



Your reference SSI 7024
Our reference: DOC 15/150141-05
Contact: J Goodwin 9995 6838

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

Dear Ms Fu

SSD 7024 – ST GEORGE HOSPITAL REDEVELOPMENT STAGE 2 – ACUTE SERVICES BUILDING EIS

I refer to the request from the Department of Planning and Environment (DP&E) to the Environmental Protection Authority (EPA) dated 24 June 2015, to provide comments on the Environmental Impact Statement (EIS) for the above project.

The EPA has reviewed the EIS and provided comments and recommendations in relation to the conditions of approval for the key issues of air quality, water quality and noise (see attached).

If you wish to discuss any of the issues raised in this letter, please contact John Goodwin on 9995 6838.

Yours sincerely



10.8.15

Peter Morral
Acting Unit Head Metropolitan Infrastructure
NSW Environment Protection Authority

Encl. EPA's submission on the Environmental Impact Statement for the St George Hospital Redevelopment Stage 2 – Acute Services Building (SSD 7024)

Department of Planning
Received
12 AUG 2015
Scanning Room

EPA's submission on the Environmental Impact Statement for the St George Hospital Redevelopment Stage 2 – Acute Services Building (SSD 7024)

AIR QUALITY

Recommendation

The environmental impacts associated with off road diesel equipment can be a major source of fine particles. The EPA recommends that the proponent assess the environmental impacts associated with heavy vehicles including off road diesel equipment and plant used in the construction of the project. This should include but is not limited to:

- Compliance with relevant and current emission standards as prescribed in Australian Design Rules for heavy duty engines and vehicles.
- Strategies for minimising air emissions from off road diesel equipment including but not limited to graders, bulldozers, loaders etc.
- Confirmation that all off road diesel equipment will meet best available diesel emissions standards or be fitted with an appropriate diesel exhaust treatment device where possible.

Recommendation

The proponent should commit to:

- Minimising dust emissions from the site, and
- Preventing dust emissions from the site.

NOISE AND VIBRATION

Acoustic Assessment

Reference is made to the acoustic assessment undertaken by Acoustic Logic (document reference 20150944.1/2207A/R0/OF). The EPA raises the following concerns:

- Background monitoring appears to have been taken at two locations: Gray Street in 2012 and 16 Hogben Street, Kogarah in 2014. Both sets of measurements do not appear to meet the NSW Industrial Noise Policy (INP) requirements for 7 days of valid data.
- The Gray Street Noise Monitoring Location 1 in the aerial photograph on page 5 is not a residential location and the noise logging data in Appendix 1 indicated that the night-time L90 levels may have been influenced by plant operating in the vicinity.
- The Hogben Street Noise Monitoring Location 2 in the aerial photograph on page 5 is in a Mixed Use zone and its relevance to the assessment is not clear.
- As the background noise level measurements do not appear to have been undertaken in accordance with the INP the assessment criteria derived for the development may be inappropriate. The background monitoring results were used as the basis for assessing construction and operational noise impacts.

Recommendations

The EPA recommends the proponent either:

- Undertake background monitoring measurements again in accordance with the INP including 7 days of valid data. Measurements should be taken at the potentially most affected residences and other sensitive receivers impacted by the development (both the new Acute Services Building and the extension to the car park on Gray Street). The following actions should then be undertaken:

- The predicted impacts of the development should be assessed against the new background monitoring data.
- Predicted exceedances of the relevant INP and Interim Construction Noise Guidelines (ICNG) criteria should be addressed. All feasible and reasonable mitigation measures should be implemented to meet the relevant criteria. The INP and ICNG provide guidance on mitigation measures.

OR:

- As an alternative to undertaking new background monitoring measurements the proponent may choose to accept the EPA's nominated night time criterion of 40dBA Leq(15min). Plant and equipment associated with the proposed redevelopment (e.g. air conditioning, chillers, cooling towers, fans, substations, and generators or back-up generators) would then need to be designed, and operate, so that noise as a result of their operation does not exceed a total noise level of 45dBLAeq(15min) at the potentially most affected noise sensitive receiver. This includes with the addition of any applicable modifying factor corrections, as per Section 4 of the INP.

Construction Management Plan

Section 15.1 of Appendix J Preliminary Construction Management Plan (p.9) states:

Noise from any of the site areas will not exceed the limits set-out in the Noise Control Act 1975. No machine will works outside the normal working hours previously described, unless prior approval has been granted by the local consent authority.

Demolition and excavation works shall comply with Australian Standard 2436-1981 "Guide to Noise Control on Construction, Maintenance and Demolition Sites".

The Noise Control Act 1975 has been repealed and Australian Standard 2436-1981 has been superseded.

Recommendation

The EPA recommends construction be undertaken in accordance with:

- the Interim Construction Noise Guideline (ICNG) (2009), and
- Assessing Vibration: a technical guideline (2006).

Construction Hours

Hours of construction are provided in Section 5 of Appendix J Preliminary Construction Management Plan (p.4). The proposed construction hours for Saturdays are 7:30am to 3:30pm. This is starting half an hour earlier and finishing two and a half hours later than the standard construction hours provided in the ICNG. The EPA is concerned that clear justification for these out of hours works has not been provided and the proponent does not appear to have undertaken consultation, regarding extended construction hours, with surrounding residents or St Patrick's Primary School.

Recommendation

The proponent be required to:

Comply with the standard construction hours provided in Table 1 of Chapter 2 of the ICNG except in the circumstances outlined below and extrapolated on in part 2.3 of the ICNG:

The five categories of works that might be undertaken outside the recommended standard hours are:

- *the delivery of oversized plant or structures that police or other authorities determine require special arrangements to transport along public roads*
- *emergency work to avoid the loss of life or damage to property, or to prevent environmental harm*
- *maintenance and repair of public infrastructure where disruption to essential services and/or considerations of worker safety do not allow work within standard hours*
- *public infrastructure works that shorten the length of the project and are supported by the affected community*
- *works where a proponent demonstrates and justifies a need to operate outside the recommended standard hours.*

Queuing and idling construction vehicles

Community concerns may arise from noise impacts associated with the early arrival and idling of construction vehicles at the development site and in the area surrounding the site.

Recommendation

The proponent be required to ensure construction vehicles do not arrive at the project site or in surrounding areas outside approved construction hours.

WATER QUALITY

In Section 5.9 of the Development Application and Environmental Impact Statement (p.51) it states:

A Construction Management Plan (CMP) will be prepared by the Main Contractor appointed for the ASB project and will address a range of environmental control measures to be considered during the construction process including sediment, erosion and dust.

Recommendation

The proponent provide an erosion and sediment control plan developed in accordance with Managing Urban Stormwater Soils and Construction, 4th Edition published by Landcom (the 'Blue Book')