



DOC18/496362-01  
SSD 9452

26/7/18

Ms Ellen Mannix  
Department of Planning and Environment  
GPO BOX 39  
SYDNEY NSW 2001

Dear Ms Mannix

**SSD 9452 – AUSTRALIAN MUSEUM RE-DEVELOPMENT (STAGE 1)– SEARs**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to provide input to the Secretary's environmental assessment requirements (SEARs) for the above project.

The EPA understands that the proposed re-development includes significant internal demolition works but little if any excavation other than to facilitate minor landscaping works along the William Street frontage.

The EPA anticipates that, given the age of the structure, asbestos containing materials, lead-based paint and PCBs (associated with electrical equipment and fittings) may be encountered during re-development work.

The EPA notes the site is adjoined by Sydney Grammar School and is close to public recreation areas and thus anticipates significant noise (and potential vibration) impacts during demolition and construction.

The EPA further understands:

- (a) that as the museum is to curate a potentially climate sensitive touring collection and existing climate sensitive collections, mechanical ventilation plant and equipment would operate at all times,
- (b) proposed plant upgrades include mechanical ventilation (i.e. HVAC) the operation of which is likely to have significant noise impacts on surrounding noise sensitive locations, including Sydney Grammar School and nearby residences, and
- (c) a back-up generator may be installed and served by an Underground Petroleum Storage System (UPSS) to ensure climate control parameters are maintained at all times.

The proponent should ensure that the environmental impact statement (EIS) is sufficiently comprehensive and detailed to allow the EPA to determine the extent of the impact(s) of the proposal. The EIS should both:

- (a) describe mitigation and management options that will be used to prevent, control, abate or minimise identified environmental impacts associated with the project and to reduce risks to human health and prevent the degradation of the environment; and
- (b) include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.

The EPA recommends the EIS confirm whether the museum will be served by a back-up generator and of how any associated UPSS would satisfy the requirements of the Protection of the Environment Operations (Underground Petroleum Storage System) Regulation 2014 (including a properly designed and installed secondary leak detection system, loss detection procedures, environment protection plan documentation and incident log). Relevant guidance material is the document Underground Petroleum Storage Systems Best Practice Guide for Environmental Incident Prevention and Management available via the following link:

<https://www.epa.nsw.gov.au/your-environment/contaminated-land/preventing-contaminated-land/upss>

The EPA further notes that the proponent (i.e. Australian Museum Trust) holds Radiation Management Licence (RML) 5079378. The EIS should explicitly address what impact the proposed development may have on existing equipment covered by the proponent's licence as well as any active geological specimens held by the Trust. The EPA recommends that the SEARs include this matter and reference Managing Radiation in NSW available via the following link

<https://www.epa.nsw.gov.au/your-environment/radiation/managing-radiation-nsw>

The EPA has the following specific comments on the draft SEARs:

- Item 10 noise and vibration – the relevant EPA guideline is the Noise Policy for Industry (link below). Of particular relevance is Fact Sheets A and B concerning background noise assessment.

[https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-\(2017\)](https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017)) ;

- Item 17 construction, environment management plan
  - mention is made of waste classification, transportation and management. The SEARs should include reference to the Waste Classification Guidelines Parts 1 (General) available via the link below. It should also cover off-site disposal of concrete waste and rinse water.

<https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/waste-classification-guidelines> ;

- mention is made of water quality management for the site. This should include site establishment, demolition, construction and construction-related erosion and sediment control and management.

Additional aspects which should be addressed in the EIS include:

- (a) the need for a detailed assessment of potential site contamination, including information about groundwater;

- (b) site establishment, demolition, construction and construction-related noise impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) on noise sensitive receivers such as surrounding residences;
- (c) operational noise impacts on noise sensitive receivers (especially Sydney Grammar School and surrounding residences) arising from operational activities such as waste collection services and mechanical services (especially air conditioning plant and equipment);
- (d) operational waste management in accordance with the waste management hierarchy;
- (e) practical opportunities to implement water sensitive urban design principles, including stormwater re-use for grounds maintenance and toilet flushing; and
- (f) practical opportunities to minimise consumption of energy generated from non-renewable sources and to implement effective energy efficiency measures, including passive solar design.

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

Yours sincerely



**SARAH THOMSON**  
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**Environment Protection Authority**