



DOC18/573067-01
SSD 6471

23/8/18

Mr Andy Nixey
Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

Dear Mr Nixey

**SSD 6471 – SYDNEY MODERN – ART GALLERY OF NSW– RESPONSE TO SUBMISSIONS
(RtS) REPORT ADDENDUM**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to comment on the RtS report Addendum (the Addendum) concerning the above project.

Addendum appendices E and F address matters raised by the EPA concerning the seawater heat exchange system and anti-foulant use.

Addendum appendix E indicates that the proponent now proposes to use 'Veolia a32' instead of 'Mexel 432'. The product label for the antifoulant (i.e. Veolia a32) prescribes a maximum application rate of "... not more than 8 millilitres per cubic metre of flow for one hour no more than once per day". The EPA acknowledges that Addendum appendix E indicates the system is to comprise three systems each of which are to be dosed with 2 millilitres of antifoulant per kilolitre of seawater not more than 30 minutes once in any 24 hours. The EPA recommends that any consent condition should adopt the terminology used in the Veolia a32 product label in respect of its application rate (i.e. an application rate per cubic metre of flow).

The EPA notes that the Addendum clarifies that the proponent would implement constant monitoring to ensure that at all times the concentration of Veolia a32 in water discharged from the system is less than 0.5 milligrams per litre.

Addendum appendix E confirms that the Seawater Heat Exchange intake pipework is to be cleaned using a conventional pigging system as per industry standard. The EPA remains unclear how the proponent proposes to dispose of the pigging waste.

The EPA provides the following recommendations:

1. The proponent be required to ensure that any anti-foulant product used in the seawater heat exchange system is registered at the time of use by the Australian Pesticides and Veterinary Medicines Authority (APVMA) for the purpose of a marine growth anti-foulant.

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2. The proponent be required to ensure that the water discharged from the seawater heat exchange system contains less than the concentration of anti-foulant product specified on the pesticides label for that anti-foulant product.
3. The proponent be required to ensure that the seawater heat exchange system intake pipework is pigged not less than twice per year for the purpose of reducing the rate of application of anti-foulant to that system.
4. The proponent be required to design and install an appropriate system for the integrated collection and storage of all waste generated from pigging seawater heat exchange system pipework.
5. The proponent be required to ensure all pigging waste from the seawater heat exchange system is disposed of to sewer or, where such disposal is not approved by Sydney Water Corporation, disposed of at a facility legally able to accept that waste for treatment and proper disposal.

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

Yours sincerely



SARAH THOMSON
Unit Head Operations, Metropolitan Infrastructure
Environment Protection Authority