



Your reference: SSD 6123
Our reference: EF13/5547, SF14/683
Contact: J Goodwin 9995 6838

Peter McManus
Department of Planning and Infrastructure
GPO BOX 39
SYDNEY 2001

Dear Mr McManus

**SSD 6123 – PROPOSED SYDNEY UNIVERSITY CAMPUS IMPROVEMENT PROGRAM – STAGE 1
CONCEPT PLAN**

I am writing to you in reply to your invitation to the EPA to comment on the Environmental Impact Statement (EIS) and associated documents for the staged development of the above proposal.

The EPA notes that it was not consulted in the course of preparing the EIS, albeit that the application is limited in scope to that of a 'concept plan'. Nevertheless, the EPA anticipated that the EIS would include at least a broad assessment of :

- (a) demolition, site preparation and construction-related noise and vibration impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) on surrounding residences and especially on the Royal Prince Alfred hospital;
- (b) demolition, site preparation and construction phase dust control and management,
- (c) demolition, site preparation and construction phase erosion and sediment control and management;
- (d) operational noise and vibration impacts on noise sensitive receivers (especially surrounding residences and Royal Prince Alfred hospital) arising from operational activities such as waste collection, loading dock activities, mechanical services (especially air conditioning plant), fire safety alarm testing, and standby generator testing and operation;
- (e) feasible and reasonable operational noise mitigation and management measures; and
- (f) a detailed assessment of potential site contamination following demolition of existing buildings, and infrastructure, including information about groundwater and any de-commissioned underground fuel storage tank;

On 11 February 2014, the EPA undertook an inspection of the University premises to garner a better understanding of proposed approaches to the re-development projects encompassed by the concept plan. And, whilst the inspection does not form part of the EIS it has assisted the EPA to prepare its comments.

Site contamination

The EPA acknowledges that EIS Appendix J provides details of a Preliminary Site Investigation (PSI) undertaken across the University campus. And, a recommendation that more detailed assessments be undertaken in conjunction with environmental impact assessment in support of applications for specific development work.

However, the PSI was mute on the presence or otherwise of :

- (a) friable asbestos that may have been installed as thermal insulation (example: boiler pipes),
- (b) de-commissioned underground petroleum storage systems, and

Similarly, the EPA notes that Sydney University holds a management licence and a number of university personnel hold user licences under the Radiation Control Act.

The EPA understands from the EIS that the project includes demolition of certain structures within precincts (example: Precinct C Engineering and Precinct E Life Sciences) that might reasonably be expected to involve historic or current activities subject to the provisions of the Radiation Control Act 1990. Accordingly, the EPA considers it prudent to clearly establish the risk from any contamination related to use of the existing buildings over many years and in particular -

- (a) whether demolition waste is likely to contain radioactive material at levels of concern, and
- (b) whether 'regulated material' (within the meaning of the Radiation Control Act 1990) requires disposal.

Extractive activity

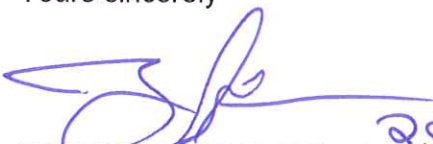
The EPA understands that some of the projects (example: underground car parks, multi-storey building footings) encompassed by the Concept Plan would be expected to involve extensive excavation. The EPA draws your attention to licensing obligations under clause 19 of Schedule 1 to the Protection of the Environment Operations Act 1997 which prescribes a licence threshold for land-based extractive activity involving "... the extraction, processing or storage of more than 30,000 tonnes per year of extractive materials" whether -

- (a) those materials are extracted from or processed or stored at one site or several sites across the University premises, and
- (b) or not the land is contiguous.

The EPA notes that the University's contractor for the Abercrombie Street project currently under way holds environment protection licence 20362 in respect of extractive activity associated with that project.

Should you require clarification of any of the above matters please contact John Goodwin on 9995 – 6838.

Yours sincerely


 25-2-14
FRANK GAROFALOW
 Manager, Metropolitan Infrastructure
NSW Environment Protection Authority