Respondent: EPA

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Soils and contamination	The EPA is unable to support the routing of the rail link to the SSFL via the Glenfield Waste Facility until it can be demonstrated that the rail link will not compromise landfill pollution control and monitoring systems, including future post-closure care measures.	The *Phase 1 Environmental Site Assessment* prepared by Golders (2013) concludes that the contamination risk posed by the Glenfield Waste Disposal Facility could be managed via commercially available and well established remediation methods, and that, should waste within a landfill cell be disturbed, it could be disposed of in the active landfill cells. Further investigations would determine if the proposal would have an impact on the existing leachate management systems and pollution control and monitoring systems. Should the detailed rail link design impact on these systems they would be redesigned to offset these impacts; this would be addressed during subsequent stages of planning approval. The following measures are included within the statement of commitments, and would be progressed on approval of the Concept Plan: *The Proponent will undertake the following tasks in association with the detailed planning applications for the staged redevelopment of the rail corridor lands:* ▪ *Undertaking a Phase 2 intrusive environmental site assessment of the proposed rail corridor lands, with an objective to assess the risk posed to the detailed design and construction of the rail corridor by the areas of environmental concern identified within this report. The Phase 2 intrusive investigation would include a program of soil and groundwater sampling completed in accordance with the guidelines made or approved by the EPA under s 105 of the Contaminated Land Management Act 1997* ▪ *Developing a Contamination Management Plan with detailed procedures on:* – *Handling, stockpiling and assessing potentially contaminated*	Section 9 Appendix N *Phase 1 Environmental Site Assessment* (Golder Associates 2013b)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		materials encountered during the development works; – *Landfill gas management during the excavation, handling, and stockpiling of waste materials, if excavation is required during the development, in the area of the Glenfield Quarry and Landfill;* – *Assessment, classification and disposal of waste in accordance with relevant legislation; and* – *A contingency plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials, that may be encountered during site works.*	
Rail	Constraints applicable to the Sydney Trains and ARTC licence premises will also apply to rail interface works associated with the project.	Noted. SIMTA will comply with all ARTC licence requirements, where applicable, when undertaking the rail interface works associated with the SIMTA proposal. Specific licence requirements applicable to the proposed works would be identified during the subsequent stages of planning approval.	N/A
Soils and Contamination	In the event of a Phase 2 environmental assessment, the EPA would need to view any plan for intrusive investigation of the Glenfield Waste Facility licenced premises.	Noted. The Sampling Analysis and Quality Plan that would be prepared as part of the subsequent stages of planning approval and would be provided to the EPA. Any works undertaken within the Glenfield Waste Facility would be subject to compliance with EPLs held for this facility.	N/A
Soils and Contamination	Concerns that construction of the rail link through Glenfield Waste Facility may disturb emplaced waste and release odours and uncontrolled landfill gas emissions. Should the rail link component of the Concept Plan be approved the following conditions to provide the following information should be required:	Noted. These requirements would be addressed as part of the Project Application for Stage 1 of the SIMTA proposal.	Section 9 Appendix N *Phase 1 Environmental Site*

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	▪ Details of the quantity, location, method and timeframe of landfilled waste to be removed ▪ Measures to mitigate odour impacts on sensitive receptors, including an undertaking to apply a cover daily to exposed waste ▪ Any impacts on the groundwater and landfill bore and their subsequent repair/ replacement ▪ The proposed method to ensure the landfill barrier system disturbed in the removal process is replaced/ repaired to ensure on-going performance (including sub grade preparation/ specifications, liner installation/ reinstallation and construction quality assurance procedures) ▪ Provide the EPA with a construction quality assurance report within 60 days of completion of works impacting the landfill barrier system ▪ An overview of any access and/or storage arrangements with the Glenfield Waste Facility in relation to the construction of the project.	The following commitment has been included in the EA: *Developing a Contamination Management Plan with detailed procedures on:* ▪ *Handling, stockpiling and assessing potentially contaminated materials encountered during the development works;* ▪ *Landfill gas management during the excavation, handling, and stockpiling of waste materials, if excavation is required during the development, in the area of the Glenfield Quarry and Landfill;* ▪ *Assessment, classification and disposal of waste in accordance with relevant legislation; and* ▪ A contingency plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials, that may be encountered during site works.	*Assessment* (Golder Associates 2013b)
Soils and Contamination	There is likely to have been fuel spills and leaks associated with the underground fuel storage tanks on the terminal site, and as such investigations are required to address Volatile Organic Compounds venting during the removal of the tanks and subsequent soil remediation. The EA does not adequately address fugitive VOC emissions during site remediation.	Section 9 of the EA notes that semi-volatile and volatile organic compounds are contaminants of concern on the SIMTA site. The following commitment has been made within the EIS: *The Proponent will undertake the following tasks in association with the detailed planning applications for the staged redevelopment of the SIMTA site:* ▪ *Undertaking further investigations in the areas of environmental concern likely to be impacted upon by the proposed development. These investigations will be based on the detailed design of the proposed development to identify the extent of contamination, and what, if any, remediation activities are needed. The remediation of areas of the site (if any) would be best matched to the development of the site and considered as part of the future*	Section 9 Appendix N *Phase 1 Environmental Site Assessment* (Golder Associates 2013b)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		design. It is noted that the 2013 Amendment of the Assessment of Site Contamination National Environment Protection Measure 1999 (ASC NEPM) has come into force and further contamination assessments for the site would be undertaken in accordance this guideline, which provides for vapour intrusion assessments.	
Soils and Contamination	The scope of site investigations conducted to date is insufficient to characterise the contamination status of the site. It is unclear if a site auditor has been engaged, and if the EA is confirming the presence of Hexachlorobenzene in groundwater, and if so what concentration. Recommends that the proponent commit to engaging a site auditor (under the *Contaminated Land Management Act 1997*) and provide further information regarding the contamination status of the site	A commitment to undertake further contamination assessments has been included within the EA. These would be undertaken as part of the subsequent stages of planning approval, where applicable The Phase 1 investigations presented within the EA concluded that the contamination risk posed by the site could be managed via commercially available and well established remediation methods.	Section 9 Appendix M *Preliminary Environmental Site Investigation* (Golder Associates 2013a) Appendix N *Phase 1 Environmental Site Assessment* (Golder Associates, 2013b)
Hazards and Risks	The EPA anticipates that bonded asbestos may be disturbed during proposed work within the existing rail corridor. As such the proponent should be required to consult with WorkCover NSW concerning the management of asbestos on the project sites,	The *Hazards and Risk Assessment* (Appendix L) identified the potential for contamination on the site and the relevant legislative requirements and policies that would be invoked to address the risk. These are incorporated into the following statements of commitment: *The Proponent will develop an asbestos management plan for the*	Section 8.4 Section 18 Appendix L *Hazards and*

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	including the rail link corridor and rail link networks interface sites.	*SIMTA proposal containing a risk assessment undertaken in accordance with Code of Practice for the Management and Control of Asbestos in the Workplace (NOHSC, 2005).* *Where the management plan recommends the removal of asbestos from site all works will be undertaken in accordance with the Code of Practice for the Safe* Notification requirements for the removal of asbestos are addressed in the guidelines identified and would be implemented as the legislation prescribes.	*Risk Assessment* (Hyder Consulting 2013)
Air Quality	Consideration should be given to requiring SIMTA to monitor dust emissions (visual) and meteorological forecasts and observations reported from the nearest BoM automated weather station at all times during site preparation, demolition and construction phases to ensure that dust management and suppressions measures are sufficient to minimise dust emissions on site and prevent emissions leaving the site.	The following commitments have been made within the EA: *The Proponent will undertake an air quality monitoring programme during the initial phases of both construction and operation of the SIMTA site in accordance with the Air Quality Impact Assessment and including:* ▪ *Nuisance Dust* ▪ *Air Emissions – PM_{10} and Nitrogen Dioxide* *The Proponent commits to the preparation of a Construction Environmental Management Plan prior to the construction of each stage to provide air quality and dust management/ mitigation procedures to be adopted during each of the construction phases of the development.* The monitoring program would include a review against available meteorological data and visual dust, in addition to the proposed dust monitoring.	Section 11.3.1 Appendix Q *Air Quality Impact Assessment* (Pacific Environment 2013)
Soils and Contamination	Consideration be given to requiring all site contamination investigations and remediation for the entire project site be completed as far as possible during Stage 1 to ensure more effective control of remediation–related air quality impacts.	The following commitment has been made in the EA: *Undertaking a Phase 2 intrusive environmental site assessment of the proposed rail corridor lands, with an objective to assess the risk posed to the detailed design and construction of the rail corridor by the areas*	Section 9 Appendix N *Phase 1 Environmental*

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		of environmental concern identified within this report. The Phase 2 intrusive investigation would include a program of soil and groundwater sampling completed in accordance with the guidelines made or approved by the EPA under s 105 of the Contaminated Land Management Act 1997. This would commence on approval of the Concept Plan and the outcomes of the investigation would accompany the Stage 1 Project Application.	*Site Assessment* (Golder Associates 2013b)
Noise and vibration	The assessment does not address the proposed standard hours of construction, as recommended in the Interim Construction Noise Guideline.	It is noted in the *Noise Impact Assessment* report (Appendix I) that the majority of construction is expected to occur during standard construction hours. The following statement has now been included as a Statement of Commitment: *All construction activities will have regard to the standard hours of 07:00 am to 06:00 pm Monday to Friday and 08:00 am to 01:00 pm Saturday (with approval from relevant authorities). Any works undertaken outside of these hours will be undertaken in consultation with relevant authorities. Works outside these hours that may be permitted will include:* ▪ *Any works which do not cause noise emissions to be audible at any nearby sensitive receptors.* ▪ *The delivery of materials which is required outside of these hours as requested by Police or other authorities for safety reasons. Local residents, commercial and industrial premises will be informed of the timing and duration of approved works in accordance with the notification provisions outlined in the CNMP.* ▪ *Emergency work to avoid the loss of lives, property and/or to prevent environmental harm.* ▪ *Any other work as approved through the CNMP Process.*	Appendix I *Noise Impact Assessment* (Wilkinson Murray, 2013) Submissions Report

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Noise and vibration	The assessment does not address the predicted sleep disturbance impacts in relation to any night-time construction or construction-related activity.	It is noted in the *Noise Impact Assessment* report (Appendix I) that the majority of construction is expected to occur during standard construction hours. The following statement has now been included as a Statement of Commitment: *All construction activities will have regard to the standard hours of 07:00 am to 06:00 pm Monday to Friday and 08:00 am to 01:00 pm Saturday (with approval from relevant authorities). Any works undertaken outside of these hours will be undertaken in consultation with relevant authorities. Works outside these hours that may be permitted will include:* ▪ *Any works which do not cause noise emissions to be audible at any nearby sensitive receptors.* ▪ *The delivery of materials which is required outside of these hours as requested by Police or other authorities for safety reasons. Local residents, commercial and industrial premises will be informed of the timing and duration of approved works in accordance with the notification provisions outlined in the CNMP.* ▪ *Emergency work to avoid the loss of lives, property and/or to prevent environmental harm.* ▪ *Any other work as approved through the CNMP Process.*	Appendix I *Noise Impact Assessment* (Wilkinson Murray, 2013) Submissions Report
Noise and vibration	The assessment does not address whether the recommended 5 dB adjustment factor for construction involving activities/ noise sources identified on page 16 of the Interim Construction Noise Guideline has been applied to predicted noise impacts.	No adjustment factor has been applied for the use of such equipment. The chosen methodology involved the modelling of all equipment for a particular construction scenario operating simultaneously. This approach was considered conservative since the actual scenarios are unlikely to involve all plant operating at once. If the 5 dBA adjustment were applied, the outcome of the construction noise assessment would be unchanged; that is, some predicted levels would exceed the established Noise Management Levels and none would exceed the Highly Affected Level. Accordingly, a Construction Noise and Vibration	Appendix I *Noise Impact Assessment* (Wilkinson Murray, 2013)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		Management Plan is to be prepared prior to the commencement of construction works. At a stage where more detailed construction details are known, the relevant adjustment factors for annoying noise sources should be applied.	
Noise and vibration	The assessment does not address the type of reversing and plant movement alarm to be fitted to construction vehicles, plant and equipment.	The assessment of construction noise was conservatively based on the total sound power level of all plant operating simultaneously for each construction stage. The assessment demonstrated that construction of the SIMTA proposal could be managed through the implementation of a Construction Noise and Vibration Management Plan. This plan would detail the specific measures that would be adopted onsite during construction to mitigate noise impacts. This is included as a statement of commitment: *Prior to undertaking demolition and construction on site, a Construction Noise and Vibration Management Plan should be prepared based on details of the proposed construction methodology, activities and equipment. This should identify potential noise and vibration impacts and reasonable and feasible noise mitigation measures (such as those identified in this report) that may be implemented to minimise any potential impacts, including engineering and management controls.* Construction noise impacts would be assessed in further detail at the subsequent stages of planning approval for the SIMTA proposal.	Section 6.3.1.2 Appendix I *Noise Impact Assessment* (Wilkinson Murray, 2013)
Noise and vibration	The assessment does not address intra-day curfews on high noise impact activities.	The *Noise Impact Assessment* (Appendix I) demonstrated that construction of the SIMTA proposal could be managed through the implementation of a Construction Noise and Vibration Management Plan. This plan would detail the specific measures that would be adopted onsite during construction to mitigate noise impacts. This is included as a statement of commitment: *Prior to undertaking demolition and construction on site, a*	Section 6.3.1.2 Appendix I *Noise Impact Assessment* (Wilkinson Murray, 2013)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		Construction Noise and Vibration Management Plan should be prepared based on details of the proposed construction methodology, activities and equipment. This should identify potential noise and vibration impacts and reasonable and feasible noise mitigation measures (such as those identified in this report) that may be implemented to minimise any potential impacts, including engineering and management controls. This plan would be developed in accordance with the Interim Construction Noise Management Guidelines, and would specify the requirements for respite periods during construction activities, if required.	
Noise and vibration	The assessment does not address the proximity of residents and other noise sensitive receivers to work on the proposed rail link (which is likely to be closer than 500 m).	The *Noise Impact Assessment* (Appendix I) has assessed the construction noise impacts on receivers as a result of construction activities associated with construction of the rail link. The assessment concludes that there is potential for noise criteria exceedances within the R3 receiver catchment during construction of the rail link connection with the SSFL. A Construction Noise Management Plan would be prepared to mitigate these impacts and is captured in the following statement of commitment within the EA: *Prior to undertaking demolition and construction on site, a Construction Noise and Vibration Management Plan should be prepared based on details of the proposed construction methodology, activities and equipment. This should identify potential noise and vibration impacts and reasonable and feasible noise mitigation measures (such as those identified in this report) that may be implemented to minimise any potential impacts, including engineering and management controls.*	Section 6.3.1.2 Appendix I *Noise Impact Assessment* (Wilkinson Murray, 2013),
Noise and vibration	Consideration should be given to requiring the proponent to prepare a detailed noise and vibration impact statement in conjunction with	The following statement of commitment is contained within the EA: *The Proponent will carry out detailed assessments for the subsequent*	Section 18

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	applications for approval of each stage of the project.	*application stages and when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers. The monitoring data should be used to validate noise models used in these assessments. The subsequent assessments should address the environmental assessment requirements, as determined by the approval authority, as a minimum.*	
Air quality	Commitments to implement air quality impact mitigation and management measures, as detailed in the CEMP for each construction stage, should be measureable and enforceable.	Details of a monitoring program for the construction and operation of the SIMTA proposal, along with the indicators and targets are presented within the *Air Quality Impact Assessment* (Appendix Q), and are committed to within the following Statement of Commitment: *The Proponent will undertake an air quality monitoring programme during the initial phases of both construction and operation of the SIMTA site in accordance with the Air Quality Impact Assessment and including:* ▪ *Nuisance Dust* ▪ *Air Emissions – PM_{10} and Nitrogen Dioxide* The Proponent commits to the preparation of a Construction Environmental Management Plan prior to the construction of each stage to provide air quality and dust management/ mitigation procedures to be adopted during each of the construction phases of the development. All management procedures will be measureable and enforceable and reported against KPIs.	Section 18 Appendix Q *Air Quality Impact Assessment* (Pacific Environment, 2013)
Air quality	Any assumptions of emission control efficiency/ performance should be linked to specific measures with measurable and auditable performance indicators.	Details of a monitoring program for operation of the SIMTA proposal, along with the indicators and targets are presented within the Air Quality Impact Assessment (Appendix Q), and are committed to within the following statement of commitment: *The Proponent will undertake an air quality monitoring programme*	Section 18 Appendix Q *Air Quality Impact Assessment* (Pacific Environment,

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		during the initial phases of both construction and operation of the SIMTA site in accordance with the Air Quality Impact Assessment and including: ▪ *Nuisance Dust* ▪ *Air Emissions – PM_{10} and Nitrogen Dioxide* The proposed monitoring would provide act as an auditable performance indicator for air quality for the proposal.	2013)
Air quality	SIMTA should also undertake the following: • Benchmarking against best practice process design and emission controls adopted at comparable intermodal facilities • Updating stage specific and cumulative air impact assessments • Updating the Statement of Commitments.	The following statement has now been included in the updated Statement of Commitments: *The Proponent commits to undertaking a review of national and international 'best practice' for the design and operation of intermodal facilities to identify reasonable and feasible management strategies to reduce air quality and noise impacts associated with construction and operation of the intermodal terminal development stages of the proposal.* In accordance with this commitment, the subsequent Project Applications for development of the intermodal terminal stages, and associated mitigation measures, would align to the recommendations provided in the best practice review, where applicable. There is a commitment within the Statement of Commitments as follows: *The Proponent shall consider the need to develop a vehicle efficiency and emissions reduction program for the facility to encourage good maintenance and efficient vehicle selection, taking into account the results of the air quality monitoring programme.* This would also be reviewed in accordance with the recommendations of the 'best practice' review.	Section18 Submissions Report

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Air quality	Consideration should be given to requiring the proponent to undertake a comprehensive air quality impact assessment for each stage of the proposal, including: ▪ Undertaking the assessment in accordance with Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (2005) ▪ Taking into account the final project design and worst-case meteorological and operating conditions ▪ Quantitatively assessing emissions of: solid particles; sulphur oxides, nitrogen oxides and hydrocarbons ▪ Assessing cumulative air impacts at a local and regional level ▪ A comprehensive air quality management plan of the proposal that includes: ▪ Explicit linkage of proposed emission controls to site specific best practice determination assessment and assessed emissions ▪ The timeframe for implementation of all identified emission controls ▪ Key performance indicators for emission controls ▪ Proposed means of air quality monitoring (location, frequency, duration) ▪ Poor air quality response mechanisms ▪ Responsibilities for demonstrating and reporting achievement of KPIs ▪ Record keeping and compliance response register ▪ Compliance reporting.	SIMTA is committed to undertaking air quality impact assessments as required by the planning assessment process for each relevant stage of the SIMTA proposal.	
Air quality	Long-durations idling: consider requiring the proponent to provide an assessment of measure, including: ▪ Scheduled sampling and analysis of air pollutants emitted by	The EA states that the intermodal terminal would include the use of state of the art rolling stock, including automatic shutdown of locomotives when idling. The following commitment is included within the EA:	Section 2.4.8, and 2.5.1.2 Appendix Q, *Air*

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	locomotives and heavy vehicles in the terminal and rail link for comparison against adopted project benchmarks for: fine particles; sulphur oxides, nitrogen oxides, hydrocarbons and other toxic air pollutants ▪ For idling reduction, including: operator training; automatic engine shutdown; 'shore power' being electricity grid plug in points to enable locomotives and trucks to switch over to mains power.	*The Proponent commits to developing a Traffic Site Management Plan prior to the commencement of operations at the site to minimise the potential impacts, including:* ▪ *Management measures to avoid trucks parking and idling either within or outside of the site boundaries* Regarding scheduled sampling and analysis of air pollutants emitted by locomotives and heavy vehicles, it is noted that there are no existing in-service test methods, other than acceleration smoke tests, for heavy vehicles. The recommendation by Liverpool City Council is therefore not feasible. Also, as indicated above, locomotives would be fitted with automatic shut-down, making in-service emissions testing redundant.	*Quality Impact Assessment* , Pacific Environment 2013
Air quality	Consideration should be given to requiring the proponent to prepare a review of intermodal terminal operational best practice process design, emission control and management measures that could be applied to each stage of the project, and to benchmark those measures against international best practice.	The following statement of commitment has been included in the submissions report: *The Proponent commits to undertaking a review of national and international 'best practice' for the design of intermodal facilities to identify reasonable and feasible design and management strategies to reduce impacts associated with operation of the intermodal terminal development stages of the proposal.*	Submissions Report
Noise	The EPA is concerned that the operational noise impact assessment may not be fully representative of the worst case impact scenario for operations at the terminal and rail link for the following reasons: ▪ The terminal and rail link were assessed using different criteria, yet the EPA maintains that the rail link is a linear extension of the terminal, not a transportation corridor	Figure 2-1 of the *Noise Impact Assessment* shows the extent of the rail corridor, which has been used to delineate areas of rail alignment assessed under IGANRIP and INP. These guidelines and associated criteria were applied in accordance with the methodology prescribed under the guidelines.	Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	▪ Details of operational train management at the terminal and rail link are not supplied to justify the adequacy of the list of train noise sources.	Assessment of the movements of trains on site was conducted against the Industrial Noise Policy (INP). The *Noise Impact Assessment* assessed the worst case 15 minutes operating period, and included four train locomotives operating on site during that 15 minute period. Section 2.3 of the *Rail Access Report* outlines the expected train turn-around times. At capacity, it is envisaged that 21-22 trains will use the SIMTA terminal each day, spread across the entire 24 hour period. This equates to roughly one train per hour. It is unlikely that a scenario where four trains would be idling on site within a 15 minute period would eventuate, potentially overstating the impact from train locomotives during operation.	Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013) Appendix H *Rail Access Report – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)
	▪ Train noise impact assessment appears to be limited to 81 class locomotives operating at the idle notch setting, and does not take into account locomotive movements	Noise from train movements within the terminal were not considered to be a significant contributor to receiver noise levels due to the short duration of individual locomotives being operated above the idle notch setting. This risk assessment was carried out based on the assumptions that the locomotives are compliant with the EPA Locomotive Noise Criteria, and that the average speed of locomotive movements within the terminal was 20km/h.	Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
	▪ Assessment of other class of locomotives has been omitted	SIMTA has made a commitment to purchase state-of-the-art rolling stock as per the Noise Impact Assessment.	Section 2.4.8, and 2.5.1.2

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		It is noted in section 2.3 of the *Noise Impact Assessment* and section 2.5.1.2 of the EA that the SIMTA terminal: *Will be serviced by world class and leading practice intermodal facilities, including:* ▪ *State-of the-art rolling stock*	Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
	▪ Noise impact assessment does not clarify if proposed increase in train lengths from 650 m to 1200 m during Stage 3 would involve additional noise contributions	The following Statement of Commitment is included in the EA: *The Proponent will carry out detailed assessments for the subsequent application stages and when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers.* The *Noise Impact Assessment* assessed a total TEU throughput of 1 million TEU which is the proposed operational capacity of the site. The extension of the rail sidings from 650m to 1200m would not alter the number or type of noise sources present on site. Changes in noise impacts on sensitive receivers would be negligible. A potential increase in train lengths within Stage 3 of the proposal will be assessed prior to construction or operation of the future operational stage.	Section 18
	▪ Noise sources related to inadequate track alignment and maintenance have not been considered	The rail alignment will be designed in accordance with ARTC standards. The final rail alignment will be determined within subsequent stages of planning approval. The design has looked at a number of options and opportunities and consultation has been sought, with the relevant authorities and landowners, to achieve the best design outcome. A commissioning	Appendix H, *Rail Access Report*, Hyder Consulting 2013

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		process would form part of the development process for the rail link. Maintenance of the rail tracks and sidings would be undertaken as required to ensure the safe and efficient operation of the intermodal terminal.	
	▪ Lack of clarity regarding the operating conditions considered for the purposes of IGANRIP assessment	In addition to the information presented in Section 6.4.1 of the *Noise Impact Assessment,* it was assumed that the average speed of the train over the length of track under IGANRIP assessment was 40 km/h. Further, it was assumed that 26 movements occur during the day and 16 occur at night.	Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
	▪ Lack of clarity regarding the current noise performance levels of the 81 class locomotives	SIMTA has made a commitment to purchase state-of-the-art rolling stock, and these would be per the *Noise Impact Assessment.* It is noted in section 2.3 of the *Noise Impact Assessment* and section 2.5.1.2 of the EA that the SIMTA terminal: "*Will be serviced by world class and leading practice intermodal facilities, including:* ▪ *State-of the-art rolling stock.*	Sections 2.4.8 and 2.5.1.2 Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
	▪ The assessment does not appear to assess empty container handling and transport, associated noise mitigation and	The handling of freight containers, both full and empty, is the primary focus of the operational noise assessment. Stackers, gantries, forklifts	Section 6.3.1.2

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	management measures (including curfews)	and the like are all used to handle both empty and full containers. Irrespective of whether containers are empty or full, noise impacts would be the same.	Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
	▪ The assessment does not appear to assess the range of maintenance activities to be undertaken to be undertaken at the terminal, the timing and level of noise	Wilkinson Murray (WMPL) did not consider maintenance activities to be a significant contributor to receiver noise levels. Further, as this is a Concept Plan, details regarding maintenance activities are insufficient to support assessment. WMPL consider that noise from maintenance activities should be carried out in association with the detailed applications for the relevant stage of the SIMTA proposal.	N/A
	▪ Incorrect designation of the receiver area R2 as an 'Urban' rather than 'Suburban '	The most affected residential receivers within R2 are in close proximity to the M5 Motorway and Anzac Road and Industrial Sites at DNSDC and the Moorebank Business Park. WMPL considers this to be representative of an 'Urban' setting, as per the INP. In any case, the most stringent criteria for these receivers are the intrusiveness criteria, which would also be the case if these receivers were re-classified as 'Suburban'.	Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
	▪ The cumulative operational assessment adopts assumptions that may not reflect worst case scenarios.	WMPL considers the cumulative assessment to be indicative of the likely noise emissions from both the SITMA and MIT sites. The cumulative assessment was made using the best available information regarding the MIT project. WMPL considers an assessment based on amenity criteria to be the most appropriate for cumulative impacts as	6.3.2 Appendix I *Noise Impact Assessment –*

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		the amenity criteria are designed to control noise emissions from multiple industrial developments. Amenity based assessments use the LAeq, period noise descriptor which is usually somewhat lower than the LAeq, 15min level for a given source. This can result in the amenity assessment appearing optimistic. Further, some assumptions in the cumulative assessment, such as ignoring the presence of any buildings on the MIT site, will lead to an over-prediction of receiver noise levels.	*Impact Assessment Report* (Wilkinson Murray, August 2013)
	Consideration should be given to requiring the proponent to revise the noise impact assessment to represent the worst case scenario for operations at the terminal and rail link, including improved mapping.	WMPL considers the *Noise Impact Assessment* to be at the appropriate level of detail for a Concept Plan Approval. This assessment is preliminary by virtue of the planning stage at which it has been conducted. It identifies key noise issues, establishes relevant criteria, and demonstrates, at a high level, the ability to comply with the criteria. WMPL recommends that approval is granted for the Concept Plan and that the criteria established in the noise impact assessment are identified as approval conditions.	Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
Noise	Consideration should be given to requiring the proponent to undertake a track commissioning process to ensure track alignment/ geometry does not generate unintended noise impacts.	The rail alignment will be designed in accordance with ARTC standards. The final rail alignment will be determined within the detailed design phase in subsequent stages of planning approval. The design has looked at a number of options and opportunities and consultation has been sought, with the relevant authorities and landowners, to achieve the best design outcome. A commissioning process would form part of the development process for the rail link.	Appendix H, *Rail Access Report*, Hyder Consulting 2013
Noise	Consideration should be given to requiring the proponent to commit to an on-going noise compliance monitoring response system including: ▪ Ensuring locomotives are fitted with automatic idle reduction technology.	As per Section 8.2 of the *Noise Impact Assessment* Report, noise monitoring requirements for operation of the intermodal terminal would be included as part of the Operational Environmental Management Plan for the facility.	Appendix I, *Noise Impact Assessment* (Wilkinson

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	▪ Undertaking on-going compliance noise monitoring of locomotives and ensuring that exceedences are not permitted access to the terminal and rail link.		Murray 2013)
Noise	Consideration should be given to requiring the proponent to commit to maintaining rail tracks on the rail link and terminal.	Maintenance of the rail tracks and sidings would be undertaken as required to ensure the safe and efficient operation of the intermodal terminal.	N/A
Noise	Consideration should be given to requiring the proponent to commit to a system of automatic rolling stock wheel defect detection and response system.	The following statement has been included in the updated Statement of Commitments: *The Proponent commits to undertaking a review of national and international 'best practice' for the design and operation of intermodal facilities to identify reasonable and feasible management strategies to reduce air quality and noise impacts associated with construction and operation of the intermodal terminal development stages of the proposal.* The review would include an assessment of whether such systems are reasonable and feasible and have been adopted as best practice at other intermodal terminals.	Submissions Report
Noise	Consideration should be given to requiring the proponent to implement a range of intermodal terminal operational best practice noise mitigation and management measures.	The following statement has been included in the updated Statement of Commitments: *The Proponent commits to undertaking a review of national and international 'best practice' for the design and operation of intermodal facilities to identify reasonable and feasible management strategies to reduce air quality and noise impacts associated with construction and operation of the intermodal terminal development stages of the proposal.*	Submissions Report
Noise	Consideration should be given to requiring the proponent to undertake	As per Section 8.2 of the *Noise Impact Assessment*, noise monitoring requirements for operation of the intermodal terminal would be	Appendix I, *Noise Impact*

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	validation assessment and reporting against predicted noise levels.	included as part of the Operational Environmental Management Plan for the facility. SIMTA is also committed to undertaking noise impact assessments as required by the process for each relevant development stage of the proposal.	*Assessment* (Wilkinson Murray 2013)
Noise	Consideration should be given to requiring the proponent to plan the site layout and operations at the terminal: ▪ To eliminate the need to reverse vehicles and plant ▪ Or where unavoidable, reversing to take place in noise attenuated enclosures.	The following statement of commitment has been included in the EA: *The Proponent commits to developing a Traffic Site Management Plan prior to the commencement of operations at the site to minimise the potential impacts, including:* ▪ *Management measures to avoid trucks parking and idling either within or outside the site boundaries* ▪ *Provision of adequate parking for heavy vehicles to accommodate any potential delays in scheduled times.*	Section 18
Noise	Consideration should be given to requiring the proponent to undertake safety risk assessments to determine alternate measures can be adopted instead of 'beeper' type reverse alarms.	All trucks must comply with the Occupation Health and Safety Act and Regulations, Federal and State Legislation, and relevant Australian Standards. Trucks must be fitted with a reverse alarm that automatically activates when the reverse gear is sleeted. All alarms must be audible above the noise level of the truck. The following statement has been included in the updated Statement of Commitments: *The Proponent commits to undertaking a review of national and international 'best practice' for the design and operation of intermodal facilities to identify reasonable and feasible management strategies to reduce air quality and noise impacts associated with construction and operation of the intermodal terminal development stages of the proposal.* Should this review conclude that alternative reversing alarms represent best practice in terms of safety, cost and environmental	Submissions Report

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		impacts at the site, they would be adopted according to the recommendations of the review for SIMTA site vehicles. A Construction Noise and Vibration Management Plan would be developed, prior to construction commencing, to implement best practice mitigation and management measures to minimise noise impacts prior to construction commencing. Consideration would be given to requirements for the use of lower noise impact alarms (such as 'squawker' type broadband alarms) as an alternative measures to the traditional 'beeper' type movement alarms.	
Rail	Consideration should be given to requiring the proponent to more fully address operational and environmental restrictions on the capacity of the existing freight network to accommodate project train movements for each of the 3 stages of the project, including relevant development consent and environmental protection licence conditions applicable to the SSFL.	Section 2.2 of the *Rail Access Report* and Section 5.3.2.3 of the EA outline the suitability of the proposed rail alignment and connection to the SSFL. It concludes that the current rail alignment is considered to be a suitable alignment to support a future whole or precinct access arrangement, with the MICL site also being able to access through the same connection point. Recent discussion with ARTC indicated that they have a designated train path model showing that there are 24 train paths available each way. At its peak, the SIMTA proposal will require 21-22 paths. As the SIMTA proposal has the durability to service the entire precinct, the impact on the SSFL would therefore be limited. It was concluded, however that further capacity reviews were required by ARTC and the project team as the SIMTA proposal progressed. Additional infrastructure on the main line may be required. This would be staged depending on ARTC's corridor capacity strategy development that would take into account all users between Port Botany and Moorebank.	Section 5.3.2.3 Appendix H *Rail Access Report – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)