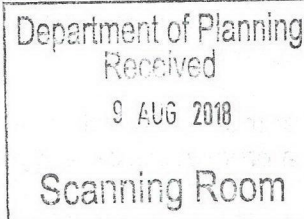


PCU075377

DOC18/536048-07



Department of Planning and Environment  
(Attention: Erin White)  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms White

**Request for Input – SEARs**  
**Imam Ali Primary School, Minto Heights (SSD 9467)**

I refer to your request dated 30 July 2018 for the Environment Protection Authority (EPA) to provide any key issues and assessment requirements for the above development.

The draft SEARs generally appear comprehensive.

The EPA provides the following additional advice to assist in the assessment of this development. These issues have been identified in Attachment A and include:

- Regulatory Matters
- Wastewater Management
- Noise
- Waste
- Contaminated Land Management.

The Office of Environment and Heritage should be consulted for matters relating to other environmental issues, including threatened species, ecologically endangered communities and native vegetation.

If you have questions regarding the above, please phone the contact officer on (02) 4224 4100.

Yours Sincerely



06/08/18

**PETER BLOEM**  
**Manager Regional Operations Illawarra**  
**Environment Protection Authority**

Contact officer: PAUL WEARNE  
(02) 4224 4100

Attachment

## ATTACHMENT A - Additional assessment requirements

### Regulatory Matters

The development must comply with the Protection of the Operations Act 1997 and any associated regulations at all times. The environmental outcomes for the project should be to ensure there is no pollution of waters (including surface and groundwater) and no pollution of land (as defined in the POEO Act).

Under the POEO Act, an environment protection licence is required for sewage treatment systems if it has a processing capacity that exceeds:

- (a) 2,500 persons equivalent, or
- (b) 750 kilolitres per day, whichever is the greater.

The need for an environment protection licence for water protection (under Section 120 of the POEO Act) should also be determined.

Please refer to the following information for further guidance:

|                        |                                                                                                                                  |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| EPA Guide to Licensing | <a href="http://www.environment.nsw.gov.au/licensing/licenceguide.htm">www.environment.nsw.gov.au/licensing/licenceguide.htm</a> |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------|

### Wastewater Management

The background information provided appears to indicate sewer is beyond the area of supply and a concept scheme for the on-site treatment of waste water and effluent utilising Membrane Bioreactors (MBR) is proposed.

The SEARS should include assessment requirements for onsite wastewater management. This should include, but not necessarily be limited to, the following matters:

- Describe the catchment including proximity of the development to any waterways and provide an assessment of their sensitivity/significance.
- Provide a description of the receiving waters including surface and groundwater.
- Details on proposed water management at the site.
- Provide information on any water discharges including location, volumes, water quality, monitoring programs and frequency of discharge.
- Describe the nature and degree of any likely impacts that the proposed project may have on the receiving environment. This should include a characterisation of any potential water pollutants at the site, an assessment of impact on receiving waters to ensure water quality outcomes are not compromised and any associated mitigation and management measures.
- Demonstrate that all practical options to avoid discharge have been implemented and environmental impact minimised where discharge is necessary.

Further guidance is available in the following documents:

|                                                                                                                            |                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| National Water Quality Management Strategy: Guidelines for Sewerage Systems - Effluent Management (ARMCANZ/ANZECC 1997)    | <a href="http://www.environment.gov.au/water/policy-programs/nwqms/">http://www.environment.gov.au/water/policy-programs/nwqms/</a>         |
| National Water Quality Management Strategy: Guidelines for Sewerage Systems – Use of Reclaimed Water (ARMCANZ/ANZECC 2000) | <a href="http://www.environment.gov.au/water/policy-programs/nwqms">http://www.environment.gov.au/water/policy-programs/nwqms</a>           |
| Environmental Guidelines for the Utilisation of Treated Effluent by Irrigation (NSW DEC 2004)                              | <a href="http://www.environment.nsw.gov.au/resources/water/effguide.pdf">http://www.environment.nsw.gov.au/resources/water/effguide.pdf</a> |



## Noise

The Noise Policy for Industry (EPA, 2017) has replaced the NSW Industrial Noise Policy.

As the project will be potentially traffic generating, the assessment should consider noise impacts of vehicle movements on current and future receivers. The *NSW Road Noise Policy (2011)* provide further guidance in this regard.

## Waste

The goal of the project should be to ensure waste is managed:

- in accordance with the principles of the waste hierarchy and cleaner production.
- the handling, processing and storage of all materials used at the premises does not have negative environmental or amenity impacts.
- the beneficial reuse of all wastes generated at the premises are maximised where it is safe and practical to do so.
- no waste disposal occurs on site.

The NSW EPA's Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (Dec 2012) provides information on better waste management practice in design, establishment, operation and ongoing management of waste services in commercial and industrial developments. This guideline can be accessed at:

<http://www.epa.nsw.gov.au/warr/BPGuideCIFacilities.htm>.

## Contaminated Land Management

The environmental outcome of the project should be to ensure any contaminated land is identified and appropriately managed, to reduce the risk of harm to human health or any other aspect of the environment.

Whilst it is stated that the land comprises bushland, the risk of contamination from illegal dumping, use of fill on site or other past land uses should be considered.