



ENVIRONMENT PROTECTION AUTHORITY

Your reference: *MP10_0023 Mod 4*
Our reference: *DOC12/37030 & DOC12/37263*
Our contact: *Bob Marr*

Ms Heather Warton
Director Metropolitan & Regional Projects North
Department of Planning and Infrastructure
23-33 Bridge St
SYDNEY NSW 2001

Attn: Sarah Roach

Dear Ms Warton

The Environment Protection Authority (EPA) refers to your letter dated 4 September 2012 seeking comments on the application under section 75W of the Environmental Planning and Assessment Act to modify Project Approval (MP10_0023 Mod 3) to permit the installation of a temporary concrete batching plant at Barangaroo. The EPA refers also to the report which supported the application titled *MP10_0023 – Mod 4 (Bulk Excavation and Basement Car Parking) Barangaroo South* prepared by JBA Planning Pty Ltd for Lend Lease (Millers Point) Pty Ltd ("the report").

The EPA has considered your request and offers the following comments:

General:

The EPA acknowledges and endorses the statement in the report that that the temporary concrete batching plant will be managed generally in accordance with the document titled *Best Management Practice (Concrete) Guideline (DECCW 2004)* from the NSW Office of Environment and Heritage.

Water:

Concrete batching plants are generally net users of water but in wet weather particularly, contaminated runoff and wastewater will need to be properly managed. The EPA notes that the proposed operators of the concrete batching plant have identified three areas for water management namely:

- Cementitious (elevated pH) catchment area;
- Turbid 'Dirty' catchment area; and
- First Flush basins.

The EPA notes also that wet weather overflow from the first flush collection system will be diverted to the on-site Water Treatment Plant via the by-pass arrangements. The EPA is satisfied that water management has been satisfactorily addressed in the report.

Noise:

The EPA notes that the acoustic assessment predicts noise exceedances at High Street and Hickson Road residences. The EPA notes also that these exceedances, which are up to 4 dBA, are below the maximum management level of 75 dBA and the proponent expects that the impacts are manageable. The EPA notes

also the comment in the report that the predicted batch plant noise levels at High Street and Hickson Road residences are below measured existing ambient LAeq noise levels at these locations.

The report includes a comment that a review of the cumulative noise impact at residences has been conducted and it has been determined that the addition of the concrete batching plant will not result in an unacceptable increase in construction noise levels at surrounding receivers during the daytime.

The report goes on to say that based on this assessment it has been determined that the operation of the proposed concrete batch plant will not result in an unacceptable noise impact at surrounding receivers.

The EPA notes and agrees that the use of a concrete batching plant will result in a reduced need for concrete haulage trucks on the surrounding road network which will in turn reduce traffic noise levels associated with this activity. The EPA considers however, that cumulative noise impact will need to be carefully managed and the application of all feasible and reasonable noise mitigation measures employed to achieve the Noise Management Levels as described in the revised Noise and Vibration Management Sub-Plan.

Air:

The EPA notes the comment in the report that the operation of the batching plant will result in an overall reduction of potential sources at the Barangaroo site. The EPA notes and agrees with the comment that the largest potential source of dust on a site is wheel generated dust and as such any modification to the number of truck movement would have a significant impact on potential dust emissions. Reactive management arrangements must be implemented to ensure dust associated with the operation of the batch plant is minimised.

As stockpiles can be the source of significant dust emissions, they will need to be properly managed. Stockpiles height will need to be maintained at a level where windblown dust will be prevented. Water sprays or other appropriate dust suppression arrangements will need to be installed operated and maintained to manage potential emissions.

PM10:

The EPA notes the conclusions reached in the assessment of the Basement Excavation activities; there exists the potential for exceedences of the PM10 24 hour average criteria. As a result there is the potential for adverse impacts on surrounding receptors. The operation of the batch plant will need careful management to ensure no additional air quality impacts are generated as a result. Accordingly, The EPA recommends the implementation of a reactive dust monitoring/management program as part of the revised Air Quality Management Plan to protect nearby sensitive receptors

Waste:

The EPA has reviewed the report in relation to waste management and considers that existing waste management arrangements will not be significantly impacted.

Notwithstanding the above, you will be aware that the environmental aspects of activities across the entire Barangaroo site are regulated by conditions attached to Environment Protection Licence number 13336 which is held by the Barangaroo Delivery Authority (BDA). Overall the EPA considers that any environmental impacts arising from this modification can be adequately managed.

In summary the applicant will need to ensure that all relevant Environmental Management Plans are varied to address the potential impacts associated with the installation and operation of the concrete batching plant. However, the EPA has no objection on environmental grounds to the Department of Planning and Infrastructure approving this modification should it decide to do so.

If you have any queries regarding these matters please contact Bob Marr on 9995 6825.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Greg Sheehy', with a stylized flourish at the end.

17/9/12

GREG SHEEHY
Manager Sydney Industry
Environment Protection Authority