



ENVIRONMENT PROTECTION AUTHORITY

Your reference: *Headland Park Main Works Project MOD 4 (MP10-0048 MOD 4)*
Our reference: EF13/5222 – DOC14/148905
Our contact: Bob Marr

Mr Cameron Sargent
Team Leader – Industry Key Sites & Social Projects
Planning and Environment
23-33 Bridge St
SYDNEY NSW 2001

Attn: Sara Roach

Dear Mr Sargent

The Environment Protection Authority (EPA) refers to your letter dated 29 July 2014 seeking comments on the Response to Submissions (RTS) report relating to a request by the Barangaroo Delivery Authority (BDA) to modify Project Approval MP10_0048 (Mod 4) - proposed demolition of the Harbour Control Tower at Barangaroo.

The Environment Protection Authority (EPA) has reviewed the Response to Submissions Report (BDA, July 2014) and accompanying revised Air Quality Management Plan (JBS, 3 July 2014) (AQMP) for the Harbour Control Tower Demolition MP10_0048 MOD 4 (the Proposal). You will recall that EPA's previous submission sought clarification on a number of issues mainly relating to air emissions and asbestos management.

EPA now offers the following comments:

1) EPA advises the revised AQMP generally addresses the air issues raised by EPA during the Public Exhibition review of the Proposal.

In response to EPA's comments the AQMP has been revised to:

- (i) provide clarification that project works and mitigation strategies are designed to minimise dust (including asbestos) emissions to the maximum extent practicable;
- (ii) provide clarification that for asbestos, accredited contractors will provide best practice guidance and/or supervision for the removal of asbestos containing materials; and
- (iii) include an Asbestos Management Plan (AMP) for the Proposal.

2) Response mechanisms to manage possible friable asbestos impacted material should be clarified.

With respect to the management of asbestos impacted materials EPA notes:

- (i) the AMP refers to specific requirements for working with non-friable asbestos impacted materials;
- (ii) a licenced asbestos removal contractor will complete works associated with any asbestos impacted materials at the site; and

(iii) a site specific Asbestos Removal Control Plan (ARCP) will be prepared by the licenced asbestos removal contractor, prior to any asbestos works being completed. [ARCP's identify control measures to be implemented to prevent risk during asbestos removal work].

EPA notes also:

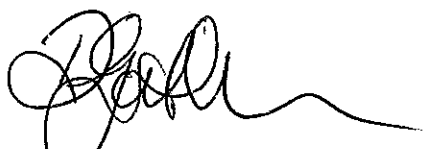
(i) friable asbestos impacted materials have not been identified at the Harbour Control Tower (HTC) (EA, Section 5.11) and consequently are not expected to be encountered at the HTC (AMP, Section 5.2); however,

(ii) in the event friable asbestos impacted materials are encountered, the AMP refers to the requirement for validation sampling and clearance airborne asbestos monitoring (Sections 5.2, 6.2 and 6.3). The AMP however does not refer to work requirements and/or contingency plans to manage the removal of friable asbestos impacted materials, in the event they are encountered.

In light of the above **EPA recommends the AMP is amended to clarify the work requirements and contingencies that will be implemented in the event friable asbestos impacted material is encountered.** Otherwise EPA has no objection on environmental grounds to P&E approving the modification request should it decide to do so.

As you will be aware activities at the Barangaroo site are regulated by conditions attached to Environment Protection Licence number 13336 and many of the short-term environmental or amenity impacts associated with this project can be readily regulated by the EPL. Nonetheless, the proponent will need to ensure that all mitigation measures outlined in the EIS, and required in P&E's final Approval will need to be carefully implemented to ensure compliance with the EPL (as varied) and other relevant environmental legislation. If you have any queries regarding these matters please contact Bob Marr on 9995 6825.

Yours sincerely



19 August 2014

DAVID GATHERCOLE
Acting Unit Head Sydney Industry
Environment Protection Authority