

15th November 2024

Mirvac (c/- Envision Building Design)
Attention: Joseph Toth (Director)

RE: Contamination Advice for Proposed Childcare Centre, 2 Bullecourt Avenue, Milperra NSW (REV0)

1. INTRODUCTION

1.1 Overview

Sydney Environmental Group (SE) was engaged by Mirvac (c/- Envision Building Design) (the Client) to provide environmental consulting services as part of the DA application for the proposed childcare centre at 2 Bullecourt Avenue, Milperra NSW (the site).

In consultation with Mirvac and Envision Building Design, SE has the following appreciation for the site:

- The entire Western Sydney University Milperra Campus covers an area of approximately 18.83 ha;
- The majority site is proposed for redevelopment, comprising construction of low-density residential dwellings and associated roadways and infrastructure;
- A Phase 2 Environmental Site Assessment was undertaken within the student residence development area in 2011 by Coffey (Coffey 2011);
- A Soil Contamination Investigation was undertaken across the site by Noel Arnolds and Associates in 2011 (NAA 2011);
- A Preliminary Contamination Screening and Waste Classification Assessment was undertaken across the proposed oval facilities within the property boundary by Environmental Investigation Services in 2016 (EIS 2016);
- A Phase 1 Environmental Assessment Report was undertaken across the site in 2020 by JBS&G Australia (JBS&G 2020);
- A Detailed Site Investigation was undertaken across the site in 2020 by Alliance Geotechnical in 2020 (AG 2020);
- A Remedial Action Plan was prepared for the site in 2020 by Alliance Geotechnical (AG 2022);
- A Supplementary Stage 2 Detailed Site Investigation was undertaken within portions of the site by SE in 2024 (SE 2024a);
- A Hazardous Building Material Survey was undertaken at the site in 2023 and reported by SE 2024 (SE 2024b); and
- An Remedial Action Plan (RAP) was prepared to compliment the site's existing RAP (AG 2022) and address the remediation and validation of identified Areas of Environmental Concern (AEC) within the site and
- A letter detailing the nature and extent of contamination, as well as preliminary remediation / validation strategy is required to support an additional DA for alterations and additions to a proposed childcare centre (Building 28), associated car parking and proposed entry road and new footpath.

2. Objectives

The main objectives of this project is to:

- Prepare a contamination advice letter in addition to the previously prepared contamination documentation, to support the DA for the proposed childcare centre and associated infrastructure, per the requirements outlined within the State Environmental Planning Policy (SEPP) (Resilience & Hazards) (2021).

3. Scope of Work

SE undertook the following works to address the project objectives

- A desktop review of the relevant sections of the relevant contamination reports; and
- Preparation of one contamination advice letter, submitted in secure electronic (PDF) format, via email.

SE notes that this contamination advice was prepared by Steven Wallace, a principal consultant and Certified Environmental Practitioner, with over 10 years of experience in the assessment and management of contaminated land. Steven has also had significant contaminated land project experience on multiple comparable sites in the Canterbury-Bankstown Local Government Area, and is also currently managing the remediation on the adjacent sites in Milperra. As such, Steven is well versed in typical contamination risks associated with the redevelopment of the local area.

4. Discussion

A desktop review of the contamination assessments undertaken provided the following information

- Non-friable asbestos containing materials, in the form of fibre cement fragments, were observed / detected within shallow fill materials (where present) within the site, albeit not within the proposed childcare centre redevelopment zone;
- Friable Asbestos (FA) / Asbestos Fines (AF) was detected within a number of borehole locations across the site, but is considered to be localized, a result of hand augering activities, and has not been identified within the proposed childcare centre redevelopment zone; and
- Lead, cadmium and zinc impacted fill soils were identified within the site, localized to the proposed childcare centre redevelopment zone .

5. Conclusion

Based on this data, it is the opinion of SE that the contamination identified, is considered to typical of similar revelopment sites in the region and limited to shallow fill materials, and as such:

- All previous contamination assessments have been compared to the most conservative land-use criteria (HSLA/HILA/ESLA) outlined in the NEPM (2013), and therefore are considered to be suitable for use as part of the DA associated with the childcare centre at 2 Bullecourt Avenue, Milperra NSW;
- Supplementary Contamination Assessment and subsequent remediation works proposed are considered to be conservative in nature and in line with current legislation; and
- The site will be made suitable for the proposed childcare centre redevelopment following remediation / validation of the identified areas of environmental concern per the approved remedial action plan (RAP) and addendum remedial action plan (ARAP).

Based on the above, remediation and validation of the site can be readily achieved by:

- Remediation of the identified areas of concern (AECs) per the approved remedial action plan (RAP) and addendum remedial action plan (ARAP);
- Engaging an appropriately licensed remediation contractor to carry out remediation works;
- Preparing a waste classification with reference to NSW EPA (2014) for soils requiring excavation / disposal;
- Excavating and transporting the soils (where required) to a suitably licensed waste receiving facility for disposal, and maintaining records of that transport and disposal;
- Soil sampling and analysis would be undertaken by a suitably qualified environmental consultant to validate the success of the remedial works. SE notes that a validation methodology to do this would be included in the aforementioned remedial action plan. The methodology would likely include:
 - A visual inspection of the remediated areas, including collection of a photographic record of that remediated area;
 - Collection of representative soil validation samples from the base and walls of the remedial excavations as well as any treated materials, and analysis of those samples for respective contaminants of concern by a NATA accredited analytical laboratory; and
 - Comparison of the laboratory analytical results against remediation acceptance criteria. It is noted that if the analytical results did not meet the adopted remediation acceptance criteria, then further excavation and sampling works may be required.

- The success of the remediation and validation works will be included in a site validation report prepared by the environmental consultant for the project. The site validation report would be prepared with reference to the relevant sections of NSW EPA 2020, 'Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites' dated May 2020, ref: EPA 2020P2233, and include a conclusion on whether the site has been made suitable for the proposed childcare centre redevelopment in accordance with the NEPM ASC (2013).

6. Closure

We trust the information presented above satisfies Council's requirements under the State Environmental Planning Policy (SEPP) (Resilience & Hazards), for the purpose of the childcare centre redevelopment.

If you require any further information pertaining to the contamination status of the site, or the proposed remediation strategies, please do not hesitate to contact me.

Kind Regards,



Steven Wallace

Managing Consultant

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