




SSI 10038 and SSI 19238057- Sydney Metro response to Independent Audit 05

SM-24-000297962

Applicable to:	Sydney Metro West
Status:	Final
Date of issue:	26 October 2024

CSSI 10038 – Findings from Feb 24 Audit

Item	Relevant phase	Condition	Type	Requirement	Finding	Recommended or completed action ¹	By whom	Status ²	Proponent Response
10038_Aug24_1	Phase F (WTP)	D116	Observation	Before undertaking any works and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with LandCom's Managing Urban Stormwater series (The Blue Book).	<p>Observation: The Auditor notes that the ER has raised findings in relation to erosion and sediment controls at the Clyde sites in May, June, July and August 2024 (including observations from the previous audit period in October 23, November 23, December 23, January 24, February 24). During the site inspection at the Clyde MSF site, it was observed that some sediment was still being tracked on to Unwins Road despite additional controls having been applied, including: establishment and use of internal haul road to prevent intrasite spoil movements between Rosehill and Clyde MSF East and West having to use the local road network, street sweepers on rotation and stormwater pits were protected, sealed access and egress and wheel baths.</p> <p>The Auditor also observes that several stormwater pits at Rosehill that flow to Duck River had controls that required maintenance to ensure they function properly.</p>	<p>It is evident that despite the additional controls being implemented at Clyde MSF and Rosehill material tracking continues to occur and, therefore, effort to actively control this issue on a day-to-day basis needs to continue.</p> <p>The controls at the stormwater pits at the Rosehill TBM site that flow to Duck River need to be replaced / upgraded.</p>	WTP (GLC)	OPEN	<p>The Proponent provides the following response from GLC.</p> <p><i>Erosion and Sediment Controls throughout the WTP are implemented consistent with LandCom's Managing Urban Stormwater series (The Blue Book). As with any earthworks site, ESCP is a day-to day activity, that is continually being monitored, maintained and refined.</i></p> <p><i>Stormwater pit protection at Rosehill laydown area has been upgraded/replaced since the audit date.</i></p> 

¹ The recommended or completed actions do not preclude the requirement to notify the Department of any actual non-compliance within 7 days of becoming aware of them in accordance with A45/A46.

² Status of finding and action according to the Auditor at the time of finalizing the Report.

CSSI 19238057 - findings from the Independent Audit (February 2024)

Item	Condition	Type	Requirement	Finding	Recommended or completed action ³	By Whom	Status ⁴	Proponent Response
19238057_Aug24_1	D29	Observation	<i>Detailed Noise and Vibration Impact Statements (DNVIS) must be prepared for work that may exceed the NMLs, vibration criteria and / or ground-borne noise levels specified in Conditions D25 and D26 at any residence outside construction hours identified in Condition D21, or where receivers will be highly noise affected. The DNVIS must include specific mitigation measures identified through consultation with affected sensitive land user(s) and the mitigation measures must be implemented for the duration of the works. A copy of the DNVIS must be provided to the AA and ER before the commencement of the associated works. The Planning Secretary and the EPA may request a copy (ies) of the DNVIS.</i>	<p>Observation: The Auditor observes that the DNVIS for OOH tunnelling prior to shed completion at Pyrmont East (dated 29 May 2024, endorsed 07 June 2024) is unclear with respect to the timing required for site noise level checks. This means that the Auditor is unable to state definitively whether the DNVIS was implemented in full on 22 and 23 July 2024.</p> <p>At 20:12 on 22 July 2024 JCG conducted site noise level checks during dust scrubber commissioning, 42 minutes after switching on a dust scrubber (used to support tunnelling) at 19:30. The Auditor observes that this occurred outside of standard construction hours (on the basis that shed construction was proceeding during standard hours), and prior to the commencement of modelled OOHW (cavern excavation and support activities in total).</p> <p>The DNVIS describes the proposed approach to undertaking the proposed OOHW. The following statements from the DNVIS are of note:</p> <p>Section 2.1: ‘The commencement of excavation of the station cavern will be undertaken outside standard construction hours (refer to Section 2.2) to allow the shed construction to continue during the standard hours.’</p> <p>Section 2.1: ‘Table 2.1 presents the list of plant proposed to be used for these works and their assumed sound power levels.’ [Table 2-1 shows that the proposed OOHW assessed were cavern excavation and support activities in total].</p> <p>Section 2.2.1: ‘The Stage 2 OOHW will allow the shed construction to continue during the day with minimal disruption and will reduce the overall construction program compared to if works were limited to standard construction hours until the acoustic shed is completed.’</p> <p>Section 4.1.1: ‘Measurement would be conducted on site prior to the commencement of the proposed OOHW, to confirm that measured construction noise levels are consistent with the predicted noise levels presented in this report (refer to Section 4.2.4).’</p> <p>Section 4.2.4 (1): ‘Site noise level checks: Prior to the commencement of OOHW, noise monitoring would be undertaken on site to confirm plant sound power levels are consistent with (or below) the assumptions in Table 2-1. Where noise levels are above the levels in Table 2-1, mitigation and/ or management measures would be implemented to reduce noise levels accordingly.’</p> <p>Section 4.2.4 (2): ‘Initial and ongoing noise checks at receiver monitoring locations: During OOHW, noise monitoring would be undertaken and compared to the</p>	<p>At the time of completing the site noise level checks at 20:12, JCG determined that the scrubber sound power levels were 20-28dB(A) higher than that adopted in the DNVIS. JCG then undertook actions in a manner not inconsistent with Section 10.1 of the Noise and Vibration Management Sub-plan. The scrubber was switched off at 21:00 to address sensor issues and look at additional mitigation measures to reduce noise. At 22:00 the scrubber was switched back on for 1 hour to obtain additional verification monitoring data on two fan settings (full and reduced). The additional monitoring data was compared against the predictions in the DNVIS and found that noise impacts to be:</p> <ul style="list-style-type: none"> • 2.7 – 8.4 dB(A) above that predicted under reduced fan mode, and • 16.3 – 18.7 dB(A) above that predicted under full fan mode. <p>At 00:25 (23 July 2024) road header tunnelling commenced, along with operation of the scrubber on reduced fan mode until 02:30 at which time tunnelling and scrubber operation was shut-down for the shift.</p> <p>Seven complaints were received between 22 and 23 July 2024 regarding the works.</p> <p>During the day shift on 23 July 2024 additional silencers and an elbow were fitted to the scrubber and at 19:00 monitoring confirmed that the additional controls lowered the scrubber sound power level to that which was predicted in the DNVIS.</p> <p>Works continued as planned in the DNVIS from that point forward, and no further complaints were recorded (during the audit period) in relation to the works.</p>	JCG	CLOSED	The Proponent has no further comment on this Observation

³ The recommended or completed actions do not preclude the requirement to notify the Department of any actual non-compliance within 7 days of becoming aware of them in accordance with A46/A47.

⁴ Status of finding and action according to the Auditor at the time of finalizing the Report.

Item	Condition	Type	Requirement	Finding	Recommended or completed action ³	By Whom	Status ⁴	Proponent Response
				<p><i>predicted noise levels and the noise management levels for the evening period (and night period, if practicable). Site inspection should be undertaken to confirm that all reasonable and reasonable mitigation measures detailed in Section 4.2.1 above and Section 9.3 of the DNVIS have been implemented.'</i></p> <p><i>Section 4.2.4 (3): 'Establish intermediate monitoring locations on or near site works for verification monitoring: If ambient noise from non-project related sources cannot be excluded from the measurements, this will complicate the ability to verify noise from the OOH works. Intermediate locations will then be established on or near site to allow monitoring of construction noise with minimal influence from other noise sources. The intermediate locations will be selected during the site noise level checks to ensure that they are representative of construction noise propagating towards the nearest residential receivers. Noise levels will be predicted to the intermediate locations for comparison with measured noise levels.'</i></p>				
19238057_Aug24_2	D77	Non-compliance	<p><i>Construction Parking and Access Management</i></p> <p><i>All vehicles associated with the CSSI (including light vehicles and Heavy Vehicles) must be managed to:</i></p> <p><i>a) minimise parking on public roads;</i></p> <p><i>b) minimise idling and queueing on state and regional roads;</i></p> <p><i>c) not carry out marshalling of construction vehicles near sensitive land user(s);</i></p> <p><i>d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and</i></p> <p><i>e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMPs</i></p>	<p>Non-compliance: According to JCGs Non-Adhere VMP Register, there were at least 10 x records showing that a section of Elizabeth Street that is not part of an approved haul route under a CTMP, was used to access Hunter Street site between 11 March 2024 and 15 May 2024.</p> <p>The Auditor further observes that a request was made as to why JCG did not consider this to be a non-compliance with D77e). The auditees responded by stating that 'details of the VMP register will be included in the six monthly monitoring report as described in the Construction Parking and Access Strategy (CPAS)– Stage 1 – Pyrmont & Hunter Street Section 7.3 Reporting. This section of the CPAS requires the reporting of non-conformances and corrective actions as a summary in the six monthly monitoring report.'</p> <p>The 6 monthly CPAS Monitoring Report for Oct 23 – Mar 24 does not include any assessment of compliance with approved haul routes (despite indicating in Table 1 that the Report would address this requirement). The CPAS Monitoring Report simply concludes 'Efforts will continue in the education of workforce about project restrictions and improved communication of project-approved haulage routes and parking restrictions.'</p> <p>It is therefore unclear if further contraventions of the nominated haul routes during the audit period that were intended to be reported in the 6 monthly CPAS Monitoring Report for Oct 23 – Mar 24.</p>	<p>The Auditor refers to finding 19238057_Feb24_1 from the February 2024 audit and the action to deliver training to those responsible for managing compliance with the haulage routes. It is recommended that repeat training be delivered to the team and the JCG haulage companies.</p> <p>JCG also proposes to record details of planned protests and police action as these activities could result in trucks being diverted to alternate routes particularly in the CBD. If this is the case, then the CTMPs should be updated to establish an agreed process to be followed should such events occur.</p>	JCG	OPEN	<p>The proponent provides the response below from JCG.</p> <p><i>Training was completed in March 2024. Training of drivers of haulage vehicles will be conducted as outlined in the CTMP.</i></p> <p><i>The CTMP will be reviewed to include a process for recording instances of planned protests and police action that would trigger the use of alternate haul routes.</i></p> <p><i>Future CPAS 6 monthly reports will include details of instances where spoil haulage vehicles have been identified as not adhering to the nominated haulage routes and the action taken to manage this.</i></p>

Item	Condition	Type	Requirement	Finding	Recommended or completed action ³	By Whom	Status ⁴	Proponent Response
19238057_Aug24_3	D78	Observation	<p><i>A Construction Parking and Access Strategy must be prepared to identify and mitigate impacts resulting from on- and off-street parking changes during construction. The Construction Parking and Access Strategy must include, but not necessarily be limited to:</i></p> <p><i>j) provision of reporting of monitoring results to the Planning Secretary and Relevant Council(s) at six (6) monthly intervals.</i></p>	<p>Observation: Whilst the 6 monthly CPAS Monitoring Report for Oct 23 – Mar 24 was issued to all the relevant stakeholders, Section 7.3 of the CPAS – Stage 1 – Pyrmont & Hunter Street Worksites (JCG, 20 August 2024) does not identify the Planning Secretary as a recipient of the 6 monthly monitoring reports, despite this being required by D78j).</p>	<p>Update the CPAS – Stage 1 – Pyrmont & Hunter Street Worksites to identify the Planning Secretary as a recipient of the 6 monthly CPAS Monitoring Report.</p>	JCG	OPEN	<p>The proponent provides the response below from JCG.</p> <p><i>The 6 monthly CPAS monitoring report (March – Sept 2024) addresses this requirement. The CPAS monitoring reports are submitted by JCG to Sydney Metro (Proponent) to provide to the Planning Secretary and relevant councils.</i></p>
19238057_Feb24_1	A46	Observation	<p><i>The Planning Secretary must be notified in writing via the Major Projects website within seven (7) days after the Proponent becomes aware of any non-compliance with the conditions of this approval.</i></p>	<p>Observation: A non-compliance was identified by Sydney Metro against D73 for trucks not using the nominated haulage routes between April and September 2023. This non-compliance was not notified until Sydney Metro Environment Team had reviewed the CPAS monitoring report (~3-6 months after the events occurred).</p> <p>The Auditor understands that the Project operates real-time tracking of heavy vehicles, and the system alerts the Project team of events whereby trucks do not adhere to nominated haul routes. Therefore, the Auditor is of the view that the Project team ought to have been aware of a breach at the time it occurred and thus should have reported this at that time.</p>	<p>The non-compliance was reported to the Department after the fact in accordance with A46/A47.</p> <p>JCG indicated that an environmental approval training session with Traffic Manager / Construction Integration Manager has been scheduled for 14 March 2024 to reinforce their responsibilities in identifying non-compliances with traffic related conditions.</p>	JCG	CLOSED	<p>The Proponent has no further comment on this Observation</p> <p>The training was delivered as recommended. Refer to finding 19238057_Aug24_2 in Table 15 regarding adherence to haul routes for the March to August 2024 audit period.</p>