



DOC17/345178
SSI 7127

8 August 2017

Mr Kane Winwood
Team Leader
Transport Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Winwood

Northern Road Upgrade (SSI 7127) – EPA review of EIS

I refer to the request from the Department of Planning and Environment (DP&E) to the Environment Protection Authority (EPA) dated 16 June 2017 to undertake a review of the Environmental Impact Statement (EIS) for the Northern Road Upgrade.

The EPA has reviewed the EIS and has provided comments in Attachment 1. The comments outline the EPA's concerns regarding certain aspects of the EIS.

Draft recommended conditions of approval for noise and water have been included in attachment 1. EPA will provide further recommended conditions during the response to submissions stage of the process. The EPA also requests the opportunity to comment on the draft conditions of approval proposed by DP&E prior to determination.

If you have any questions regarding this letter please call Mark Jansons on 9995 6829.

Yours sincerely

A handwritten signature in blue ink that reads 'M. Sharpin'.

MIKE SHARPIN
Unit Head Metropolitan Infrastructure
Environment Protection Authority

Attachment 1

NOISE

The EPA has concerns regarding the measured “rating background level” (RBL) for Saturday afternoon. This period between 1pm and 6pm Saturdays is described in the EIS as “Out of Hours Works – Day”. The RBL in this period is up to 7 dB(A) above what is measured during standard construction hours.

The EPA’s concerns are;

- That the RBL was assessed using only one day of data. Part 3 of the NSW Industrial Noise Policy states that the equivalent to one week’s worth of valid data covering the days and times of operation of the development should be used in determining RBL. This is designed to ensure multiple measurements are taken for each period and the median of the data is used to set the RBL. Using only one Saturday afternoon of monitoring data does not give enough data to obtain a representative RBL for each catchment.
- There is no assessment undertaken as to why the RBL on Saturday afternoon is higher than the standard construction hours RBL. Traffic data for the Saturday afternoon period is not broken down to cover this period so the higher RBL cannot be linked to increased traffic.

The EPA recommends that the proponent either;

- Undertake further monitoring for the Saturday afternoon period, and
- Provide further justification as to why the RBL in this period is higher, or
- Use the RBL from standard construction hours in the Saturday afternoon period.

Recommended Condition of Consent

Hours of operation:

Standard construction hours

Unless permitted by an environment protection licence, construction works and activities must:

- a) only be undertaken between the hours of 7:00 am and 6:00 pm Monday to Friday;
- b) only be undertaken between the hours of 8:00 am and 1:00 pm Saturday; and
- c) not be undertaken on Sundays or Public Holidays.

All works and activities must be undertaken in a manner that will minimise noise and vibration impacts on sensitive receivers.

The licensee must ensure that all feasible and reasonable noise and vibration mitigation and management measures are implemented during construction work authorised by this licence, in accordance with the Interim Construction Noise Guideline (DECC, 2009).

High noise impact works

High noise impact works and activities must only be undertaken:

- a) between the hours of 8:00am to 6:00pm Monday to Friday;
- b) between the hours of 8:00am to 1:00pm Saturday; and
- c) in continuous blocks not exceeding 3 hours each with a minimum respite from those activities and works of not less than 1 hour between each block.

except as expressly permitted by an EPL

For the purposes of this condition ‘continuous’ includes any period during which there is less than a 1 hour respite between ceasing and recommencing any of the work that is the subject of this condition.

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.

Recommended condition of consent

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

AIR QUALITY

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.

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.

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*.