

Jennings Former Arsenic Processing Plant Remediation Project Communications Plan

Project background

The former Jennings Arsenic Processing Plant Remediation Project exists within the broader Contaminated Land Management Program for Department of Planning, Industry and Environment, Crown Lands. The site is located between Duke, Manor, Robinson and Ballandean Streets, in Jennings, NSW. It is formally identified as Lot 114 in DP751490 and Lots 4-10 DP758540. Lot 114 was originally held under Special Lease 1923/5 Inverell for Business Purposes (Chemical Factory) by O C Roberts Ltd. The lease was forfeited in 1945 after being abandoned in the late 1920's. The Prickly Pear Poison made at the plant produced arsenic that caused contamination of the site and adjoining lands. Whilst there has been no further development of Lot 114 or several adjoining blocks of land, there are residential dwellings in close proximity to the contaminated area.

Remediation has been undertaken in the past, however, due to a water pipe on site the sediment basin was not as extensive as designed. It was constructed at only 50% of the design to contain a one-in-ten year storm event. As a part of the current Project, there are deliverables that involve the dissemination of communications to stakeholders impacted by site investigation and remediation. This communication plan will provide the framework for which stakeholder engagement is to be undertaken.

Goal & objectives

Goal

The goal of this communication plan is to ensure that stakeholder engagement and communications are appropriately catered for in the implementation of the Jennings Former Arsenic Processing Plant Remediation Project under the approved Voluntary Management Proposal No. 20191728 (dated 6 December 2019).

Objectives

Objective	Supports Corporate Plan:
Deliver communications to key stakeholders	Engage and collaborate, facilitating mutually beneficial relationships
Communicate information regarding the remediation and on ground works of the project to neighbouring landowners and the broader community	Engage and collaborate, facilitating mutually beneficial relationships
Ensure all stakeholders are informed of project actions, responsibilities and outcomes where required	Engage and collaborate, facilitating mutually beneficial relationships

Strategy

- Project Steering Committee (PSC) formed including agency representatives from the Environmental Protection Agency (EPA), Tenterfield Shire Council (Council), Department of Planning, Industry and Environment – Crown Lands, as well as consultants and contractors by invitation.
- Communications will be targeted to Council which will then assist in disseminating the information to the local community.
- District Crown Land Staff will contact neighbouring residents by way of door knock to distribute information.
- Communications will highlight the process of remediating the site, the nature of the works and benefits resulting from the project.
- Community consultation is to be undertaken during development of the Supplementary Detailed Site Investigation (SDSI) and Remedial Action Plan (RAP) to present information and receive questions and feedback.
- Provision of contact details to the community of the relevant project staff for liaison during project implementation through on-site signage and electronic communication.

Target audiences and stakeholders

Audience	Issues	Communication channels	Comments
Environmental Protection Authority (EPA)	Regulator of the site – Contaminated Land Management Act	Regular email, telephone and VC meetings	PSC Member
Tenterfield Shire Council	Local Government Authority	Onsite meetings and correspondence (phone/email) as required	PSC Member
Jennings Community	Adjoining landholders and local residents – directly affected by project and long-term management	Letter box drop, community liaison sessions, media releases, website, departmental contacts, face to face door knock, phone – all as required or when works or investigation commencing on site	
New South Wales Aboriginal Land Council	Aboriginal Land Claim (ALC) lodgement over site	Through DPIE – Aboriginal Land Claim Unit, Dubbo	Claimants have been advised of the contamination issue on site
Remediation contractor	Remediation implementation	Procurement process, Contract agreements	PSC Invitee
Remediation consultant	Specialist expertise and guidance	Contract agreements, scoping and investigation documentation	PSC Invitee
Department of Planning, Industry and Environment (DPIE) – Crown Lands	Landowner/manager – responsible for site and project management		PSC Member and Chair

Key messages

The key messages to stakeholders are:

- A sediment containment basin and clean water diversion channel direct water flow to eliminate
 potentially contaminated runoff from leaving the site.
- The Department is working with accredited specialist remediation consultants and contractors to ensure containment of any contamination (eg. sediment) associated with the former arsenic processing site.
- The contaminants of concern within the regulated area is arsenic, with lesser traces of lead.
 Sampling of soil and rainwater tanks has been completed by EPA outside the regulated area at
 surrounding residences. Arsenic levels in the soil and water (from rainwater tanks) were either not
 detected or were below the site-specific residential health investigation levels. Additional safety
 measures recommended include feeding chickens in containers rather than on ground if
 consuming their eggs.
- The public roads within the site have been closed following EPA notification and to minimise contamination exposure risk to the community.
- The Voluntary Management Proposal (VMP) is available to the public at no cost and can be found on the EPA website and the Crown Lands' website.
- All documentation related to this plan will be made available to the public via the EPA and DPIE –
 Crown Lands' websites (subject to commercial-in-confidence or private third-party restrictions).
- The community is welcome to contact any of the project staff as contact details are readily available.
- A Detailed Site Investigation (DSI) has been undertaken and a supplementary detailed site investigation (SDSI) has been done prior to on ground works commencing including the development of a Remedial Action Plan (RAP).
- All the activities at the site will be carried out in a manner that prevents or minimises the emission
 of dust, odour and noise from the site in line with the National Environment Protection Measure
 guidelines (NEPM).
- Monitoring Record Keeping and Reporting will continue to be undertaken until such time as EPA
 no longer considers that the contamination is significant enough to warrant regulation under the
 Contaminated Land Management Act 1997.
- The site will remain under a long-term management plan which will ensure continued risk mitigation to the community.
- It is the intent to remediate the site back to public open space once remediation is complete. Estimated to be by December 2021.
- All Plans and results are reviewed and/or approved by EPA.

Risks and contingencies

Risk	Contingency
Timeframes of outcomes (documents and works) not being met	PSC to hold stakeholder accountable for responsibilities
Inconsistent information being disseminated by multiple stakeholders	Crown Lands to review information prior to communications being released
Community members remain disengaged from the project	Make contact details available for individuals to gain further information if required

Jennings Former Arsenic Processing Plan Remediation Project - COMMUNICATIONS ACTION PLAN

Action	Description	Audience	Budget	Deadline	Responsibility	Indicator
Engage agencies in project	Include agencies in PSC to facilitate engagement	EPA, Council	Nil	Ongoing	DPIE - Crown Lands	EPA and Council engaged in PSC
Engage potentially affected community	Undertake letterbox drop and door knock	Adjoining and immediately affected landholders		Ongoing	DPIE – Crown Lands	
Engage general community	Undertake community liaison sessions. Signage to go up at Wallangarra Shop and Wallangarra Post Office	Community of Jennings and Wallangarra				
Inform media	Issue media releases at key stages of the project, specifically to Tenterfield Star, Stanthorpe Border Post and Your Local News newspapers and flyers	Communities of Tenterfield Shire and Southern Downs Region	At cost	Ongoing	DPIE – Crown Lands	Communities of Tenterfield Shire and Southern Downs Region are aware of project and progress
Update website	Upload relevant documentation or links to DPIE Crown Lands website	General community	Nil	Ongoing	DPIE - Crown Lands	General community able to access information relating to the project

Action	Description	Audience	Budget	Deadline	Responsibility	Indicator
Issue contacts	Issue list of contacts for information on project	General community	Nil	Ongoing	DPIE - Crown Lands	General community able to liaise with project staff to gain further information regarding the project
Record community engagement	Establish and maintain a community engagement Google sheet to record enquiries	Agencies	Nil	Ongoing	DPIE – Crown Lands, Council, EPA	Phone calls, counter enquiries, etc., recorded to enable reporting to agencies

Key project dates

February 2020	ERM consultants to commence testing - SDSI
May 2020	Results from SDSI received
August 2020	Remedial Options Assessment (ROA) and Remediation Action Plan (RAP) to be drafted
November 2020	EPA approval of ROA and RAP
January 2021	RAP implementation to commence
December 2021	Open public space of area

History and approval

Start date:	1 December 2019
Budget:	As approved through Contaminated Land Management Program Budget
Project contact:	Julie Richards – Group Leader, Landscape Services Centre 02 6883 5431
Approved by:	Richard Chewings – Manager, Natural Resource Services 02 6883 3314
Revision date:	23 March 2020
Copy to:	Corporate Communications, EPA, Tenterfield Shire Council

Evaluation

Evaluation of this plan and its effectiveness is to occur upon completion of this project. This will be completed as part of the project closure process.