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The Hon Bob Debus  
Minister for the Department of Environment and Conservation  
Environment Protection Authority

### **Concerns and Questions – Levels of asbestos remaining on Former ADI Site St Marys**

#### **Background**

The ADI Residents Action Group was formed in 1993. One of the ongoing concerns of ADI RAG has been the suitability of the ADI Site for human habitation/urban development due to its industrial and munitions manufacturing history.

ADI RAG has for many years witnessed former employees of the St Marys Munitions Filling Factory tell of work practices that involved the dumping of hazardous and toxic materials/substances beneath the sub soil of the property and into drains and water courses. These work practices resulted in the contamination of the property.

Due to the contaminated state of the ADI Site and the need to make the land suitable for urban development a remediation process commenced in the 1990's. The culmination of this remediation process was the 1999 NSW Department of Urban Affairs commissioned Report: Site 2 Decontamination Audit of ADI St Marys Final Audit Report by NSW Site Auditor, Christopher Kidd. Essentially this report declares most of the ADI site suitable for urban development, that the cleanup methodology and identification of contamination was proper, thorough and in accord with appropriate legislation.

#### **Current Concerns**

ADI RAG questions the thoroughness of the Site 2 Decontamination Audit of ADI St Marys Final Audit Report in accounting for total volumes of asbestos used on the ADI Site since the construction of the St Marys Munitions Filling Factory in the early 1940's.

Recently, 2004 and 2005, exposed asbestos has been found on the ADI Site. Members of the public are still contacting us with anecdotal evidence of witnessing the burying of asbestos during their employment at the SMFF. Their concerns are that these burial sites were unrecorded and therefore, may still exist, despite a so-called extensive and proper remediation process.

The Site 2 Decontamination Audit of ADI St Marys Final Audit Report concentrates extensively on the identification of unexploded ordnance and it appears that the technology used to search the site (sub surface imaging technology) was specific to the detection of metallic objects only. Therefore there is huge doubt over the effectiveness of the site remediation methodology and technology used to detect buried asbestos in any unrecorded sites. It would appear that the methodology used for the detection of asbestos was to refer to information held by ADI Ltd of recorded tip sites or seek anecdotal evidence of some of the former employees of the SMFF. This methodology appears

problematic and in no way could be relied upon to account for all instances of buried asbestos since 1942. Which accounts for asbestos being found in 2004 and 2005.

ADI RAG seeks answers to the following questions relating to asbestos and the Site 2 Decontamination Audit of ADI St Marys Final Audit Report:

- What was the total amount of asbestos that entered the ADI Site since 1942? What was the total amount of asbestos removed from the site?
- What was asbestos used for and where on the site was it used? (The extent of its use)
- Could the sub surface imaging technology, relied upon to find buried contamination, identify asbestos? If so to what depths? If not is it possible large amounts of asbestos remain buried on the site?
- The Audit Report claimed 830m<sup>3</sup> of asbestos sheeting and insulation come out of sector – north east – 7.11.2. No mention is made of the disposal company used to eliminate it and no indication is given to its final disposal destination, unlike as stated for sector – central east. Why is this so? What documentation exists to validate its disposal and was this witnessed by the Site Auditor?
- Sector – north east – had extensive steam powered operational capacity and is assumed to contain its own boiler house. Why is there no mention of asbestos either above ground in demolished structures and underground facilities as for the adjacent sector – central east?
- Why does the Audit not follow a consistent methodology in accounting for waste to be remediated across the nine sectors? Why is there not a table such as 7.10.2, as used for validating sector – central east, used for all sectors as nearly all contained demolished structures and some dangerous waste? Is there in existence an account of all structures on the site and their material?
- Since the SMFF relied upon a complex of boiler houses and steam power through asbestos lagged and asbestos pipes, why is it only in sector – central east – that any mention is made of underground services? Other sectors used such systems and extensive piping systems were employed to service water needs across the site and the gravity water towers kilometres away, many employing asbestos products it can be assumed. If one sector revealed 10,000m<sup>3</sup> of such material what validation system and assurance can be given for other areas? What volume of asbestos related piping systems does the Auditor estimate still exists beneath the ground?
- Lend Lease claim 800 structures were demolished in the Sites remediation process during the 1990's. What is the breakdown of buildings demolished in all sectors and the amounts of asbestos contained in those buildings? The Audit Report does not state who demolished the 800 buildings. Who were they? Are there any records of this process?
- Several companies were contracted to dispose of asbestos. Where they responsible for the disposal of all asbestos? Did they supply the Auditor with full documentation of volumes removed and destinations?
- In sector – central west – no mention is made of demolished structures and underground infrastructure except for B45. B 45 was used for “boil out” and would be assumed to contain a labyrinth of asbestos piping. No mention of asbestos disposal is made for this sector and the Report notes 7.7.2 that ADI could not validate disposal procedures or volumes. How much asbestos was in this sector and why is it the case ADI could not give recorded validation to support claims of its remediation?

- Why is it that Section 6 of the Report claims that asbestos had been dumped in Site 4 yet, section 7.6.2, 'Remediation and Validation Assessment' only mentions 6360m<sup>3</sup> of non-specific contaminated soil? Why was asbestos not clearly cited in volume to other waste and form?
- Section 7.2 claims that 19,780 tonnes of demolition materials including asbestos cement fibre and some asbestos was transported to three landfills. This is vague! What total tonnage was asbestos? Does this figure include the total of all asbestos removed from the site?
- Section 6 cites 43 areas investigated and the contamination found in them. Why is it that Site 24 (Areas A to M) does not mention asbestos since later in the report 7.8.2 a volume of 36,000m<sup>3</sup> of impregnated waste is mentioned? Area 24L contained a large asbestos dump. What part of this volume was asbestos related and what form did it take? Can its off site disposal be validated?
- Can the Auditor give an accurate account of the Central Stockpiles? In particular between what periods was each of them formed? What is in them? How many existed prior to the 1990's cleanup? What volume is contained within them?
- Are there records of the asbestos removal procedure citing; dates, volumes, nature of asbestos materials, final disposal site? Can the Auditor show documentation equating total asbestos found with that removed?
- What area of the site is the Auditor claiming is asbestos free? Are there any areas that the Auditor has reservations about?

We seek clarification to these matters to allay our concerns that the former ADI Site is free of asbestos and suitable for urban development and passive recreation uses.

Yours truly,



Geoff Brown  
 Convenor  
 ADI Residents Action Group