



Your reference: SSD 6746
Our reference: EF13/5547, DOC15/508126-01
Contact: J Goodwin 9995 6838

Ms Megan Fu
Department of Planning and Infrastructure
GPO BOX 39
SYDNEY 2001

Dear Ms Fu

SSD 6746 – UNIVERSITY OF TECHNOLOGY SYDNEY – BLACKFRIARS PRECINCT RESEARCH BUILDING CONCEPT PROPOSAL EIS

I am writing to you in reply to your invitation to the EPA to provide comments on the EIS for the above proposal.

The EPA requests that these comments be read in conjunction with its letter (and attachment) dated 3 November 2014 concerning the SEARs for the project, excepting that:

- (a) section 2.6 to Attachment A no longer applies; and
- (b) the waste regulation and guidance material has been amended (see below).

The EPA notes that EIS Table 2 indicates that the proponent intends to defer assessment of noise, vibration and other potential environmental impacts raised by the EPA until a later stage of the development assessment process. Thus, the EPA is unable to comment on site specific construction and operational impacts of the proposal.

However, the EPA notes that EIS Table 2 (p.25) indicates that there will be no activities warranting a change to the University's radiation management licence.

Site contamination

The EPA understands that the University holds a separate development consent for a child care facility on the development site. EIS Appendix 14 indicates that the site is contaminated by various pollutants at levels in excess of the relevant health assessment criteria. The EPA understands that the proponent has engaged a site auditor accredited under the Contaminated Land Management Act. And that, the auditor has issued a Section B site audit statement for the site. The EPA notes that the site auditor has certified that subject to certain specified actions, including 'contain and cap' contaminants, the site can be made suitable for the proposed child care activity.

Recommendation

The proponent be required to provide a Section A site audit statement issued by an EPA accredited site auditor determining site suitability for the proposed land uses.

Asbestos

The EPA understands that asbestos was not identified in fill material on the site during the phase 2 site investigation. However, EIS Appendix 14 acknowledges the prospect that asbestos material may be found in fill material during bulk excavation. The EPA anticipates that asbestos may be encountered during proposed demolition of any existing structures on the development site.

EPA guidance material concerning the handling, transport and disposal of asbestos wastes is available via the following link to its web-site.

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

Recommendation

The proponent be required to satisfy the requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 'asbestos wastes' and to develop and implement an unexpected asbestos finds protocol for the site.

Recommendation

The proponent be required to consult with SafeWork NSW concerning the handling of any asbestos material encountered on the site.

Recommendation

The proponent be required to ensure all waste generated during the project is assessed, classified and managed in accordance with the "*Waste Classification Guidelines Part 1: Classifying Waste*" (Environment Protection Authority, November 2014) available via the following link to the EPA web-site.

<http://www.epa.nsw.gov.au/resources/wasteregulation/140796-classify-waste.pdf>

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

Yours sincerely



MIKE SHARPIN
Acting Manager, Metropolitan Infrastructure
NSW Environment Protection Authority