

20th April 2012

Our Ref:

Email: rosalie.mayo-ramsay@workcover.nsw.gov.au

Your Ref: MP 10_0028

Ms Christine Chapman
Senior Environmental Planner
Major Development Assessment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Chapman

WorkCover response to Redmond's Integrated Recycling Park, Grand Avenue Camellia

WorkCover has reviewed the Environmental Assessment (EA) dated February 2012 prepared by National Environmental Consulting Services. Below are outlined some concerns with this development.

1. WorkCover has not been previously consulted about the potential exposure to asbestos and other hazardous substances that could be released from this site during the construction and use stages of this development. Therefore this response has been hastily put together and there may be issues relating to this site that we have not been able to address.
2. The James Hardie site has a history of asbestos contamination as it was the site of major asbestos manufacture and although the buildings have been demolished and the area covered in concrete and asphalt, the asbestos fill material remains underneath the capping.
3. No where in the EA is there any details about how they intend to mitigate asbestos fibres during the construction phase of the redevelopment. This is of considerable concern to WorkCover as recent work involving excavation into old garbage tips have yielded high fibre in air readings.
4. There is no methodology of how the fill will be compacted over the hard stand without penetrating the capped layer or how the weight of the buildings and associated structures may effect the capping layer.
5. The extent of excavation works to be carried out are along the side of the site that holds the most contamination and the amount of earth to be removed from this area would constitute a major friable asbestos removal programme carried out by a licensed friable asbestos removal contractor and not just supervised by one.

Before any approval could be made for this type of development to take place on this contaminated land we would like to have the opportunity to be fully informed and consulted on the following matters.

- The manner of construction of the service trenches so that no asbestos fibres are released into the atmosphere that could cause adverse health effects to the workers and the general public. This may require complete enclosure of the work areas.

- The methodology for ensuring the integrity of the capping layer during construction and use of the site, as well as the ongoing assessment of the capping layer to ensure no breaches occur in the future.
- Comprehensive air monitoring programme not just of the site but of the neighbouring area to ensure no asbestos fibres migrate beyond the development site.

In developing the above procedures consideration has to be given to the proximity of other workplaces, the child care centre, the railway station and other public area.

Any work carried out on this site has to be in accordance with the *Work Health and Safety Act and Regulation 2011* and the code of practice *How to Safely Remove Asbestos 2011*.

If you have any questions in relation to this matter, please contact Rosalie Mayo-Ramsay on (02) 4321 5209

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rosalie Mayo-Ramsay', with a stylized flourish at the end.

Rosalie Mayo-Ramsay
State Coordinator Asbestos and Demolition
WorkCover NSW