



Our reference: DOC12/36864 & 41231  
Contact: Mark Jansons 9995 6829

David Gibson  
Department of Planning and Infrastructure  
GPO Box 39  
Sydney NSW 2001

Dear Mr Gibson,

**Blacktown Mt Druitt Hospital: Stage 1 Expansion**

I refer to your letter to the Environment Protection Authority (EPA) dated 3 September 2012 requesting comments on the Environmental Impact Statement (EIS) and recommended conditions of consent for the above project.

The EPA has reviewed the EIS and considers that the environmental impacts associated with the construction of the hospital can be readily managed by the implementation of appropriate environmental management measures. Notwithstanding this, the EPA has provided comments and recommendations in Attachment A relating to noise and vibration, erosion and sediment and air quality.

Please note that in accordance with the *Protection of the Environment Operations Act 1997*, the EPA is the appropriate regulatory authority (ARA) for activities being undertaken by or on behalf of public authorities, including the hospital upgrade and its operation.

If you have any further questions please contact Mark Jansons on 9995 6829.

Yours sincerely

A handwritten signature in black ink, appearing to read 'F. Garofalo'.

22-10-12

**FRANK GAROFALOW**  
Manager Metropolitan Infrastructure  
Environment Protection Authority

## Attachment A

### EPA comments and recommendations on the EIS for the Blacktown Hospital Expansion

#### 1. Noise and Vibration

The Noise Impact Assessment (NIA) indicates that the background noise or  $L_{Aeq (15 \text{ min})}$  was measured at two locations and differed by 6 dB(A). The report does not provide justification for the locations chosen for background monitoring nor provide any explanation for the difference in background level measured at the two locations. In the absence of any justification, the EPA considers that the lower of the two measurements should be used as the background noise level for the project and to determine noise management levels for the construction of the project and project specific noise levels for operation of the facility.

In addition, the amenity criterion for the night time period has been incorrectly stated as 40 dB(A) Leq. In accordance with Section 2.2 of the *Industrial Noise Policy*, the amenity criterion should be 31 dB(A) Leq.

The NIA is very general in scope, providing only a broad overview of the likely impacts of the project during construction and operation and possible mitigation measures. The NIA indicates that noise impacts from both the construction and operation of the project should be able to be suitably managed to prevent excessive impacts on sensitive receivers but defers detailed assessment and noise planning to engagement of the builder (for construction) and construction certificate stage (for operation) once the mechanical plant is known.

While the EPA acknowledges the constraints of committing to specific reasonable and feasible noise mitigation measures prior to the project design being finalised, at a minimum, the proponent should make a commitment in the EIS to achieving the management levels for the construction of the project and project specific noise levels for operation of the facility.

#### **Recommendation**

With respect to construction noise, the EPA recommends that the conditions of consent specify that:

1. Works must be undertaken in accordance with the *Interim Construction Noise Guideline 2009*.
2. Construction work be confined to standard construction hours
3. Prior to commencement of construction, the proponent prepare a construction noise and vibration management plan with the objective of achieving the noise management levels determined for the project.

With respect to operational noise, the EPA recommends that the conditions of consent specify that:

1. The project specific noise levels are met during operation of the facility
2. Compliance with the project specific noise levels is verified within six month of commencement of operation of the facility.

#### 2. Air Quality

#### **Recommendation**

The EPA recommends that the conditions of any consent include the following:

A suitably detailed and project specific Air Quality Management Plan must be developed which describes proposed specific mitigation measures and safeguards to control dust and exhaust emissions. This plan must be implemented at all stages of the project to minimise impact on nearby sensitive receivers.

#### 3. Erosion and Sediment Control

The EPA notes that this proposal has the potential to cause erosion and sedimentation issues due to the extensive excavation required.

**Recommendation**

The EPA recommends that the conditions of any consent include the following:

A suitably detailed and project specific Erosion and Sediment Control Plan must be developed and implemented as per *Managing Urban Stormwater: Soils and Construction - Volume 1*, Landcom, 4<sup>th</sup> ed. 2004 prior to commencement of any works involving vegetation removal or soil disturbance