



Our reference : DOC13/15119, FIL 13/50

The Director  
Metropolitan and Regional Projects North  
NSW Department of Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Attention: Heather Warton

Dear Ms Warton,

**Bega Valley Health Service Development (SSD 5729-2012)**  
**1614 Tathra Road, Bega, NSW 2550**  
**Environmental Impact Statement**  
**Stage 2: Main Construction Works – EPA Comments**

I refer to the request for comments on the above proposal, received by the Environment Protection Authority (EPA) on 13 March 2013.

The EPA notes that the Environmental Impact Statement addresses the majority of environmental impacts associated with the proposed development. The EPA emphasises that control measures for sediment erosion and runoff need to be implemented during the construction phase of the development due to the proximity of the site to sensitive receivers (nearby wetlands and the Bega River).

Additionally, the EPA suggests that once the fibro fragments (potentially asbestos material) found on site have been removed, sampling may be required to ensure there is no risk of contamination. The EPA recommends the Department of Planning and Infrastructure (DP&I) require that the proponent provide clarification on the issues raised in the attached document (Attachment A).

If you have any queries or wish to discuss this matter further, please contact Sandie Jones, on (02) 62297002 or [queanbeyan@epa.nsw.gov.au](mailto:queanbeyan@epa.nsw.gov.au)

Yours sincerely,

*Sandie Jones* 16/4/13

**DR SANDIE JONES**  
**Head of Operations, South East Region**  
**Environment Protection Authority**

**ATTACHMENT A**  
**Environment Protection Authority Comments – SSD 5729-2012**  
**Bega Valley Health Service Development – Environmental Impact Statement**

**Contamination Assessment**

The EPA has reviewed Appendix J – Contamination Assessment and has the following comments:

In Table 2: Summary of Potential AECS and COPCS under 'Potential weathering of hazardous materials: Description' it states that "asbestos fibres may have been transported onto the site from demolished structures located to the east of the site", however the site/s of these demolished structures were not mentioned in 5.2 'Surrounding Site Features'. It would be beneficial to include these locations.

The EPA suggests that once the fibro fragments (potentially asbestos material) have been moved off site, sampling should be undertaken in the area to ensure there is no risk of contamination.

**Environmental Noise Impact Assessment (ENIA)**

The EPA has reviewed Appendix K – Environmental Noise Impact Assessment and has the following comments:

Further clarification should be provided to:

- the location and height of noise sources on site
- justification for the selected mitigation measures
- percentage of time the equipment operates during the proposed construction hours
- whether there are any concurrent construction works in the vicinity that may contribute additional noise

**Groundwater Assessment**

The EPA has reviewed Appendix T – Groundwater Assessment and has the following comments:

Runoff from site will flow into the wetlands and the Bega River as the topography of the area slopes towards the east of the site. The Bega River alluvial aquifer receives recharge predominantly from the flow in the Bega River and groundwater quality is affected by the quality of the water in the river. Therefore, it is particularly important during the construction phase that adequate control measures are implemented to reduce/divert runoff into the wetlands and Bega River.

It would be beneficial to please provide clear information on all control measures to be employed during construction to reduce runoff and pollution of the nearby water bodies. This should include the type of control measures, as well as maps and diagrams showing the location and number of control measures to be implemented.

In addition, there are conflicting statements provided about the distance of the wetlands from the eastern site boundary that should be rectified:

- 9.2 'NSW Rivers and Estuary Policy (1996)'  
"The proposed development is to be located ... approximately 250m west of the existing wetlands."

- 9.3 'NSW Groundwater Policy Framework Document (1997)'

"Based on aerial photography the closest wetlands appear to be approximately 100m east of the site."

**Soil and Sediment Control Plan (Soil and Water Management Plan [SWMP])**

The EPA has reviewed Appendix U – Soil and Sediment Control Plan and has the following comments:

Further information needs to be provided on all sediment control protection measures. This information must include the type of control measures, as well as maps and diagrams showing the location and number of control measures to be implemented.

In addition to this, information on dust control measures has not been included and needs to be provided.