

20 November 2024

Sonia Mallos
Project Lead, Major Projects
School Infrastructure NSW
Level 8, 259 George Street
Sydney NSW 2000

Via email: Sonia.DaSilva1@det.nsw.edu.au
cc: maria.soerensen@tsariley.au

Dear Sonia,

Re: Interim Advice 2 (IA2) Endorsement of the Remedial Action Plan for the New High School for Schofields and Tallawong

1 Introduction

The Department of Education (DoE) Schools Infrastructure NSW (SINSW) has appointed Rebeka Hall of Geosyntec Consultants Pty Ltd (Geosyntec), a NSW EPA Auditor accredited under the Contaminated Land Management (CLM) Act 1997, to conduct an Audit at 201 Guntawong Road, Tallawong NSW 2762 ("the site"). The land is identified as Lot 1 in DP1283186 and occupies an area of approximately 4ha.

This Interim Audit Advice (IA) has been prepared to support a Review of Environmental Factors (REF) for the Department of Education (DoE) for the construction and operation of the new Schofields - Tallawong High School (the activity).

The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) as "development permitted without consent" on land carried out by or on behalf of a public authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

This document has been prepared in accordance with the NSW EPA (2017) Contaminated Land Management Guidelines for the NSW Site Auditor Scheme (3rd edition). The purpose of this IA is to endorse the remedial action plan for the site. The overall aim of Audit is to enable a site audit statement (SAS) and associated site audit report (SAR) to be prepared that confirms the suitability of the site for the proposed secondary school at the completion of any remediation required.

2 Proposed Activity and Development

The proposed activity is for the construction and operation of a new high school known as Schofields - Tallawong High School. The new high school will accommodate up to 1,000 students. The school will provide 49 permanent teaching spaces (PTS), and 3 support teaching spaces (STS) across three buildings.

The buildings will be three-storey in height and will include teaching spaces, specialist learning hubs, a library, administrative areas and a staff hub. Additional core facilities are also proposed including a standalone school hall, a carpark, a pick up and drop off zone along Nirmal Street, two sports courts and a sports field.

Specifically, the proposal involves the following:

- Three learning hubs (three-storeys in height) accommodating 49 general teaching spaces and 3 support learning units (SLUs).
- Other core facilities including amenities, library, staff hub and administrative areas.
- Standalone school hall.
- Separate carpark with 72 spaces.
- Kiss and drop zone along Nirmal Street.
- Open play space including sports courts and sports field.
- Public domain works.
- The proposed site access arrangements are as follows:
 - Main pedestrian entrance to be located off Nirmal Street.
 - Kiss and drop zone proposed along Nirmal Street.
 - Onsite parking access via Nirmal Street.

3 Scope of Audit and Nature of Interim Advice

NSW EPA (2017) describes the site assessment and audit process as:

1. *Consultant is commissioned to assess contamination.* The contaminated site consultant designs and undertakes the site assessment and, where required, all remediation and validation activities to achieve the objectives specified by the owner or developer; and
2. *Site auditor reviews the consultant's work.* The site owner or developer commissions the Auditor to review the consultant's work. The Auditor then prepares a SAR and SAS at the conclusion of the review, which are given to the owner or developer.

Therefore, the contaminated land consultant and other relevant parties should be satisfied that the work to be conducted conforms to all appropriate regulations, standards and guidelines and is suitable based on the site history and the proposed land use.

The Audit is currently non statutory. Once project approvals are obtained, the Audit may become statutory and will require notification to NSW EPA.

4 Current Interim Advice

In preparing this interim audit advice (IA), the Auditor has reviewed the following reports related to land contamination assessment and proposed remediation:

- JBS&G (14 November 2024) Detailed Site Investigation (DSI) Report, Proposed Tallawong High School (Ref: 67774-162496 (Rev B)); and
- JBS&G (14 November 2024) Remedial Action Plan (RAP), Proposed Tallawong High School (Ref: Ref: 67774-162922 (Rev B)).

The Auditor had reviewed earlier versions of the DSI and RAP, and provided comments in Interim Advice No.1 (30 October 2024). The updated documents presented above have satisfactorily addressed Auditor comments. The purpose of the current IA is to endorse the remedial strategy presented in JBS&G (14 November 2024) RAP.

5 Summary of Remediation Strategy (JBS&G, November 2024)

The objectives of the remediation works are to:

- Remove or manage potentially unacceptable human health and aesthetic issues for the proposed redevelopment.
- Ensure any unexpected contamination finds are assessed, managed and validated appropriately for the proposed land use.
- Validate the remedial works in accordance with relevant NSW EPA guidelines and with reference to the site-specific validation assessment criteria.
- Document the remediation and validation process.

Based on the findings of previous environmental investigations, the extent of remediation works comprises the removal and/or management of waste material and asbestos impacted fill as well as aesthetic issues associated with in-situ and stockpiled fill identified during the investigations.

The proposed remediation comprises:

- A site-wide pre-remediation inspection. Following vegetation slashing, an inspection of the ground surface to be conducted to identify any unexpected finds including aesthetic impact or surface debris.
- Completion of a data gap investigation to assess:
 - Quality of dam sediments and embankments
 - Areas of surface debris following pre-remediation inspection
- Excavation of waste material and asbestos impacted soils in the vicinity of TP183B and disposed offsite to a suitably licensed facility.
- Hand picking of bonded ACM within surface soils.
- Excavation of impacted subsurface soils and placement onto a pad for emu picking for bonded ACM.
- Management of aesthetically unsuitable materials within stockpiles via sieving and offsite removal.
- The estimated extent of remediation is 725m³ of asbestos impacted fill (associated with a former site structures and a waste burial pit) as well as stockpiled material (estimated at 1,000m³) that may pose aesthetics issues for reuse at the site.
- Offsite disposal of any surplus material.
- Asbestos management via the implementation of an asbestos management plan during the works.
- Verification of imported material as suitable for use on the site.

The above will be subject to validation to demonstrate the remedial objectives have been achieved and to document the final condition of the site at the completion of remediation.

The JBS&G (14 November 2024) RAP provides contingencies in the event contamination volumes are greater than expected, including requirements should a containment cell for onsite containment of contamination be implemented. Should onsite cap and containment of contamination be implemented the site will require a long term Environmental Management Plan (EMP).

JBS&G concluded that subject to the implementation of the above remedial measures the site can be made suitable for the proposed high school.

6 Mitigation measures

The mitigation measures associated with the interim advice are presented in Table 1.

Table 1. Mitigation Measures

Mitigation Number/Name	Aspect/Section	Mitigation Measure	Reason for Mitigation Measure
Endorsement of the Remedial Action Plan	As part of initial civil works	Independent review to confirm remedial approach conforms to all appropriate regulations, standards and guidelines and is suitable based on the site history and the proposed land use	The IA ensures the site is capable of being made suitable for the proposed high school use, subject to the implementation of the RAP and associated validation works

7 Evaluation of Environmental Impacts

Based on the interim advice, the following evaluation of environmental impacts, relating to the remediation approach have been made:

- The extent and nature of contamination outlined in the JBS&G (2024) RAP is low, and the remediation and validation works presented in the RAP will not have significant impact on the locality, community and/or the environment.
- Subject to implementation of the JBS&G (2024) RAP and compliance with Auditor conditions presented below, potential impacts can be appropriately mitigated or managed to ensure that there is minimal impact on the locality, community and/or the environment.
- Adequately mitigated through recommended measures.
- Is not considered to be a significant impact.

8 Auditor Conclusions

The Auditor considers the JBS&G RAP (14 November 2024) has been prepared in general accordance with relevant NSW EPA made or endorsed guidelines and is appropriate for the contamination known at the site.

Given the available information, **the Auditor concludes that the site is capable of being made suitable for the proposed use, provided that the JBS&G RAP (November 2024) is implemented and subject to the following conditions:**

1. For stockpiles considered aesthetically unsuitable, the Auditor supports screening to remove debris and inclusions, or the placement of aesthetically impacted material under hardstand (if geotechnically suitable).
2. Should capping and containment be required as part of the remediation works, the location and design specifics (including final cover) for the cell must be submitted to the Auditor for review and endorsement prior to implementation.
3. The Material Tracking and Management plan for movement of material to, from and within the site, must reviewed and endorsed by the Site Auditor.
4. At the completion of remediation activities a validation report, prepared in accordance with NSW EPA reporting guidelines, must be provided to the Site Auditor for review and endorsement, to enable the issue of a Section A Site Audit Statement confirming the site is suitable for high school land use.

9 Closure

This interim advice does not constitute a SAS or a SAR, but rather is provided to assist the Client in the assessment and management of contamination issues at the site. The information provided herein should not be considered pre-emptive of the final Audit conclusions. It represents the Auditor's opinion based on the review of currently available information.

Should you have any queries or wish to discuss any points, please do not hesitate to contact Matthew Rendell or the undersigned.

Yours sincerely,



Rebeka Hall
Site Auditor (NSW EPA 0802)
Geosyntec Consultants Pty Ltd