



Reference: DOC21/820193
Date: 1 October 2021

Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Tahlia Alexander – Principle Planning Officer, Infrastructure Assessments

New High School in Bungendore – SSD-14394209 – Department of Education

I refer to the Department of Planning Industry and Environment's referral of the State Significant Development SSD-14394209 received by the NSW Environment Protection Authority (EPA) on 17 September 2021 by way of the Major Projects Planning Portal. The referral is for the establishment of a new high school in Bungendore (the proposal).

Based on the information provided, the EPA understands that the proposal will not meet the requirements for an Environment Protection Licence under Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act). However, the EPA is the appropriate regulatory authority for the proposal as it is being undertaken by a public authority.

The EPA has reviewed the Environmental Impact Statement (EIS) and the supporting documents and provides detailed comments in Appendix A.

The receiving environment for the proposal is Turallo Creek which form part of the Lake George catchment. As such the EPA considers that a high standard of planning, implementation and operation of sediment and erosion controls will be required to protect the NSW Water Quality Objectives and environmental values of the catchment.

Thank you for discussing the matter with the EPA. If you have any questions or wish to discuss the matter further, please contact Claudine Jeffery or myself on (02) 6229 7002 or at EPA.southopsregional@epa.nsw.gov.au.

Yours sincerely

MATTHEW RIZZUTO
Unit Head – Regional South
Regulatory Operations

Phone 131 555	Fax +61 2 6229 7001	PO Box 622	Level 3	
Phone +61 2 6229 7002	TTY 133 677	Queanbeyan NSW	11 Farrer Place	queanbeyan@epa.nsw.gov.au
	ABN 43 692 285 758	2620 Australia	Queanbeyan NSW	www.epa.nsw.gov.au
			2620 Australia	

Appendix A

Agricultural Plot Management

The EPA notes that the proposal includes the addition of an agricultural plot associated with the high school. Consideration should be given to the management of runoff and erosion from the agricultural plot following the completion of construction activities to ensure there is no impact on the environmental values of the receiving waterways.

Pre-rainfall Procedures

The EPA notes that the EIS and supporting documents outline that additional sediment and erosion controls are to be implemented during wet weather events. The EPA recommends that these additional controls are developed and implemented at a high standard to protect the receiving environment. Typical measures that can be implemented include covering high risk areas with geotechnical material and maintaining site traps and check dams. The EPA further recommends these additional measures are captured as formal procedures and all relevant team members are aware of the procedures.

Use of Flocculant

The EPA notes that the EIS and associated document identify the potential use of flocculants as a means to manage prior to discharge from the site. All feasible and reasonable alternatives to the discharge of water collected onsite to the environment should be investigated with discharge to the environment used as a last resort.

The EPA reminds the proponent the Section 120 of the *Protection of the Environment Operations Act 1997* (POEO Act) applies to any discharges from the proposal site, as such the proponent must ensure that any discharge does not pollute the receiving waterway. The EPA also notes that the receiving waters for the proposal flow into the Lake George catchment, as such the EPA considers a high standard of planning and implementation of sediment and erosion controls, including the use of flocculants will be required to protect the WQOs of the receiving environment.

Where a chemical has the potential to have non-trivial impacts to the environment, it is the responsibility of the person using the chemical to ensure that the potential impacts are fully identified, managed and mitigated. Considering the potential water pollution risks associate with the use of flocculants, all components of a potential discharge from the sediment dam that may impact receiving waters assessed. This will include any chemical used to treat water captured onsite prior to discharge. Should flocculants be used to treat the water captured onsite, information on the product and details on the proposed chemicals to be used and potential impacts must be provided to the EPA for consideration and assessment. Such details should include, but need not be limited to:

- The dose concentration(s) of the proposed flocculant
- A characterisation of the expected quality in terms of all pollutants present that pose a risk of non-trivial harm to the environment should they enter the receiving water
- An assessment of the potential impact of discharges on the environmental values of the receiving waterway with reference to the Australian and New Zealand Guideline for Fresh and Marine Water Quality and the NSW Water Quality objectives
- The degradation rate of the flocculant and the potential for accumulation in bed sediment of the receiving waterways.