



Our Reference: EF17/14331 SF17/60155
Contact: Karen Willows
Date: 13 August 2018

Ms Eleanor Parry
Department of Planning and Environment
P O Box 39
Sydney NSW 2450

Dear Eleanor,

I refer to the NSW Department of Planning and Environment (DoPE) request for Environment Protection Authority (EPA) comments on the project titled '*Coffs Harbour Hospital Expansion SSD 8981*'. As discussed on 1 August 2018 the EPA appreciates being given an extension of time to submit comments on the proposal.

Detailed below are EPA comments that are recommended to be included in the conditions of approval for the proposal:

- The Noise and Vibration report indicates exceedances of up to 26dB during construction. It is recommended that a detailed quantitative noise and vibration assessment be undertaken to develop mitigation measures and management processes for the construction and operational phases of the project. The detailed assessment must be undertaken in accordance with the *NSW EPA Noise Policy for Industry 2017* and be reviewed by the EPA prior to the commencement of construction works.
- The proposed noise and vibration mitigation measures identified from the quantitative noise assessment must be included in the Construction Noise and Vibration Management Plan (NVMP) to be prepared and implemented by the contractor. EPA recommends standard construction hours are adopted for the project.
- In relation to noise emissions during operation of the helipad, the EPA notes that civil aircraft operating in Australia are required to comply with the *Air Navigation (Aircraft Noise) Regulations 2018*.
- It is noted that Environment Protection Licence 11186 is no longer in force at the hospital premises. EPA suggests that the proponent review the waste related scheduled activities under *Protection of the Environment Operations Act 1997* to ascertain legal requirements for waste management during construction and operation of the hospital expansion. For waste compliance advice please contact the EPA's Coffs Harbour Waste Unit on (02) 6659 8282.
- The Preliminary Contamination Report indicates that the Aboveground Storage Tanks (ASTs) holding hydrocarbons are inappropriately stored and may have contaminated the surrounding soil. The Construction Environment Management Plan (CEMP) developed for the proposal should address the potential soil contamination, including any required rehabilitation works and modifications to hydrocarbon storage facilities.

- The Preliminary Contamination Report indicates a holding tank located under the emergency shower is undefined for location, size and discharge point. The EPA suggests options be investigated with a view to decommissioning the holding tank and connect the shower drainage to the sewer system under a trade waste agreement with Coffs Harbour City Council.
- As part of the CEMP a progressive erosion and sediment control plan minimising disturbance to land, minimising water flow through the site and filtering, trapping or detaining sediment is recommended to be prepared and implemented for the project.

Please contact Karen Willows on 02 6640 2509 if you wish to discuss this matter.

Yours sincerely,



Ben Lewin
Acting Manager Regional Operations – North Coast
Environment Protection Authority