Submission No 43

INQUIRY INTO ENROLMENT CAPACITY IN INNER CITY PUBLIC PRIMARY SCHOOLS

Name: Mr Damien Hawcroft

Date received: 16 September 2016

Subject: School Contamination letter from Anthony Perrau (Executive Director, Asset Management) dated 3 August 2015.

NSW Department of Education supplied on their web site, two Remediation of the Wattle St Site Reports done by external experts in this field. In summary these 2 reports state:

Report 1 (Douglas Partners dated April 2015) states that there are “significant unknowns” and “It is considered that the site can be rendered suitable for the proposed development subject to appropriate further investigation”.

Also, “DP's reports are based on information gained from limited subsurface excavations and sampling”.

Report 2 states “Advice is given….subsequent to verification once access to the site is provided and a more robust geotechnical and contaminant survey performed.”

To my knowledge based on information provided to date “appropriate further investigation” and “more robust geotechnical and contaminant survey performed” have not been done.

Anthony Perrau’s School Contamination letter states “expert review of the soil and groundwater contamination has confirmed that the site is significantly contaminated. As the publicly available expert report indicates, it is highly unlikely that further site testing would see a reduction in the predicted level and extent of the contamination on the site” So,

How can this **School Contamination letter** stated the above when recommendations from the two independent expert reports have not been implemented?

Extracts from these 2 key reports, follow.

REPORT 1

Douglas Partners Report – Remediation Action Plan – Proposed Primary School 14 – 16 Wattle St Ultimo - Project No. 73753.02 of April 2015

Executive Summary extract:

“Based on a review of various remediation technologies, the following preferred remediation strategies
were identified:

- Option 1: Source removal (with off-site disposal and/ or on-site bioremediation), partial physical
encapsulation of soil and monitored natural attenuation (with possible phytoremediation);
- Option 2: Removal of soil to a nominated depth below proposed ground level (with off-site

disposal and/ or on-site bioremediation), partial physical encapsulation and monitored natural
attenuation (with possible phytoremediation);
 Option 3: Physical encapsulation of soil, including capping, impermeable barrier wall and vapour
management; and

- Option 4: Removal and off-site disposal of all contaminated soil and groundwater.

It is considered that the site can be rendered suitable for the proposed development **subject to appropriate further investigation** and remediation in accordance with this ORAP. A Remediation Action Plan will be required to provide the detailed methodology for the adopted remediation strategy.

7.1 Preferred Remediation Strategies and Rationale extract:

"The following preferred potential general remediation strategies have been identified, and are
considered in more detail below:

• Option 1: Source removal (with off-site disposal and/ or on-site bioremediation), partial physical
encapsulation of soil and monitored natural attenuation (with possible phytoremediation);

• Option 2: Removal of soil to a nominated depth below proposed ground level (with off-site
disposal and/ or on-site bioremediation), partial physical encapsulation and monitored natural
attenuation (with possible phytoremediation);

• Option 3: Physical encapsulation of soil, including capping, impermeable barrier wall and vapour
management; and

• Option 4: Removal and off-site disposal of all contaminated soil and groundwater."

Of the above 4 Options it was stated by the consultant that **Significant Unknowns** are:

Option 1 – "The following should be considered in assessing the applicability and budget risks for this option:

- Groundwater quality at and down-gradient of the site has not been sufficiently characterised to
confirm the suitability of MNA as a suitable strategy;
- Vapour assessment to date is not sufficient to allow confirmation of the need or otherwise for a
vapour management system. It is reasonable to assume that a vapour management system will be
installed in the absence of sufficient data to show otherwise;
- The depth, quantity and classification of soil requiring targeted removal has not been defined/ well

defined; and

- A treatment methodology for hazardous waste has not been determined."

Option 2 – "The following should be considered in assessing the applicability and budget risks for this option:

- Groundwater quality at and down-gradient of the site has not been sufficiently characterised to confirm the suitability of MNA as a suitable strategy;
- Vapour assessment to date is not sufficient to allow confirmation of the need or otherwise for a vapour management system. It is reasonable to assume that a vapour management system will be installed in the absence of sufficient data to show otherwise;
- The depth and quantity and classification of soil requiring targeted removal beyond the nominal depth of excavation has not been defined/ well defined; and
- A treatment methodology for hazardous waste has not been determined.

"

Option 3 – "The following should be considered in assessing the applicability and budget risks for this option:

- Detailed design of the impermeable barrier wall has not been determined;
- Vapour assessment is not sufficient to allow confirmation of the need or otherwise for a vapour management system. It is reasonable to assume that a vapour management system will be installed in the absence of sufficient data to show otherwise; and
- A treatment methodology for hazardous waste has not been determined.

"

Option 4 – "The following should be considered in assessing budget risks for this option:

- The depth and quantity of filling and quantity of hazardous waste have not been defined/ well defined;
- A treatment methodology for hazardous waste has not been determined; and
- The groundwater quality at and down-gradient of the site has not been characterised."

11 Conclusions

"It is considered that the site can be rendered suitable for the proposed development subject to appropriate further investigation and remediation in accordance with this ORAP. A Remediation Action Plan will be required to provide the detailed methodology for the adopted remediation strategy"

Appendix A – About this Report" - "DP's reports are based on information gained from limited subsurface excavations and sampling, supplemented by knowledge of local geology and experience. For this reason, they must be regarded as interpretive rather than factual documents, limited to some extent by the scope of information on which they rely."

REPORT 2

McLachlan Lister Hill International - Letter / Report from
to Mr Tony McCabe Director Capital Works – Remediation Action Plan – Development Status Report of 24 June 2015

Extracts state: "preferred remediation solution involves the removal of approximately 3m depth of existing fill material ……replacing with clean fill as a cap……."

Advice is given….subsequent to verification once access to the site is provided and a more robust geotechnical and contaminant survey performed. We consider this will refine the remediation solution and provide current data to support approval of the solution by EPA we do not consider the options to radically change."