



ENVIRONMENT PROTECTION AUTHORITY

Your reference *Headland Park Main Works Project MOD 4 (MP10-0048 MOD 4)*
Our reference: EF13/5222 – DOC14/58603-01
Our contact: Bob Marr

Mr Cameron Sargent
Team Leader – Industry Key Sites & Social Projects
Department of 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 28 April 2014 seeking comments on a request by the Barangaroo Delivery Authority (BDA) to modify Project Approval MP10_0048 (Mod 4) relating to the proposed demolition of the Harbour Control Tower at Barangaroo.

In previous correspondence about this proposal, the EPA flagged that the tower demolition activity has potential to result in short-term environmental or amenity impacts (specifically dust emissions, noise, vibration and asbestos management). The EPA has reviewed the application and supporting information and the EPA's detailed comments on the proposal are contained in the appended document "Attachment A". The EPA considers that on the basis of the information supplied, the EPA believes that the proposed management and control strategies as outlined in the Environmental Assessment (EA), where appropriately implemented, should be sufficient to minimise the risk of adverse air quality impacts off site. Further, in relation to noise and vibration, EPA has no additional comment over and above those included in the original project approval (Condition B22). The EPA recommends however, that the proponent provides some minor clarification on air emission control best practice process-design and matters relating to an Asbestos Management Plan (details in Attachment A).

In summary, once the above clarifications have been supplied, the EPA has no objections to Department of Planning and Environment (P&E) approving the modification request should it decide to do so.

You will also be aware that the BDA is the holder of Environment Protection Licence (EPL) 13336 and the EPA will require that any subsequent works relating to this Modification Application will need to be done to ensure compliance with the conditions attached to the EPL.

If you have any queries regarding these matters please contact Bob Marr on 9995 6825.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Sheehy'.

2/6/2014.

GREG SHEEHY
Manager Sydney Industry
Environment Protection Authority

ATTACHMENT A

Environment Protection Authority (EPA) submission on a request by the Barangaroo Delivery Authority (BDA) to modify project Approval MP10_0048 (Mod 4) relating to the proposed demolition of the Harbour Control Tower at Barangaroo.

EPA provides comment on:

1. Air emissions;
2. Noise and Vibration; and
3. Waste Management

1. AIR

The EPA has reviewed the Proposal including relevant documents on air management issues such as *Harbour Control Tower Removal Works – Air Quality Management Plan (AQMP)* (JBS Environmental, November 2013). The following issues have been identified.

The proposed range of air pollution mitigation measures and strategies should be sufficient to prevent adverse impacts at nearby receptors.

The AQMP provides details of specific management measures (and their implementation) and contingencies designed to address the risks associated with emission sources and the emission of dust and asbestos. The AQMP includes a reactive management component for air quality management.

Specific measures in relation to asbestos removal are also included in the AQMP. Suspected asbestos containing materials will be identified and sampled, and if confirmed to contain asbestos, removed by licensed asbestos personnel.

The monitoring strategy proposed for the project is generally consistent with, or the same as, that currently implemented and proven to be effective at mitigating emissions from other Headland Park works. Project specific monitoring, in addition to that currently being undertaken at the Headland Park site, includes:

- hourly rounds of real-time DustTrak (PM₁₀ as a 10 minute average) monitoring at relevant locations around the site; and
 - daily monitoring for asbestos during periods where asbestos handling is occurring.
- **The EPA advises that the proposed management and control strategies, where appropriately implemented, should be sufficient to minimise the risk of adverse air quality impacts off site.**
- **The EPA notes that if Project Approval is granted by Planning and Environment (P&E), the project AQMP should be referenced in Condition E3.1 of the existing Environment Protection Licence (EPL) (in addition to the existing Air Quality Management Plan for Headland Park Works).**

Clarification is required to ensure dust and asbestos emissions will be minimised to the maximum extent practicable.

The main air pollutants that may be generated by project activities are dust and asbestos. Adverse health effects that can be associated with exposure to dust and asbestos are well known. In addition, there is currently no evidence to support there being a safe level of exposure to dust or asbestos. The risk of

developing a dust or asbestos related disease increases with exposure, in the case of asbestos - the number of asbestos fibres a person breathes in during their life.

Consequently, in order to minimise the risk of adverse particulate matter (either dust or asbestos) impacts, EPA requires particulate matter emissions to be minimised to the maximum extent practicable through the use of best-practice process design and/or emission controls. This requirement to minimise particulate matter, is a specific project requirement for Headland Park works and is reinforced in EPL Condition E3.1.

However the AQMP does not specifically include as a project objective, aim or goal, the requirement to minimise particulate matter to the maximum extent practicable, despite the proposed mitigation strategies appearing to, in general, be designed to meet this requirement.

- **The EPA recommends that the proponent clarifies project works and air mitigation strategies (described in the AQMP) have been designed to minimise particulate emissions to the maximum extent practicable through the implementation of best practice process-design and emission controls.**

Clarification is required whether an asbestos management plan (AMP) will be prepared for the project.

The EA proposes the development of an asbestos management plan (AMP) for the project, however an AMP has not been provided with the project application.

Details of asbestos management are included in the AQMP and the AQMP does not reference an AMP.

As noted above, the AQMP includes details of management and control strategies to ensure the risk of adverse air quality impacts (including from asbestos) will be minimised.

- **The EPA recommends that the proponent clarifies whether or not a specific AMP will be developed for the project.**

2. NOISE and VIBRATION

- **The EPA supports the application with no change to the conditions in *B22 Noise and Vibration* of the existing Project Approval MP10_0048.**

3. CONSTRUCTION & DEMOLITION WASTE CLASSIFICATION TRANSPORTATION AND MANAGEMENT

- **The EPA supports the application providing that waste management associated with this project is done in accordance with the EPA's brochure titled: *Know your responsibilities: managing waste from construction sites*, which can be viewed at the following link:**

<http://www.environment.nsw.gov.au/waste/manbuildingwaste.htm>

