

Subject: FW: Barangaroo Central (SSD 6533).

From: Robert Marr
Sent: Monday, 16 November 2015 4:02 PM
To: Michele Nettlefold
Subject: RE: Barangaroo Central (SSD 6533).

Michelle.

I refer to the letter from your Cameron Sargent dated 29 October 2015 seeking EPA comment on an addendum to the RTS relating to the remediation of Block 5 at Barangaroo (SSD 6533) – I apologise for the delay in replying. The EPA has considered your request and offers the following comments:

Waste.

EPA considers that under the heading of *Waste Management* there are opportunities for improvement in the assessment of contaminated material treatment and disposal; this was a requirement in the SEARs and is necessary to demonstrate the excavated contaminated material can be appropriately dealt with. EPA would appreciate confirmation from the proponent that:

- (i) there are appropriate technologies to treat any generated material, and
- (ii) disposal sites/methodologies will not result in any adverse environmental or human health impacts.

Air.

EPA recommends the following as consent conditions:

- (i) All remediation activities are to be conducted in enclosures fitted with suitable ventilation arrangements and pollution control equipment. The enclosures must be operated under negative pressure and minimise fugitive emission to the maximum extent practicable.
- (ii) Prior to construction and commencement of project operations, a detailed design plan of the proposed Odour Control Structures to be submitted to the EPA. As minimum the plan must include:
 - The nomination of all point source discharge parameters;
 - Emission performance specifications for pollution control equipment. Specifically the emission performance for Volatile Organic Compounds and Polycyclic Aromatic Hydrocarbons; and
 - Proposed monitoring programs for the emission control systems, including arrangements for monitoring activated carbon breakthrough.
- (iii) Prior to construction and commencement of project operations, the proponent must submit a revised Air Quality Verification Assessment to the EPA based on the final design arrangements. The AQIA must:
 - Be conducted in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (the Approved Methods);
 - Assess all key Chemicals of Potential Concern (COPC), specifically Volatile Organic Compounds, Polycyclic Aromatic Hydrocarbons and particulate matter;
 - Incorporate emission performance guarantees/specifications for generators should they be proposed for use;
 - Incorporate all final design information such as point source arrangement and emission performance specifications for proposed controls;
 - Nominate relevant emission concentration limits that reflect proper and efficient operation and are protective of the health and amenity of the surrounding environment; and
 - Incorporate all necessary mitigation measures necessary to demonstrate compliance with the relevant impact assessment criteria as nominated within the Approved Methods.

- (iv) Prior to construction and commencement of project operations, the proponent must prepare and implement an Air Quality Management and Monitoring Plan. The Plan must incorporate as a minimum:
- Proactive and reactive management strategies and for all pollutant emission sources;
 - Key performance indicator(s) for emission controls;
 - Monitoring method(s) including location, frequency and duration;
 - Response mechanisms;
 - Responsibilities;
 - Record keeping; and
 - Compliance reporting.

Note: EPA is happy to discuss the above requirements with the proponent if necessary.

Regards,
Bob

Bob Marr

Senior Regional Operations Officer – Sydney Industry

Metropolitan Branch, NSW Environment Protection Authority

+61 2 9995 6825

robert.marr@epa.nsw.gov.au www.epa.nsw.gov.au  [@EPA_NSW](https://twitter.com/EPA_NSW)

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