



Our reference: EF15/9059, DOC 15/427482-02
Contact: John Goodwin

Megan Fu
Department of Planning and Environment
GPO BOX 39
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Dear Ms Fu

SSD 7058 – BLACKTOWN HOSPITAL REDEVELOPMENT STAGE 2 CONCEPT PROPOSAL AND ENABLING WORKS EIS

I am writing to you in reply to your invitation to the EPA to comment on the EIS for the above mentioned stages of the Blacktown Hospital redevelopment project. The EPA notes that the EIS does not encompass clinical services building construction, commissioning or operation.

The EPA requests that these comments are read in conjunction with the EPA's letter (and attachment) dated 26 May 2015 concerning the SEARs for the project, excepting that asbestos wastes are now subject to Part 7 to the Protection of the Environment Operations (Waste) Regulation 2014.

The EPA has identified the following site specific concerns based on the information in the Environmental Impact Statement as obtained from the Department's Major Projects web site:

- (a) the need for detailed assessment of potential site contamination (particularly of areas inaccessible at the time of the preliminary site investigation) and engagement of an accredited site auditor;
- (b) handling, transport and disposal of any asbestos waste encountered on site during site preparation, demolition, bulk earthworks, construction and construction-related activities;
- (c) site preparation, demolition, bulk earthworks, construction and construction-related noise and vibration impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work);
- (d) site preparation, demolition, bulk earthworks, construction and construction-related dust control and management; and
- (e) site preparation, demolition, bulk earthworks, construction and construction-related erosion and sediment control and management, including appropriate measures to ensure a seamless transition from enabling works to building construction without compromising environment mitigation and management measures;

The EPA notes the following additional matters concerning the EIS.

1. noise and vibration (standard hours)

The EPA notes with concern that EIS section 3.9 proposes the undertaking of noisy activities including site preparation, demolition, bulk earthworks, construction and construction-related activities after 1.00 pm on Saturdays. The EPA does not accept the suggestion in section 5.1 of EIS Appendix I that the Interim Construction Noise Guidelines “... *would be applicable in more sensitive situations - in quiet/rural residential suburbs, for example*”.

Similarly, the EPA does not accept the argument that productivity considerations in and of themselves offer adequate justification for undertaking noisy work outside the recommended standard hours. Instead, the EPA anticipates that the above mentioned noisy activities would only be undertaken during the recommended standard hours as set out in Table 1 to Chapter 2 of the Interim Construction Noise Guideline, 2009.

The EPA does accept that certain emergency work may need to be undertaken urgently (other than during the standard recommended hours) in order to avoid –

- loss of life,
- damage to property, or
- environmental harm.

The EPA acknowledges that certain oversize plant and equipment may be subject to RMS travel time restrictions. However, the EPA considers that all unloading of oversize plant or equipment onto the site and all loading of oversize plant or equipment for removal from the site should be undertaken during standard hours.

2. noise and vibration (intra-day respite periods)

The EPA is aware from long experience that certain construction activities (identified in Interim Construction Noise Guideline section 4.5) have proven to be particularly annoying and intrusive to nearby residents. The EPA anticipates that site preparation, demolition, bulk earth works, construction and construction-related activities generating noise with particularly annoying or intrusive characteristics would be subject to a regime of intra-day respite periods, where –

- (a) they are only undertaken over continuous periods not exceeding 3 hours with at least a 1 hour respite every three hours, and.
- (b) ‘continuous’ means any period during which there is less than an uninterrupted 60 minute respite between temporarily halting and recommencing any of the work referred to in ICNG section 4.5

Accordingly, the proponent should be required to schedule intra-day ‘respite periods’ for those construction activities identified in the Interim Construction Noise Guideline as being particularly annoying to surrounding residents and other noise sensitive receivers.

3. contamination

EIS Appendix H comprises a geotechnical investigation and preliminary environmental site assessment.

EIS Appendix H indicates the presence of a 5,000 litre capacity Underground Petroleum Storage System (UPSS) which the EPA understands is required to serve the hospital emergency generators. And, notes that a previous investigation identifies the likely presence of a 20,000 litre capacity UPSS. The Preliminary Environmental Site Assessment suggests (p.15) in regard to the suspected 20,000 litre capacity UPSS that "The Coffey report could be referring to the 5000L UST". However, the EPA is unclear whether the previous recommendation (by Coffey) to undertake further investigations to locate the 20,000 litre UPSS was implemented.

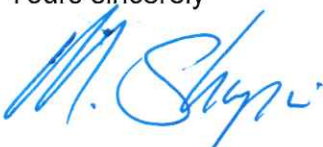
The EPA notes that the Preliminary Environmental Site Assessment also excludes areas occupied by buildings proposed for demolition. And, identifies in Table 9-1 the presence of fill material to a depth of up to 2.5 metres with traces of ash and slag.

The EPA recommended in its previous letter that a site auditor, accredited under the Contaminated Land Management Act, should be engaged. The EPA notes that auditor involvement to review the site contamination assessments would amongst other things-

- provide an opinion on whether the nature and extent of contamination has been appropriately determined, and
- ensure any necessary remedial work is carried out in accordance with best practice and reporting is to the standards required by the EPA.

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

Yours sincerely



1.12.15

MIKE SHARPIN
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Environment Protection Authority

