



Ms Julia Green
Department of Industry and Environment

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By email: julia.a.green@dpi.nsw.gov.au

Dear Ms Green

1 June 2024

MOUNT PIPER TO WALLERAWANG TRANSMISSION PROJECT – SSI-70279722
EPA advice on Secretary's Environmental Assessment Requirements

I refer to your request to the Environment Protection Authority (EPA) to provide input to the Secretary's Environmental Assessment Requirements (SEARs) for the Mount Piper to Wallerawang Transmission Project.

The EPA has reviewed the document *Mount Piper to Wallerawang Transmission Line Upgrade Project – EIS Scoping Report, April 2024*, prepared by Transgrid. The EPA understands the project is being undertaken by Transgrid (trading as the NSW Electricity Networks Operations Pty Ltd), to provide increased transmission capacity between renewable energy operators in the Central-West Orana Renewable Energy Zone and the Greater Sydney region.

The EPA has identified the information it requires to adequately assess the proposal which is contained in Attachment 1. Guidance material is provided in Attachment 2 to assist with the EIS. In summary, the EPA's key information requirements for the proposal include an adequate assessment of:

- Details on the potential environmental impacts arising from the proposed project during construction and its ongoing activities including air, odour, noise and water issues, including cumulative impacts and detailed monitoring and mitigation measures that are proposed to be implemented to prevent or minimise these impacts.
- Details on the management of any waste that is to be produced by the proposal, including the use of any Resource Recovery Orders and Exemptions.
- Details on all sediment and erosion controls proposed to be implemented to prevent or minimise erosion and sediment tracking off-site.

If you have any specific questions regarding this matter, please contact Catherine Booth on (02) 8275 1576 or via email at info@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'SL', written over a light blue horizontal line.

SHERIDAN LEDGER
Manager Operations
Environment Protection Authority

Attachment 1: EPA EIS Requirements – Proposed Mount Piper to Wallerawang Transmission Project
Attachment 2: Guidance Material

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Attachment 1

EPA EIS Requirements – Proposed Mount Piper to Wallerawang Transmission Project

The EIS should address the specific requirements outlined under each heading below and assess in accordance with the relevant guidelines mentioned.

Air quality

The EIS should include a detailed air quality impact assessment (AQIA). The AQIA should:

1. Identify all potential discharges of fugitive and point source emissions of pollutants including dust for all stages of the proposal and assess the risk associated with those emissions. All processes that could result in air emissions must be identified and described. Sufficient detail to accurately communicate the characteristics and quantity of all emissions must be provided. Assessment of risk relates to environmental harm, risk to human health and amenity.
2. Justify the level of assessment undertaken on the basis of risk factors, including but not limited to:
 - a. proposal location;
 - b. characteristics of the receiving environment;
 - c. type and quantity of pollutants emitted.
3. Describe the receiving environment in detail. The proposal must be contextualised within the receiving environment (local, regional and inter-regional as appropriate). The description must include but need not be limited to:
 - a. meteorology and climate;
 - b. topography;
 - c. surrounding land-use;
 - d. ambient air quality.
4. Include a consideration of 'worst case' emission scenarios and impacts at proposed emission limits.
5. Account for cumulative impacts associated with existing emission sources as well as any currently approved developments linked to the receiving environment.
6. Include air dispersion modelling where there is a risk of adverse air quality impacts, or where there is sufficient uncertainty to warrant a rigorous numerical impact assessment. Air dispersion modelling must be conducted in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2005).
<http://www.environment.nsw.gov.au/resources/air/ammodelling05361.pdf>.
7. Demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the *Protection of the Environment Operations (POEO) Act (1997)* and the *POEO (Clean Air) Regulation (2010)*.
8. Detail emission control techniques/practices that will be employed by the proposal. Consideration should be given to dust management techniques where water is unavailable or limited and the development of a Trigger Action Response Plan (TARP).

Noise and vibration

In relation to noise impacts, the following matters should be addressed (where relevant) as part of the Environmental Assessment.

1. Construction noise associated with the proposed development in accordance with the *Interim Construction Noise Guideline* (DECC, 2009).
2. Operational noise from all industrial activities proposed (including private haul roads) to be undertaken on the premises should be assessed in accordance with the *Noise Policy for Industry* (EPA, 2017).
3. Noise from existing or upgraded or new public roads from increased road traffic should be assessed in accordance with the *NSW Road Noise Policy* (DECCW, 2011).

In relation to blasting and vibration, the following matters should be address (where relevant) as part of the Environmental Assessment:

- Vibration from all activities (including construction and operation) to be undertaken on the premises should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (DEC2006).
- If blasting is required for any reasons during the construction or operational stage of the proposed development, blast impacts should be demonstrated to be capable of complying with the guidelines contained in *Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration* (ANZEC, 1990).

Waste and stockpile management

The EIS should:

1. Identify, characterise and classify all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste. All waste must be classified in accordance with EPA's *Waste Guidelines*.
2. Identify, characterise and classify all waste that is proposed to be disposed of to an offsite location, including proposed quantities of the waste and the disposal locations for the waste. This includes waste that is intended for re-use or recycling. All waste must be classified in accordance with the EPA's *Waste Guidelines*.
3. Provide details of how waste and product stockpiles will be handled and managed onsite to minimise pollution, including:
 - Labelling of stockpiles for identification, ensuring that all waste is in clearly identified stockpiled from other types of material (especially the separation of contaminated and non-contaminated waste).
 - Proposed height limits for all waste and product stockpiles to reduce the potential for dust.
 - Procedures for minimising the movement of waste and products around the site to avoid the need for double handling.
 - Where relevant, measures to minimise leaching from stockpiles into the surrounding environment, such sediment fencing, geofabric liners etc.

4. Provide details of how the waste will be handled and managed during transport to a lawful facility. If the waste possesses hazardous characteristics, the Proponent must provide details of how the waste will be treated or immobilised to render it suitable for transport and disposal.

Water

The EIS should:

1. Describe water usage for the proposal including the position of any intakes and discharges, volumes, water quality and frequency of all water discharges.
2. Describe existing surface and groundwater quality. An assessment needs to be undertaken for any water resource likely to be affected by the proposal.
3. Provide a water balance for the development including water requirements (quantity, quality and source(s)) and proposed storm and wastewater disposal, including type, volumes, proposed treatment and management methods and re-use options.
4. Demonstrate that all practical options to avoid discharge have been implemented and environmental impact minimised where discharge is necessary.
5. Describe the nature and degree of impact that any proposed discharges will have on the receiving environment.
6. Assess impacts against the relevant ambient water quality outcomes. Demonstrate how the proposal will be designed and operated to:
 - protect the Water Quality Objectives for receiving waters where they are currently achieved; and
 - contribute towards achievement of the Water Quality Objectives over time where they are not currently being achieved.
7. Where a discharge is proposed that includes a mixing zone, the proposal should demonstrate how wastewater discharged to waterways will ensure the ANZECC (2000) water quality criteria for relevant chemical and non-chemical parameters are met at the edge of the initial mixing zone of the discharge, that any impacts in the initial mixing zone are demonstrated to be reversible.
8. Describe how predicted impacts will be monitored and assessed over time.
9. Assess potential impacts on groundwater and groundwater dependent ecosystems.

10. Detail the erosion and sediment controls to be implemented to minimise erosion and sediment mobilisation at the site which have been designed in accordance with the requirements of the publication *Managing Urban Stormwater: Soils and Construction* (Landcom 2004). The EIS should show the location of each measure to be implemented for the construction and operational phases of the project. The measures to be considered include:

- Sediment traps
- Diversion banks
- Sediment fences
- Bunds (earth, hay, mulch)
- Geofabric liners
- Other control measures as appropriate

ATTACHMENT B: GUIDANCE MATERIAL

Air

Approved methods for modelling and assessment of air pollutants in NSW (2005)

<http://www.environment.nsw.gov.au/resources/air/ammodelling05361.pdf>

POEO (Clean Air) Regulation 2002

<http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+642+2002+cd+0+N>

Noise and Vibration

Interim Construction Noise Guideline (DECC, 2009)

<http://www.epa.nsw.gov.au/resources/noise/09265cng.pdf>

Noise Policy for Industry (EPA 2017)

[http://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry\(2017\).pdf](http://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry(2017).pdf)

Implementation and transitional arrangements for the Noise Policy for Industry

<http://www.epa.nsw.gov.au/publications/noise/17p0293-implementation-transition-noise-pol-industry.pdf>

Assessing Vibration: a technical guideline (DEC, 2006)

<http://www.epa.nsw.gov.au/resources/noise/vibrationguide0643.pdf>

Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration (ANZEC, 1990)

<http://www.epa.nsw.gov.au/resources/noise/ANZECBlasting.pdf>

NSW Road Noise Policy (DECCW, 2011)

<http://www.epa.nsw.gov.au/resources/noise/2011236nswroadnoisepolicy.pdf>

Rail Infrastructure Noise Guidelines (EPA, 2013)

<http://www.epa.nsw.gov.au/resources/noise/20130018eparng.pdf>

Environmental assessment requirements for rail traffic-generating developments

http://www.planning.nsw.gov.au/planningsystem/pdf/guide_infra_orridors_interim.pdf

Waste, Chemicals and Hazardous Materials and Radiation Waste

Environmental Guidelines: Solid Waste Landfills (EPA, 1996)

<http://www.environment.nsw.gov.au/resources/waste/envguidlns/solidlandfill.pdf>

Draft Environmental Guidelines - Industrial Waste Landfilling (April 1998)

<http://www.environment.nsw.gov.au/resources/waste/envguidlns/industrialfill.pdf>

Waste Classification Guidelines (EPA, 2014)

<http://www.epa.nsw.gov.au/wasteregulation/classify-guidelines.htm>

EPA Resource recovery exemptions

<http://www.epa.nsw.gov.au/wasteregulation/recoveryexemptions.htm> 7

Soils

Soil and Landscape Issues in Environmental Impact Assessment (DLWC 2000) Available for purchase at -

<http://www.shop.nsw.gov.au/pubdetails>

Managing urban stormwater: soils and construction, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; B Waste landfills; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC 2008) Vol 1 -

<http://www.environment.nsw.gov.au/resources/water/BlueBookVol1.pdf>

Vol 2 -

<http://www.environment.nsw.gov.au/resources/stormwater/08208soilsconststorm2e.pdf>

Landslide risk management

<http://www.australiangeomechanics.org/resources/downloads/>

Site Investigations for Urban Salinity (DLWC, 2002)

<http://www.environment.nsw.gov.au/resources/salinity/booklet3siteinvestigationsforurbansalinity.pdf>

Local Government Salinity Initiative Booklets

<http://www.environment.nsw.gov.au/salinity/solutions/urban.htm>

Water

Water Quality

<http://www.environment.nsw.gov.au/ieo/index.htm>

ANZECC (2000) Guidelines for Fresh and Marine Water Quality

<http://www.environment.gov.au/water/quality/publications/australian-and-new-zealand-guidelines-fresh-marine-water-quality-volume-1>

Applying Goals for Ambient Water Quality Guidance for Operations Officers –Mixing Zones

<http://deccnet/water/resources/AWQGuidance7.pdf>

Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)

<http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf>