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Submission No. 2
(RAAF Williams)
Date: 19/07/2011

CONTAMINATION REMEDIATION WORKS

FORMER FIRE TRAINING AREA

RAAF Base, Point Cook, Victoria

Submission to the Public Committee Inquiry by Parks Victoria

As the Responsible Land Manager of Point Cook Coastal Park and Point Cooke Marine Sanctuary, Parks Victoria would like to make the following submission to the Public Committee Enquiry of the remediation of contamination at RAAF Base Williams, Point Cook.

Point Cook Coastal Park covers an area of 843 hectares, and lies directly adjacent to RAAF Base Williams. The park is an important area for visitor recreation, which is increasing dramatically due to the surrounding residential development and urban growth within the Wyndham Growth Area. The park also serves the vital role of managing habitat for migratory bird species protected under the Ramsar Convention. As land manager, Parks Victoria's highest priority is managing risk to its visitors and the environment, and therefore has a strong interest in understanding the full extent of existing threats and potential areas of concern.

Parks Victoria is in full support of the remediation efforts being made by the Department of Defence, particularly due to the high level of contamination and risk to the surrounding environment; however the full extent of contamination and associated risks are not fully understood and remain a concern. In response to the described contamination and proposed contamination remediation methodology, we have grouped our concerns under the following three headings:

1. Proposed remediation methodology
2. General issues in relation to the site
3. Further information required

1. **Proposed remediation methodology**

- 1.1. The proposed methodology to remediate the site (i.e. Thermal Desorption Technology) looks sound and of low risk. Due to the past activities of the burn pits, there is every chance that other contaminants will be encountered that will not be able to be treated using this methodology – e.g. heavy metals.

- 1.2. With regard to the above point, are there any heavy metals (e.g. lead) or other inorganic contaminants in the contaminated area that are of concern, and how will they be treated?
- 1.3. What measures will be in place to ensure the "treated material" is suitable to be used as backfill - assuming back to the site it was removed from?
- 1.4. There has been little detail to explain how the groundwater is to be treated. This should be provided, particularly as this poses an environmental risk to the Marine Sanctuary and may have potentially contaminated the lake. How is this issue of contamination leaching into the marine sanctuary being considered?
- 1.5. What are the potential risks to park visitors and staff at current levels of contamination and during the remediation process? Will Parks Victoria receive a risk management strategy for the proposed remediation process?
- 1.6. What level of noise will the remediation process generate? The Point Cook Coastal Park main visitor node is only 400m away, so will there be a risk of noise pollution?
- 1.7. Has there been any consideration to what effect the noise and lighting during the remediation process may have on the birdlife?
- 1.8. What is the risk of escaping dust particles during remediation, and will there be consideration to wind direction and the increased risk of park visitors being exposed?

2. **General Issues in Relation to the Site**

- 2.1. Are there any other contaminated areas on the RAAF Base that pose a risk to the surrounding environment and are these being adequately managed?
- 2.2. Has the lake been tested for contamination, and if there is contamination present, what are the implications and risks?
- 2.3. The coastline has been experiencing significant erosion which may pose a risk of contamination entering the bay via the groundwater.
- 2.4. There has been significant rainfall over the past year, which may have accelerated the movement of contamination in the groundwater. Has there been any testing to monitor this?

2.5. Due to the significant contamination, the boundary fence separating Point Cook Coastal Park will require some repair work and possible extension further into the Bay to prevent visitors from entering the site.

3. **More Information Required**

3.1. It would be informative for Parks Victoria to have a copy of detailed land contamination results for the Fire Training Area to gain a full appreciation and understanding of the potential risks to the environment and visitors to the park.

3.2. To assist in commenting on the environmental risk it would also be of benefit to be provided a copy of any monitoring results (sediment and water quality) that show the degree of impact of contaminants migrating from the site to the surrounding environment. It is documented that contamination was located 5m from the park boundary, which raises concerns that it may have entered the park.