



Your reference SSI 7066
Our reference: DOC15/251768
Contact: Peter Morrall 9995 6810

Karen Jones
Director Infrastructure Projects
Department of Planning and Environment
GPO BOX 39
SYDNEY 2001

Dear Ms Jones

SSD 7066 – HORNSBY QUARRY ROAD CONSTRUCTION SPOIL MANAGEMENT PROJECT EIS

I refer to the request from the Department of Planning and Environment (DP&E) to the Environmental Protection Authority (EPA) (your reference SSI 7066), 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'.

**Peter Morrall, signed on behalf of
Mike Sharpin
Unit Head Metropolitan Infrastructure
NSW Environment Protection Authority**

Encl. EPA's submission on the Environmental Impact Statement for the Hornsby Quarry Road Construction Spoil Management Project (SSD 7066)

EPA's submission on the Environmental Impact Statement for the Hornsby Quarry Road Construction Spoil Management Project (SSD 7066)

AIR QUALITY

The EPA provides the following comments on the air quality assessment completed for the project (AECOM, 27 July 2015):

- The assessment has been conducted in general accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW.
- The assessment predicts exceedances of relevant impact assessment criteria for 24-hr PM10, 24-hr PM2.5 and annual PM2.5. Exceedances are attributed to both predominantly elevated background concentrations and material handling activities.
- The assessment predicts large project contributions to cumulative impacts on days that exceed relevant criteria.
 - 24-hr PM10 - 18.1 ug/m³ (36%)
 - 24-hour PM2.5 - 8 ug/m³ (40%)

Recommendation

The assessment should be revised to include:

- Additional proactive controls (where available) to help ensure that:
 - The project will not cause exceedances of relevant particle impact assessment criteria.
 - To reduce the project predicted incremental impacts.
- Reactive management strategies to ensure that project impacts are acceptable under adverse conditions, including adverse weather and elevated background concentrations.
- A detailed emissions inventory for all particle sources at the site. Where particle emissions are assumed to be controlled or managed, the emissions inventory should be linked to a detailed air quality management plan that includes, as a minimum:
 - *Key performance indicator(s);*
 - *Monitoring method(s);*
 - *Location, frequency and duration of monitoring;*
 - *Record keeping;*
 - *Response mechanisms; and*
 - *Compliance reporting.*

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.

Recommendation

Control AQ16 within Table 7-18 (p. 239) states:

"Haul trucks and plant equipment would be switched off when not used for periods of greater than 15 minutes. Vehicle engines will be turned off while parked on site".

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.

NOISE AND VIBRATION

The EIS has addressed the EPA's main comment on the draft by the proponent applying the "local road" criteria to road traffic noise on Bridge Road.

The predicted traffic noise increase as a result of haulage truck movements generated by the project is less than 2dB on all roads along the haulage routes, with the exception of Bridge Road.

With the number of truck movements per day initially proposed, an increase of almost 12dB was predicted for Bridge Road. This has been reduced by the incorporation of a major mitigation measure; the proposed reduction of truck numbers onto the site from 50 to 35 per hour.

Section 5.1.5 of Appendix D lists mitigation measures to be implemented to reduce and manage truck traffic noise impacts. The EPA supports the proposed mitigation measures and suggests appropriate measures be incorporated where possible into a driver Code of Conduct. RMS might also consider the possibility of including clauses in driver's contracts that:

- Require them to abide by the reasonable direction of RMS in relation to minimising noise impacts (such as not using exhaust, or engine compression, braking on Bridge Road);

For activities other than truck haulage, predicted noise levels are above the nominated Noise Management Levels, so all feasible and reasonable noise mitigation measures should be implemented. Predicted noise levels presented graphically in Appendix D indicate levels about 5dB higher at Bridge Road residences compared with other residences. Activities are restricted to the Standard Hours in the Interim Construction Noise Guideline (ICNG), which is the major mitigation measure for construction noise. The EIS identifies other mitigation measures that might be implemented, subject to confirmation in a Construction Noise and Vibration Management Plan (CNVMP) to be developed. The EPA prefers that mitigation measures are confirmed in an EIS but accepts that they be confirmed in a CNVMP as a minimum.

The EPA can support the project provided that all feasible and reasonable noise mitigation measures are implemented where noise levels will exceed the relevant triggers in the Interim Construction Noise Guideline and the Road Noise Policy. The Department of Planning and Environment is best positioned to consider the social and economic benefits of the project against noise impacts and ensure that all noise mitigation measures that are feasible and reasonable will be implemented.

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. It states in the EIS (p48):

"However, haulage of material from the NorthConnex spoil generation sites to the Hornsby Quarry site would be undertaken so that haulage trucks arrived at the Hornsby Quarry no earlier than the commencement of spoil emplacement activities nominated in the EIS, being 7 am on weekdays and 8 am on Saturdays. Trucks would not, under normal operating conditions, be required to queue outside of the Hornsby Quarry site outside of these hours."

Recommended Condition of Consent

- Construction vehicles must not arrive at the project site or in surrounding areas outside approved construction hours.

WATER QUALITY

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').