

“Attention: Executive Director, Major Projects Assessment”

4/8 Marlene Crescent
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Email:
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4th May 2012

Dear Sir/Madam,

Re: **Macdonaldtown Gasworks Remediation Project (MP 09_0145).**

Recently we received a letter from Planning & Infrastructure **Macdonaldtown Gasworks Remediation Project (MP 09_0145).**

The Director-General of the Department of Planning and Infrastructure has received a project application from RailCorp to remediate a former gasworks site located on RailCorp land adjacent to Macdonaldtown Station. Due to limited space at the Macdonaldtown site, the proposal also seeks to potentially use a site within the Chullora Railway Workshops and Yards to treat some of the excavated material should it be required.

I'm and my neighbours are object to the project!

For the residents of Chullora this means more noise and more pollution, plus we will have a potential hazard very close to us!

Soils impacted with PAHs, TPH C>10, heavy materials and demolition wastes, volume 1,900 cube m- Restricted Solid;

Soils impacted with coal tar, potentially malodorous, Volume 14,820 cube m, Restricted Solid/Hazardous;

Tar, Volume 420 cube m/Hazardous;

Tar Impacted water (Known Hazardous Liquid waste), Volume 640 cube m.

On the assumption that it takes up to 10 minutes to manoeuvre, load and release a truck and dog trailer, the theoretical maximum number of trucks which could be loaded in a 10 hour period would be in the order 65-70 vehicles. With the rate at which vehicles

can be located on to trucks, dictating the amount of material which can be removed from the site, it is apparent that maximum number of truck daily movements generated by the proposed activity will be between 65-70. This level of activity will not have any measurable (?) impact on the surrounding road network. **What about the people, living in the residential area along Marlene Crescent, who will have huge negative impact on their wellbeing.**

In August 2000 the former Macdonaldtown Gasworks was declared by the NSW Environment Protection Authority (EPA) to pose a Significant Risk of Harm (SRoH) to human health and the environment. The declaration was made in consideration of the concentrations of contaminants in the soil and groundwater reported in previous environmental site assessments.

It is understood that RailCorp wish to remediate the Macdonaldtown site to a condition that:

- Reduces (? Only reduces!) health risks to future commercial / industrial users to an acceptable level;
- Reduces (? Only reduces!) the potential risks to the surrounding environment to an acceptable level;

It will only reduce the health risk to future commercial / industrial users to an acceptable level;
and potential risk to the surrounding environment to an acceptable level;

In the RailCorp Chullora Newsletter they have said:

“As part of the remediation process, RailCorp is planning to use a section of our Chullora Railyards site for the temporary treatment of some tarry soils from the Macdonaldtown Gasworks site.”

First of all, RailCorp don't say for how long more than 1000 cube m of contaminated soil/waste will be remain in Chullora and second of all does this not mean that we will face another “Major Project” removal of all treated materials in the future? Again, more noise, more pollution!

In our view RailCorp is a strong and affluent company so technically and practically they can afford to remove the potentially hazardous material away from residential areas.

Many families in our area have children and we raise concerns not only about the various threatened species of frogs and Grey Headed Flying Fox that exist in our area but more importantly human health and wellbeing!

Conclusion: It's absolutely impossible to remediate one suburb by placing another suburb at risk, or potentially at risk.

The potentially hazarded soil must be removed out of all residential areas to rural areas with no population around!

My husband and I went to the Strathfield Council to look at the Environmental Assessment on the 26.04.2012 and we found that:

Macdonaldtown Gasworks

MP 09_0145 - Gasworks Remediation

Appendix B - Phase 1&2 ESA.pdf

Potential Environmental Issues

Products such as tar, tarry oils, ammonia, sulphuretted hydrogen, native oxide of iron, coal gas and shale gas have been found on the site. These products represent potential chemical contaminants such as polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPHs), benzene, toluene, ethylbenzene and total xylenes (BTEX), phenolics, ammonia, heavy metals (cadmium (Cd), chromium (Cr), copper (Cu), lead (Pb), mercury (Hg), nickel (Ni) and zinc (Zn)), arsenic (As), cyanide (CN), sulphide/sulphate (SO₃/ SO₄) and organochlorine pesticides (OCPs).

Visual Impact Assessment

Soil Treatment Area, Chullora Railway Workshop Facility

4 Visual Assessment

4.4 Identification of Near-Field Receptors

Unrestricted views of the Chullora Railway workshops, and thus, of the treatment area, potentially exist from the residences present to the east on Marlene Crescent, which is situated on elevated ground more than 10 metres above the level of the workshops. The western side of Marlene Crescent, in particular, potentially affords unrestricted views of the Railway Workshops to residents on the first floor or above.

6 Environmental Impact Assessment

6.1 AIR QUALITY AND HEALTH

At the Macdonaldtown site, excavation activities and heavy vehicle movements have the potential to generate dust and odours, and there is also potential for vapours to be generated from impacted soil and groundwater. There may be a potential risk to human health if workers or residents are exposed to them at sufficient concentrations over sufficient timeframes.

Air quality impacts at the Chullora site are expected to be low due to the larger distance to sensitive receivers.

6.3.1 Project Specific Noise Levels

The Interim Construction Noise Guideline also nominates a “highly noise affected” level (being over 75 dB(A) at the receiver). The highly noise affected level represents the point above which there may be strong community reaction to noise.

Table 21: Summary of Chullora Project Specific Noise Levels (from Acoustic Logic 2011a)

SURROUNDING
RECEIVERS
BACKGROUND
NOISE LEVELS
dB(A) L₉₀
PREDICTED NOISE LEVELS DURING REMEDIATION WORKS
PSNL
TARGETS
dB(A)
EXCEEDANCE
MATTER NOISE SOURCE
PREDICTED
NOISE dB(A)
Residences to
the east (of
proposed
treatment area
at Chullora)

46
Plant
Supply air fan 46
51
0
Extractor 32 0
Generator 40 0
Pug Mill 51 0
Receipt,
Stockpiling,
Treatment and
Disposal of
Soil
20T Excavator with bucket (outside
enclosure)
52
56
0
20T Excavator with bucket (inside enclosure) 44 0

0
Extractor 43 0
Generator 51 0
Pug Mill 62 0
Receipt,
Stockpiling,
Treatment and
Disposal of
Soil
20T Excavator with bucket (outside
enclosure)
60
Truck with dog trailer 53 0
Workshops to
the west
Not measured
Plant
Supply air fan 57
75
75
0
20T Excavator with bucket (inside enclosure) 55 0
Truck with dog trailer 61 0

6.3.3 Vibration

Chullora

The damage vibration limits that have been identified for the buildings are 5mm/s PPV for residential building and 20mm/s PPV for nearest rail track. Acceptable Vibration Dose Values for Intermittent Vibration were identified for residences as 0.2 for daytime preferred and 0.4 for daytime maximum and 0.8 for daytime preferred and 1.6 for daytime maximum for industrial workshops (m/s^{1.75}) (Acoustic Logic 2011a).

The Noise and Vibration assessment (Acoustic Logic 2011a) noted that if the vibration controls are employed, the works should not impact on rail infrastructure or residential receivers.

6.3.4 Noise and Vibration Controls

The remediation contractor is to prepare site specific Noise and Vibration Management Plan(s) which must be submitted to the Director General for approval and comment prior to any works commencing on

site and complied with during any construction works. The plan(s) must include, but not be limited to, the following:

- Confirmation of the level of community consultation that has, is, and will be undertaken with Building Managers/occupiers of the main adjoining noise sensitive properties likely to be most affected by site works and the operation of plant/machinery particularly during the demolition and excavation phases;
 - Confirmation of noise, vibration and dust monitoring methodology to be undertaken during the main stages of work at neighbouring noise sensitive properties in order to keep complaints to a minimum and to ensure the noise from site works complies with the relevant construction noise regulations;
 - What course of action will be undertaken following receipt of a complaint concerning site noise, dust and vibration;
 - Details of any noise mitigation measures that have been outlined by an acoustic engineer or otherwise that will be deployed on site to reduce noise impacts on the occupiers of
- Environmen tal As s es sment – Mac d onal d town Gaswor ks Remedi at i on

neighbouring property to a minimum; and

- What plant and equipment is to be used on site, the level of sound mitigation measures to be undertaken in each case and the criteria adopted in their selection taking into account the likely noise impact on the occupiers of neighbouring property and other less intrusive technologies available.

Controls for the Chullora plan to include (amongst other controls):

- Community consultation to be undertaken.
- Equipment shall be well maintained.
- A Polyvinyl enclosure with a minimum wall thickness of 7mm shall be installed.
- The ventilation system serving the enclosure shall be acoustically treated to ensure that the noise emission to the residential properties to the east boundary is less than 51 dB(A).
- Static equipment shall be located as far as possible from receivers.

The Noise and Vibration Management Plan(s) are to be submitted to the Director General for approval and comment prior to the commencement of any works on-site.

6.4 WASTE

Contaminated soils on the Macdonaldtown site are likely to include hazardous waste, special waste (asbestos) and restricted and general solid waste. Liquid waste will also be extracted, including free tar (sludge), impacted surface water, impacted groundwater and wastewater from decontamination activities on site.

6.5.1 Preliminary Hazard Analysis

A screening test is provided in DUAP (1997) to assess whether a development is potentially hazardous.

This is based on quantities of dangerous goods to be stored or handled with a particular development. By review of the proposed remediation works, the following storage / handling of dangerous goods has been identified:

- Storage / handling of tar on the Macdonaldtown and potentially Chullora sites. By review of CH2M Hill (March 2007) 'Delineation & Characterisation Sampling and Review of Remedial Options Former Macdonaldtown Gasworks – Burren Street, Erskineville, NSW' there is estimated to be 420m³ of tar present on the Macdonaldtown site. Coal tar is generally classified as Class 9 dangerous good. Transportation screening thresholds only are provided for Class 9 dangerous goods, with a limit of more than 60 weekly movements of tar causing SEPP 33 to

apply. It is unlikely that more than 60 truckloads of coal tar would be removed from the Macdonaldtown site, or received at the Chullora site, over the entire duration of the project

6.7 TRANSPORT AND TRAFFIC

The maximum number of truck daily movements generated by the proposed activity will be between 65– 70 (or 6 – 7 vehicles movements per hour). Transport and Traffic Planning Associates (2010) concluded that this level of activity will not have any measureable impact on the surrounding road network.

Traffic and pedestrian management requirements from Transport and Traffic Planning Associates (2010) to be implemented via the CEMP include:

- All vehicles transporting spoil and other material which is to be remediated or disposed offsite (ie. at Chullora) will secure the load in accordance with relevant authority requirements associated with the transport of hazardous materials.

7 Consultation

7.1.1 Agency Consultation

Consultation has been undertaken with the following state agencies, who in turn have informed the proposal and the preparation of this EA:

- Department of Planning and Infrastructure (DPI);
- Office of Environment and Heritage (OEH);
- Heritage Branch of Office of Environment and Heritage (OEH);
- City of Sydney Council;
- Strathfield Council;
- NSW Health; and
- Roads and Transport Authority (RTA).

Elton Consulting (2010, Appendix ZC) noted that most commonly identified issues raised were:

- Traffic and access arrangements (including preference for manning of Erskineville Road access gate with a traffic controller)
- Ecological issues such as onsite flora and fauna
- The importance of retaining the heritage value of the existing southern gasholder
- Noise and other amenity impacts now and during the remediation process (eg. odour and vibration)
- Health and safety impacts now and during the remediation process
- Program, timeframe and time of day for commencement and conduct of remediation works
- General queries regarding remediation of the site and the proposed future use of the site (including proposed hours of operation)
- The importance of ongoing opportunities for community input to the consultation process

8 Statement of Commitments

Noise

Via the CEMP works will be carried out within the following times:

- Monday to Friday: 7:00 am to 6:00 pm
- Saturday: 8:00 am to 1:00 pm
- Sunday and Public Holidays: No work

No work shall be conducted outside the above hours unless approved

by RailCorp(?) and deemed to be crucial to the control of potential environmental emissions from the site.

Chullora Material Treatment Facility Noise and Vibration Report

TRUCK MOVEMENTS

The transfer of material between Macdonaldtown and Chullora will be carried out through the use of single unit of trucks with a 'dog trailer'. Articulated vehicles will not be utilised due to road geometry constraints when exiting the site at Macdonaldtown and at the intersection of Erskineville Rd and Wilson St.

On the assumption that it takes up to 10 minutes to manoeuvre, load and release a truck and dog trailer, the theoretical maximum number of trucks which could be loaded in a 10 hour period would be in the order 65-70 vehicles(!). With the time taken to travel between Macdonaldtown and the potential treatment site at Chullora and return between Macdonaldtown and the potential treatment site at Chullora and return being approximately 2 hours, a fleet of 12 trucks would be required to remove up to 1,000m³ in a single day. With the rate at which vehicles can be located on to trucks, dictating the amount of material which can be removed from the site, it is apparent that maximum number of truck daily movements generated by the proposed activity will be between 65-70. This level of activity will not have any measurable (?) impact on the surrounding road network.

If the existing amenity noise levels due to industrial noise are close to or above the recommended acceptable noise levels, the operation of the site shall be designed to a lower level than the acceptable noise level.

Appendix U

[U - 110811 - R4 Chullora Noise and Vibration Report-complete.pdf](#)(1.198 MB)

7.3.2 Private Road Impact

The following items have been considered for the prediction of traffic noise generated by the private road:

- 8km/h speed limit.
- Typical Sound Power Level of truck with a 'dog trailer' movements measured by this office 108 dB(A).

9.2 ESTABLISHMENT OF DIRECT COMMUNICATION WITH AFFECTED PARTIES

To ensure that the communication with residents is effective, regular scheduled meetings between the remediation contractor and local residents may be required until all noise and

vibration issues have been addressed and the evidence of successful implementation of mitigation processes has been acknowledged by all parties. RailCorp are committed to keeping the community abreast of the progress of the project. Newsletters informing residents of the progress of the works and the upcoming construction activities may be issued as required, and meetings with residents may be held to communicate the progress of the project and measure the success of the control measures.

Appendix X

List of Abbreviations

A list of the common (?) abbreviations used throughout this report is provided below.

- As Arsenic
- Cd Cadmium
- Cr Chromium
- Cu Copper
- BTEX Benzene, Toluene, Ethylbenzene and Xylenes
- B(a)P Benzo (a) pyrene
- DCE Cis-1,2-dichloroethene
- DECC NSW Department of Environment and Climate Change
- DoP NSW Department of Planning
- DP Deposited Plan
- DQO Data Quality Objectives
- DWE NSW Department of Water and Energy
- EPA NSW Environment Protection Authority
- Hg Mercury
- HIL Health Based Investigation Level
- LOR Limit of Reporting
- MAH Monocyclic Aromatic Hydrocarbon
- Ni Nickel
- OCP Organochlorine Pesticide
- PCE Tetrachloroethene
- SAR Site Audit Report
- SAS Site Audit Statement
- PAH Polycyclic Aromatic Hydrocarbons
- Pb Lead
- PIL Phytotoxicity Based Investigation Level
- PCB Polychlorinated Biphenyls
- PQL Practical Quantitation Limit
- QA/QC Quality Assurance/Quality Control
- RPD Relative Percentage Difference
- TCE Trichloroethene
- TPH Total Petroleum Hydrocarbons (C₆-C₉ and C₁₀-C₃₆)
- VC Vinyl Chloride
- VOC Volatile Organic Compound
- Zn Zinc

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It is understood that RailCorp wish to remediate the Macdonaldtown site to a condition that:

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Appendix ZG

Two (2) threatened species recorded within 10km of the study area were considered to have the potential to occur: Green and Golden Bell Frog (*Litoria aurea*) and Grey Headed Flying Fox (*Pteropus poliocephalus*).

The impacts of the proposed works on Green and Golden Bell Frog and Grey Headed Flying Fox were considered against the Part 3A Threatened Species Assessment guidelines, and against the EPBC Act Administrative Guidelines on Significance.

Please Stop the Project

Yours Sincerely,

Yelena Mullins