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6th December 2024

Marko Neskoski

Besix Watpac

16 Kensington Street Kogarah NSW 2217

Dear Marko,

St George Hospital - Refurbishment REF: Hazardous Materials

1 Introduction

This Letter of Advice has been prepared by Prensa Pty Ltd on behalf of the Health Infrastructure NSW (the **Applicant**) to assess the potential environmental impacts that could arise from the refurbishment works at St George Hospital at 16 Kensington Street, Kogarah (the **site**).

This report has been prepared to provide information on further hazardous materials assessments required to be undertaken in order to satisfy the requirements for sections 6.2.14 Hazardous Materials and Contamination of the Review of Environmental Factors.

This report accompanies a Review of Environment Factors that seeks approval for the refurbishment of the existing St George Hospital, which involves the following works:

- Internal refurbishment works within existing hospital buildings.
 - Burt Nielson Wing Level 1 Fluoroscopy
 - o Burt Nielson Wing Level 2 Paediatrics and CYF
 - Clinical Services Building & Services Block Ground Floor Back of House
 - Ward Block Level 2 Multi-faith, Patient Transit and AAU
 - o Tower Ward Block Level 4 Renal
 - Tower Ward Block Level 6 Surgical
 - Prichard Wing Various Levels Sexual Health, Antenatal and Gynaecology
 - Acute Services Building Level 7 Palliative Care
- Minor extension for a new Clinical Waste building within the hospital campus and new covered walkways
- Services upgrade/ modification works & new services installations including but not limited to lighting, hydraulics, mechanical, fire and stormwater and drainage
- Demolition of existing buildings within the hospital campus and wider precinct



 Civil & Landscaping works adjacent to Belgrave Street for continuation of the Ambulatory Care main entry forecourt area

For a detailed project description, refer to the Review of Environmental Factors prepared by Ethos Urban.

1.1 Site Description

The St George Hospital is located on Kensington Street, Kogarah, within the Georges River Council Local Government Area (LGA) on Bidjigal Country. The hospital site is approximately 12 kilometres south of the Sydney CBD and has an area of approximately 5.16 hectares.

The hospital is located in a cluster of health and education uses within the Kogarah town centre. It comprises a number of buildings associated with the hospital campus situated around an internal road network.

St George Hospital is within proximity of transport services and key road links, including Kogarah Railway Station approximately 350 metres to the north of the site and Princes Highway to the east of the site. An aerial image of the site is shown at **Figure 1**.



Figure 1 Site Aerial

Source: Nearmap, edits by Ethos Urban

1.2 Statement of Significance

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed development, it is determined that:

• The extent and nature of potential impacts of the proposed works are moderate, and have the potential to result in significant adverse effects on the locality, community and the environment,



however, enacting the recommendations raised in **Section 5** should suitably manage the impacts of development in regards to hazardous materials so that they are no longer significant.

1.3 REF Reporting Requirements

The REF Reporting Requirements have been outlined below in Table 1

Table 1: REF Reporting Requirement			
REF Reporting Requirement	Location in Report		
6.2.13 Hazardous Materials and Contamination	 133748S St George Hospital REF – Hazardous Materials; Hazardous Materials management Plans provided by Prensa for each building. 		

2 Scope of Works

The scope of works to assist Watpac in fulfilling the requirements for the Hazardous materials component of the REF include:

- Review the previous hazardous materials assessment reports for the locations within the scope of the REF; and
- Provide this letter summarising the existing data gaps and providing recommendations relating to additional investigations and/ or management of Hazardous materials at the Site.

3 Methodology

As part of this Assessment, Prensa reviewed the following documents:

- Prensa Hazardous Materials Assessment reports and Hazardous Materials Management Plans (HMMP):
 - 128749S-001 Renal Care Centre Dest Hazmat Report/ HMMP;
 - 128749S-002 Banksia Building Dest Haz Phase 1 Report/ HMMP;
 - 128749S-003 Rose Cottage Dest Hazmat Report/ HMMP;
 - 128749S-004 Aged Care Hazmat Hazmat Report/ HMMP;
 - 128749S-005 Residential Accom Hazmat Report/ HMMP;
 - 128749S-006 Eye Clinic Report/ HMMP;
 - 128749S-007 Older Adult Health Report/ HMMP;
 - 125206S-001 St George Hospital Refurb Phase 1 Hazmat Report/ HMMP;
 - 125206S-002 St George Hospital Pelvic Floor Unit Phase 1 Hazmat Report/ HMMP;
 - 125206S-003 St George Hospital Sleep Disorders Lab Phase 1 Report/ HMMP; and
 - o 125206S-004 St George Hospital Prince William Wing Phase 1 Report/ HMMP.

4 Findings

Given the constraints of practicable access to areas within the Scope of this LOA, certain areas/ items were not inspected during Prensa's initial Site Assessments. Assessments are restricted to those areas that are reasonably accessible at the time of the assessment with respect to the following:

- Without contravention of relevant statutory requirements or codes of practice.
- Without significantly disturbing the occupants in the areas.
- Without placing the Prensa consultant and/or others at undue risk.



- Without demolition or damage to finishes and structure.
- Excluding plant and equipment that was 'in service' and operational.

Table 2: Hazardous materials – Remaining actions below outlines the actions to be completed prior to redevelopment works being undertaken in nominated areas at the Site.



Table 2: Hazardous materials – Remaining actions				
Building	Location	Reason not Assessed during the initial Assessment	Actions	
Throughout all locations	 Roof areas Beneath concrete slabs Exposed soils surrounding building structures Energised services, gas, electrical, pressurised vessel and chemical lines Height restricted areas above 2.7m or any area deemed inaccessible without the use of specialised access equipment. Within cavities that cannot be accessed by the means of a manhole or inspection hatch. Within voids or internal areas of plant, equipment, air-conditioning ducts etc. Within service shafts, ducts etc., concealed within the building structure. Within those areas accessible only by dismantling equipment. Within totally inaccessible areas such as voids and cavities present but intimately concealed within the building structure. All areas outside the Scopes of Work for the initial assessments. 	As outlined in Section 4 above	Further investigation may be required as part of the hazardous building materials management and abatement program prior to the commencement of works	
Building 14 – Renal Care Centre	Throughout, building subfloor	Impeded door to subfloor	Further investigation may be required prior to the commencement of works	
•	Throughout, beneath certain carpets	Limited destructive access	Further investigation may be required prior to the commencement of works	



	West elevation – Fire doors x 2	No destructive access	Destructive investigation is required to confirm status
Building 17 – Banksia Building	Gardeners shed adjacent the north end of the building	Locked door	Further investigation may be required prior to the commencement of works
	North elevation demountable adjoining the Banksia Building	Locked door	Further investigation may be required prior to the commencement of works
	External, east side of the building	Obstruction by adjacent St George Private Hospital building	Further investigation may be required prior to the commencement of works
	Ceiling space	Access hatch opens directly to metal roof	Further investigation may be required prior to the commencement of works
	Throughout roof areas – Air conditioning units	No data was visible at the time of the Assessment	Further investigation is required to confirm status
	West elevation – Fire doors	No destructive access	Destructive investigation is required to confirm status
Rose Cottage	Building subfloor	No safe access	Further investigation may be required prior to the commencement of works
	Kitchen wall behind the benchtop	No destructive access	Further investigation may be required prior to the commencement of works
	North elevation – Fire door	No destructive access	Destructive investigation is required to confirm status
	Front of building – Gables	Height restrictions	Further investigation is required to confirm status
Building 36 – Residential Accommodation	External, footprint of building – fibre cement sheet debris	Restricted access	Detailed further investigation required prior to the commencement of works to determine extent of debris to ground
Building 28 – Eye Clinic	External, north elevation, to ground – air conditioning unit	Access restrictions	Further investigation is required to confirm status
Building 40 – Older Adult Health Building	External, within the electrical distribution board enclosure	Locked unit	Further investigation may be required prior to the commencement of works



	External, footprint of building – fibre cement sheet debris	Restricted access	Detailed further investigation required prior to the commencement of works to determine extent of debris to ground
Pelvic Floor Unit	External, north east elevation side of the Site	Locked gate	Further investigation may be required prior to the commencement of works
	Throughout, Within ceiling spaces	Sealed access hatches	Further investigation may be required prior to the commencement of works
	Throughout – Fire doors x 4	No destructive access	Destructive investigation is required to confirm status
	Throughout – air conditioning units	No data was visible at the time of the Assessment	Further investigation is required to confirm status
Sleep disorders Lab	External, north west corner of the building adjacent entry	Locked gate	Further investigation may be required prior to the commencement of works
	Throughout, behind all ceramic tiles in various locations	No destructive access	Further investigation may be required prior to the commencement of works
	Throughout – Air conditioning units	No data was visible at the time of the Assessment	Further investigation is required to confirm status

125206S-001 St George Hospital Refurb Phase 1 Hazmat Report/ HMMP; Although part of Prensa's initial Phase 1 Assessment, this report was not referenced as part of our recommendations for further actions as Prensa understands all areas referenced within this report are to undergo refurbishments only and will not be subject to demolition.

5 Recommendations

Based on the findings of this Assessment, it is recommended that the following control measures be adopted as part of the management of the hazardous building materials at the Site:

- All locations/items listed above must be assumed to contain hazardous materials until proven otherwise;
- Further investigation with destructive access is recommended to assess the inaccessible areas/items listed above;
- Asbestos risk should be managed in accordance with the existing HMMPs provided by Prensa for each building, an alternative option is to create an overarching HMMP that captures all risks for the whole site; and
- During demolition/refurbishment works, if any materials that are not referenced in the Hazardous materials register for that area and are assumed to be hazardous are encountered, then works must cease and a hygienist should be notified to determine the status of that material.



The undertaking of the recommendations above will suitably manage the impacts of development in regards to hazardous materials so that they are no longer significant.

6 Limitations

The following limitations should be considered when interpreting the findings of this Letter of Advice

- No additional Site attendances were undertaken by Prensa for the preparation of this letter of advice;
- Areas understood to form part of the REF package of works were nominated by Watpac and shown graphically in Attachment B: Site Plan, and are believed to be accurate to the scope of works to be undertaken.

Should you have any questions regarding this report, please do not hesitate to contact the undersigned on (02) 8968 2500.

Yours sincerely,

Sam du Feu

Associate HSE Consultant

Prensa Pty Ltd

Attachments

A - Statement of Limitations



Attachment A: Statement of Limitations





Statement of Limitations

This document has been prepared in response to specific instructions from Besix Watpac to whom the report has been addressed. The work has been undertaken with the usual care and thoroughness of the consulting profession. The work is based on generally accepted standards, practices of the time the work was undertaken. No other warranty, expressed or implied, is made as to the professional advice included in this report.

The report has been prepared for the use by Besix Watpac and the use of this report by other parties may lead to misinterpretation of the issues contained in this report. To avoid misuse of this report, Prensa advise that the report should only be relied upon by Besix Watpac and those parties expressly referred to in the introduction of the report. The report should not be separated or reproduced in part and Prensa should be retained to assist other professionals who may be affected by the issues addressed in this report to ensure the report is not misused in any way.

Prensa is not a professional quantity surveyor (QS) organisation. Any areas, volumes, tonnages or any other quantities noted in this report are indicative estimates only. The services of a professional QS organisation should be engaged if quantities are to be relied upon.

Sampling Risks

Prensa acknowledges that any scientifically designed sampling program cannot guarantee all sub-surface contamination will be detected. Sampling programs are designed based on known or suspected site conditions and the extent and nature of the sampling and analytical programs will be designed to achieve a level of confidence in the detection of known or suspected subsurface contamination. The sampling and analytical programs adopted will be those that maximises the probability of identifying contaminants. Besix Watpac must therefore accept a level of risk associated with the possible failure to detect certain sub-surface contamination where the sampling and analytical program misses such contamination. Prensa will detail the nature and extent of the sampling and analytical program used in the investigation in the investigation report provided.

Environmental site assessments identify actual subsurface conditions only at those points where samples are taken and when they are taken. Soil contamination can be expected to be non-homogeneous across the stratified soils where present on site, and the concentrations of contaminants may vary significantly within areas where contamination has occurred. In addition, the migration of contaminants through groundwater and soils may follow preferential pathways, such as areas of higher permeability, which may not be intersected by sampling events. Subsurface conditions including contaminant concentrations can also change over time. For this reason, the results should be regarded as representative only.

Besix Watpac recognises that sampling of subsurface conditions may result in some cross contamination. All care will be taken and the industry standards used to minimise the risk of such cross contamination occurring, however, Besix Watpac recognises this risk and waives any claims against Prensa and agrees to defend, indemnify and hold Prensa harmless from any claims or liability for injury or loss which may arise as a result of alleged cross contamination caused by sampling.

Reliance on Information Provided by Others

Prensa notes that where information has been provided by other parties in order for the works to be undertaken, Prensa cannot guarantee the accuracy or completeness of this information. Besix Watpac therefore waives any claim against the company and agrees to indemnify Prensa for any loss, claim or liability arising from inaccuracies or omissions in information provided to Prensa by third parties. No indications were found during our investigations that information contained in this report, as provided to Prensa, is false.

Recommendations for Further Study

The industry recognised methods used in undertaking the works may dictate a staged approach to specific investigations. The findings therefore of this report may represent preliminary findings in accordance with these industry recognised methodologies. In accordance with these methodologies, recommendations contained in this report may include a need for further investigation or analytical analysis. The decision to accept these recommendations and incur additional costs in doing so will be at the sole discretion of Besix Watpac and Prensa recognises that Besix Watpac will consider their specific needs and the business risks involved. Prensa does not accept any liability for losses incurred as a result of Besix Watpac not accepting the recommendations made within this report.



Attachment B: Site Plan

St George Hospital Campus Map

