the need for diesel powered equipment in the long term; and
- Operational management measures (i.e. anti-idle policy, smoky exhaust monitoring).

The EPA notes that the AQIA estimates emissions for container handling equipment based on emission factors for US EPA Tier 3 / Euro Stage III standards. This is consistent with:

- The best practice review; and
- The NSW Government Resource Efficiency Policy which outlines US EPA Tier 3 / Euro Stage III for non-road diesel engines purchased from 1 January 2015 to 31 December 2017. However it is noted that the Policy outlines that from 1 January 2018, the minimum performance standard for newly manufactured non-road diesel plant and equipment must be US EPA Tier 4 or EU Stage IV compliant.

Additionally it is noted that a commitment to implement an electric gantry crane system has been considered for the project design. The EPA advises that as the best practice review identified US EPA Tier 3 / Euro Stage III Standards as current best practice, and the AQIA presents impacts based on the adoption of emission estimates representing these standards as such it would be prudent to recommend a condition of consent in relation to these emission standards.

Proposed Conditions of Consent relating to Air Quality

The EPA recommends that that the following conditions be included as part of the development consent.

1. The development of a Construction Air Quality Management Plan;

2. Requirements for:

   a. All container handling equipment to meet as minimum US EPA Tier 3 / Euro Stage III or better emission standards;
   b. All container handling equipment, purchased after 2017, must meet US EPA Tier 4 or EU Stage IV emission standards;
   c. All locomotives operating on site to meet NSW best practice air emissions appropriate to the activity being undertaken.

3. The development (or further development) of the Operational Air Quality Management Plan, including linking the plan with:

   a. Procurement procedures or polices to facilitate the adoption of the best practice emission standards identified;
   b. Maintenance procedures, policies or plans to enable improved emission performances during overhaul/upgrades of locomotives;
   c. A clear defined strategy for implementation of electric container handling crane system, including a defined timeline and target for implementation; and
   d. Management measures contained in the EIS (i.e. anti-idling policy).