

11th November 2014.



Submission on Reference: SSD 5066/EPBC 2011/6086 Provided by Allan Corben 13 Woolmer's Court Wattle Grove NSW 2173 P/N 0451 998 774 Email allancorben@bigpond.com

Opening Statement

To validate the following comments I advise details of my employments history. During my employment life I spent 47 years in the transport and Logistics Industry. 14 years of that period was spent in a container transport operation located at Cooks River Rail Yard in NSW. As a result of being exposed to a noise level nowhere near the level that MICL propose, I now have to contend with an industrial deafness loss of 30%. Having had this experience in a container handling business, and experiences in many and varying transport operations, I consider myself well qualified in the knowledge of the negative aspect of these transport operations. It should also be noted that object to the proposal.

My submission is made up of copy paste content from the EIS in (Plain font) and my comments in (Bold)

MICL EIS notes Chapter 12 Noise & Vibration

Page 1 12. Noise and vibration



To demonstrate whether the recommended noise mitigation measures are likely to achieve a reasonable and practical reduction in unmitigated noise levels, a **hypothetical scenario** was developed to consider the effects of conceptual noise mitigation measures for the northern rail access option concept layout. This hypothetical scenario was used to predict noise levels associated with the Project at Full Build and is described in section 12.4.4. ***One of our community's major concerns is in respect of excessive noise levels resulting in sleep disturbance. The use of the word hypothetical (above) doesn't give me confidence that the study findings are actual, but theory. Should the development then go ahead based on this concept of assessment and it is then found that the actual noise levels are much higher than predicted and the surrounding residents suffer sleep disturbance. At this point the development cannot go back, so what will be done to ensure the local residents lives aren't totally ruined due to unacceptable noise levels.***

Far too often MICL use the word mitigation and when questioned on how they intended to mitigate the noise levels at a recent community meeting I was told by the CEO Ian Hunt that it would be up to the successful company who is approved to construct & operate the terminal to address this issue, which I found to be a very poor answer.

The current noise level in the area surrounding the proposed site is extremely low with little noise of a day and extremely quiet of a night.

Page 3 12.1.2 Scenario assessment

The development of the Project would occur progressively over approximately 15 years. Several development scenarios were therefore considered to assess potential noise and vibration impacts. The scenarios are listed below and include indicative layouts for each of the rail access options: ***This development consists of five phases of construction with the noise levels at Phase 1 not anywhere near the level at the completion of Phase 5. For this reason, it's imperative that modeling comes up with an actual predicted noise level as it's too late when the facility is in operation to rectify the noise issues.***

Page 5 12.2 Existing environment Figure 12.1 shows the location and type of the nearest and/or most potentially affected noise sensitive receivers. These were considered both from the perspective of assessing the potential worst case noise and vibration impacts within the surrounding communities and to inform appropriate mitigation measures. ***Figure 12.1 shows 5 potentially affected receivers when compared with glossary booklet (Attached) handed out at a recent MICL Community meeting suggests that there are more potentially affected receivers (Possibly 17) than what appears in the EIS which is misleading. A resident who lives very close to one of the receptors near the southern freight line has qualified evidence that he suffers in excess of a 100 Db(A) when compared with the near receptor that has figure of 47 Db(A) ?????***

Page 12 Operational rail noise criteria (for the rail access connection operations)

Airborne noise from rail freight movements on the proposed rail access connection between the SSFL and the main IMT site was assessed in accordance with the NSW EPA's (2013) Rail Infrastructure Noise Guideline (RING). This rail connection meets the RING definition of a non-network rail line exclusively servicing an industrial site. The RING requires rail noise levels to be assessed against the INP amenity noise criteria listed in Table 12.5. (This does not include rail freight operating within the main IMT site, which was assessed in accordance with the INP intrusive noise criteria, along with other IMT. ***The proposed spur lines connecting the site from the southern freight line are of a curved construction which is prone to wheel squeal that emits a high level of sharp noise. I noticed that in the MICL site plan there exists a tight curved rail section (circle shape) at the end of the terminal. By nature this type of rail structure has a heightened level of wheel squeal which may exceed criteria. This is evidenced by the problem that residents adjacent to the northern freight line at Beecroft are having to put up with horrible high pitched wheel squeal which must not be duplicated at Moorebank.***

Page 34 12.3.7 Sleep disturbance assessment – operational noise

Operational activities at the IMT site during the night and early morning, such as containers being maneuvered heavily and the shunting of rail freight, could result in short-lived high noise levels with the potential to disturb sleep. ***People living 200 to 800 metres from the proposed sites western & eastern boundaries will be impacted by way containers are handled during the unload/loading & stacking***

process which creates a loud and intrusive type of noise. At a recent MICL community meeting the noise specialist made a comment that they would implement a work procedure as to have straddle crane drivers not strike containers together during the handling process. I have never heard of such an outrageous comment being made by what we refer to as specialist consultant. These crane operators are doing a job in which containers regularly come in contact with other containers making a booming sound that can be heard from far away. There is no way that MICL will be able mitigate noise of this type that has been occurring for as long as I can remember due to humans being involved. "Maybe wrap the containers in Bubble wrap would do the job" These specialists have a habit of treating people like idiots.

There is also the issue of shunting noise which can be sharp and loud. When rail wagons are being pulled out of the terminal siding the forward movement of the wagons creates a machine gun like noise as the slack in the rail wagon couplings takes up. This noise level can be incredibly loud.

Page 35 Table 12.23 Predicted maximum operational noise levels at nearest receptors in Casula *The figures in Table 12.23 should be questioned as they would appear to be ambient figures because there is evidence that residents close to the Southern Rail Line are already being exposed to noise levels in excess of 100 Bd(A)*

In regard to sleep disturbance caused by IMEX and interstate train movements on the rail access connection, the maximum noise levels are predicted to be within 80 dB(A) L_{Amax} (the commonly used maximum noise objective for rail) at the nearest receptors in Casula for the central and southern rail access connection layouts. However, predicted noise levels for the northern rail access connection option of up to 83 dB(A) L_{Amax} at Lakewood Crescent and 86 dB(A) L_{Amax} at Buckland Road in Casula are above the adopted 80 dB(A) L_{Amax} sleep disturbance objective. Sleep disturbance impacts may therefore be experienced at the nearest receptors to the northern rail access connection option. *The above statement confirms that the level of noise at Casula will most certainly impact on residents. These same people have been fighting for many years for noise walls to be built along the SSFL to allow for them to have some form of quality of life.*

Page 36. 12.3.8 Operational noise on the network rail line (SSFL) Rail noise levels were not predicted for receptors in Wattle Grove because, based on the assessment, potential operational noise levels at Wattle Grove would comply with the planning noise criteria. *Rail noise levels for Wattle Grove should have been predicted due to the fact that the level of the land in Wattle Grove is at the similar level to the proposed site and being a basin area may require mitigation.*

Page 43 12.4.3 Proposed noise mitigation measures

Most mitigation commitments in this section indicate that the proponent will require large team of supervisor's to control the operators from sounding their horn, reversing their vehicles or truck drivers sounding their vehicle horns. The content of this section is simply smoke and mirrors.

Page 44 Control of source noise emissions

In addition to the mitigation measures above, the following measures are proposed to further control potential rail noise from wheel squeal: The turn radius of curved track sections would be greater than 500 m to reduce tight turns in the alignment. ***Observation of site plan layout viewed at one of the community meetings held by MICL showed a large circled section of rail line at the southern end of the site. This section of rail is tightly curved and will certainly cause loud wheel squeal.*** ***In respect of the greasing system I would refer the proponents and NSW Planning to the ongoing issue of wheel sequel on the northern rail line at Beecroft. The level of wheel squeal remains high regardless of the greasing system being used.***

Page 44 Controlling noise propagation

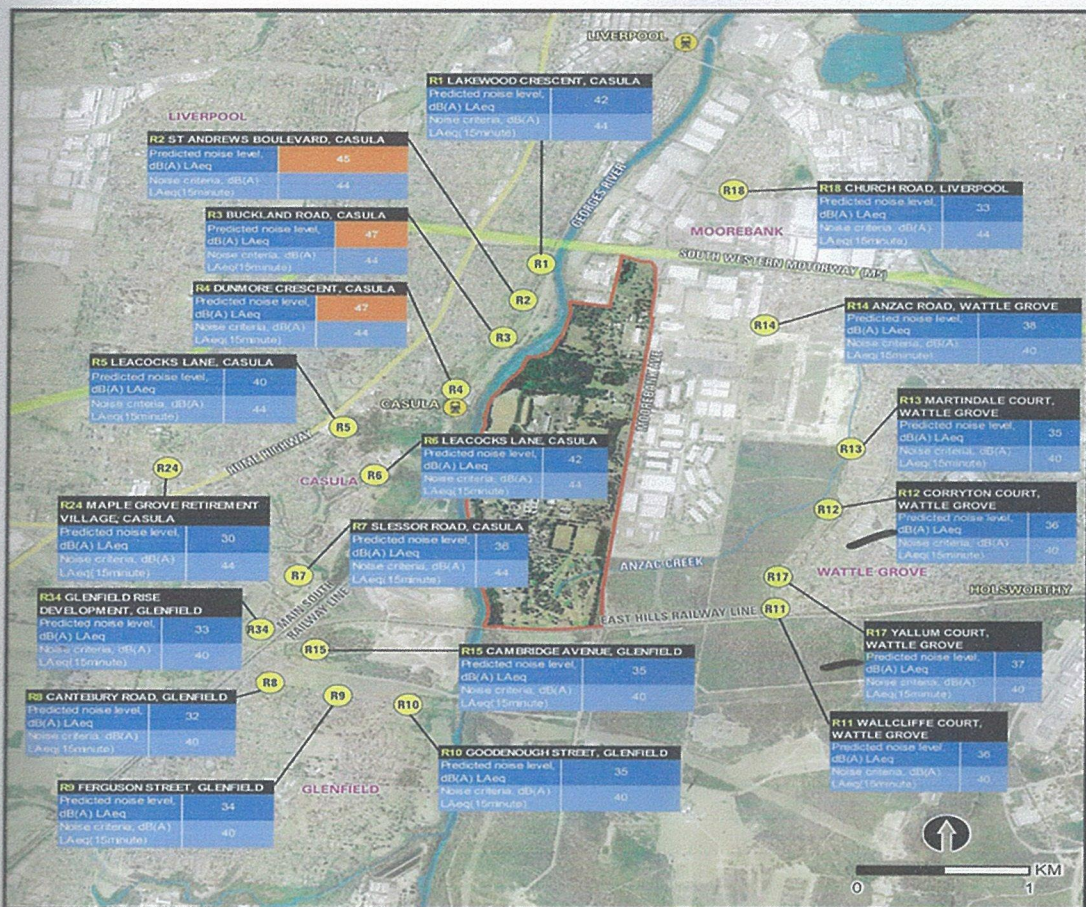
TEU containers could be used as noise barriers where they are stacked, to eliminate gaps or openings and to effectively impede the direct line of sight to nearest receptors. This is likely to require an operational management procedure to ensure the container areas adjacent to the residential communities are maintained so that the containers are at the maximum practicable eight at all times (typically up to five TEU). ***This statement is open ended and is in no way any form of guarantee as M/T TEU's might not be available to ensure that the impacted residents are consistently protected 24/7***

Page 45 Where feasible, all onsite buildings and structures would be designed and constructed to impede noise from ground level operation of heavy vehicles, side picks and ITVs. The detailed design of the IMT would seek to locate the warehouse buildings to the west of the site, where feasible, to impede the propagation of noise to Casula. ***The MICL site plan shows the warehousing on the eastern side of the site. Also no mention is made in respect of noise impact being mitigated on the eastern side (Wattle Grove) to protect its residents from excessive levels above INP criteria (Refer to table 12.29 Page 47) which shows five locations of that suburbs to be above the criteria.***

Page 51 12.5 Summary

Casula, based on monitoring at L9, Buckland Road: RBL noise levels of 39 (daytime and evening) and 33 (night-time) LA90, 15 minute dB(A); and ambient noise levels of 55 (daytime), 54 (evening) and 53 (night-time) LAeq, 15 minute dB(A);

Wattle Grove, based on monitoring at L7, Corryton Court: RBL noise levels of 35 (daytime), 36 (evening) and 32 (night-time) LA90, 15 minute dB(A); and ambient noise levels of 55 (daytime), 49 (evening) and 46 (night-time) LAeq, 15 minute dB(A); ***The above data suggests that residential properties on the eastern side of the proposed terminal will need mitigation when the Evening & Night criteria are 45 & 40 respectfully.***



- R1 Residential noise receptor
- Rail line & station
- Moorebank Intermodal Terminal boundary

Noise levels: Daytime noise levels with the northern rail connection (2030) – before mitigation.