



Our reference: DOC15/48472-01

Ms Natasha Harras
Team Leader – Regional Assessments
Department of Planning and Environment
23-33 Bridge Street, Sydney, NSW, 2000

Dear Ms Natasha Harras,

I refer to the request for the EPA's input to a Section 75W modification application for the Tooheys Brewery at 29 Nyrang Street, Lidcombe (MP 06_0303 MOD 6), received by the Environment Protection Authority (EPA) on 1 February 2016.

In regards to the proposed modifications, the EPA's focus relates to the associated potential noise, water, air and waste impacts in accordance with legislative requirements outlined in the *Protection of the Environment Operations Act 1997* (POEO Act). The proponent should take all reasonable and practical measures to minimise impacts to the abovementioned environmental parameters.

The proponent currently holds Environmental Protection Licence (EPL) No. 1167. The conditions set out in the EPL should be complied at all times. Related documentation and management plans for the premises should capture the proposed modification as to ensure compliance with the EPL and relevant associated legislation/guidelines.

Further comments and recommendations from the EPA in respect to the modification request from the Tooheys Brewery Site in Lidcombe are outlined in 'Attachment 1'.

Please feel free to contact Ibrahim Muharrem on 9995 5893 with any queries or concerns.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stuart Clark', written over a white background.

Stuart Clark
Acting Unit Head Sydney Industry - Metropolitan Branch
Environment Protection Authority

ATTACHMENT 1

EPA General Comments

Soil and Water Management

It is noted that the current proposal details minimal impacts to water quality due to the nature of the works. The EPA however, recommends that the proponent should thoroughly assess their activities and water quality controls, especially during the construction phase. Any contractors or personnel undertaking works on the premises should be made aware of any risks associated with water quality and implement/maintain effective controls. These controls should be reviewed for performance throughout the duration of the activity. For example, any excess concrete slurry from any potential concreting works undertaken at the premises should be stored/disposed of adequately as to not impact the receiving environment. Any materials present on the premises should be stored/handled appropriately as to not negatively affect stormwater runoff from the premises.

The current proposal outlines that limited earthworks will be required, however, if soil is to be disturbed on the premises, sediment and erosion controls should be implemented at the site as per the guideline *Managing urban stormwater: soils and construction*, Landcom, 2004 which can be viewed online at <http://www.environment.nsw.gov.au/resources/water/BlueBookVol1.pdf>

Air Quality

Air quality management from construction and operational activities, must be taken into specific consideration given the proximity to the large number of sensitive residential and commercial receivers located nearby. Activities need to be monitored closely for excess dust generation (especially earthworks and demolition works) and where necessary effective controls need to be implemented to prevent air quality impacts to nearby sensitive receivers. The implemented air quality controls should be reviewed for performance and take into account changing site activities/methodologies and conditions that may adversely affect air quality at nearby sensitive receivers.

Construction and Operational Noise

In undertaking these operations the proponent should identify and manage any noise sources from the construction and operational phase and undertake all practical measures to mitigate the impacts of noise on any potential sensitive receivers. The proponent needs to comply with the acoustic criteria outlined in the Environmental Protection Licence (EPL) No. 1167 for the premises. It is noted that the premises has approval for 24 hour operations, however, the EPA recommends that any significantly audible construction activities are undertaken within the following recommended standard hours of operation:

- Monday to Friday 7:00am to 6:00pm
- Saturdays 8:00am to 1:00pm
- No work on Sundays or Public Holidays.

Construction noise associated with the project should be managed using the *Interim Construction Noise Guideline*, EPA, 2009 which can be viewed at

<http://www.environment.nsw.gov.au/noise/constructnoise.htm>

Operational noise from all activities to be undertaken on the premises should be managed using the guidelines contained in the *NSW Industrial Noise Policy*, EPA, 2000 which can be viewed at

http://www.epa.nsw.gov.au/resources/noise/ind_noise.pdf

Dangerous Goods/Chemical and Waste Management

The proponent and any contractors that may undertake works at the premises should ensure to minimise environmental risks associated with the storage, procession and handling of hazardous materials and dangerous goods. Any wastes generated by activities at the premises must be classified within the *EPA Waste Classification Guidelines; Part 1: Classifying Waste*, November 2014 found online at <http://www.epa.nsw.gov.au/resources/wasteregulation/140796-classify-waste.pdf>

Community liaison

The proponent should (where necessary) undertake consultation with the nearby community especially if any activity is going to be undertaken that might pose concerns to nearby residential and commercial receivers.

General Comments/Advice

The proponent needs to be aware of the strict liability provisions of the *POEO Act*. All site personnel including contactors undertaking any works on the premises, especially significant construction activities, must be aware of the details of the any works plans, environmental conditions/legislation/guidelines and associated procedures/controls measures before any works commence and during the undertaking of relevant activities.

The proponent should note and be aware of its responsibility to notify each relevant authority of any pollution incident, in accordance with Section 148 of the *Protection of the Environment Operations Act 1997 (POEO Act)*.