

4 September, 2015
Our Ref: WC01440/15
Your Ref: SSD 6533

Ms Michelle Nettleford
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Email: michelle.nettleford@planning.nsw.gov.au

Dear Ms Nettleford

Thank you for your correspondence seeking comments on the proposed remediation of the Environmental Protection Authority Declaration Area (No. 21122) and adjacent areas at Barangaroo.

Based on the information available in the Environmental Impact Statement (EIS) SSD14_6533, dated August 2014, SafeWork NSW, (formerly WorkCover) requests the inclusion of a detailed work health safety management plan for the site remediation works for this development application. This is to ensure health risks from the contaminant chemicals for workers involved in the remediation work are adequately addressed alongside the proposed public health and environmental mitigation measures.

The proposed remediation works include soil contaminated with a number of hazardous chemicals, including polycyclic aromatic hydrocarbons, total petroleum hydrocarbons, toluene, ethylbenzene, xylenes and cyanide, as well as a number of metals including arsenic, lead and mercury. Most of these substances contain human carcinogens and are reported to be chemical waste and waste tar which are a legacy of the gas works that operated at the site until the 1920s.

Environmental consultants have undertaken investigations that have shown concentrations of some of the above chemicals exceed soil health criteria levels, which as the Department is aware, are indicators for soil remediation. Workers involved in the remediation work may therefore be at risk of exposure to some of these soil contaminants as the works include excavation of contaminated soil, transport of hazardous soils for treatment off-site and off-site disposal of excavated material. Groundwater in the area also includes these contaminants but the risk is limited to aquatic ecosystems.

The Health Impact Assessment section in the EIS (page 51) reports that measures will be taken to control emission of particulates and gases to prevent inhalation and dermal exposures that may be of high risk to workers at the site. This is based on a health risk assessment, details of which were not available for review.

With regard to specific measures to controlling worker exposures, however, the report only states *In addition to source controls, risks to on-site workers will be minimised by engineering controls, safe work practices and effective hygiene procedures (such as hand washing) and use of appropriate personal protective equipment.* This is under *Mitigation Measures* on page 94 of the EIS.

WorkSafe NSW requests that further details on the risk management approach be included in the application. In addition to risk management, health monitoring of workers should be considered if there is any significant risk of exposure to soil contaminants from the works to be undertaken and details of this approach should also be included.

If the applicant has already addressed the risks of the proposed remediation work within its overall work health safety management plan for the whole Barangaroo development, the details of this should be provided in the application.

In addition to the gasworks waste chemicals, the EIS has identified asbestos contaminated materials. The EIS appears to address the risks associated with the asbestos hazard and it is noted that the applicant has dealt with this issue previously in the whole Barangaroo development. However, details of the risk management approaches related to asbestos hazard should also be included in this application.

I trust this information is of assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Dunphy', with a stylized flourish at the end.

Peter Dunphy PSM
Executive Director
SafeWork NSW