



27 November 2015

Mr Brian Boyd
Payce Consolidated Limited
Level 37 Chifley Tower
2 Chifley Square
Sydney NSW 2000

Our ref: 210917447/interim
audit advice 1
Your ref:

Dear Brian,

Melrose Park, West Ryde, NSW
Interim audit advice – Technical Advice Support Remediation Strategy

1 Introduction

Andrew Kohlrusch of GHD Pty Ltd (an auditor accredited under the *Contaminated Land Management Act 1997*) has been engaged by Payce to conduct a site audit under the provisions of the CLM Act for the Melrose Park development, West Ryde (the site). The site comprises a number of contiguous properties at the following addresses (with former site occupants/users in brackets):

- 38 to 42 Wharf Road, West Ryde (Pfizer (Australia))
- 44 Wharf Road, West Ryde (Reckitt Benckiser (Australia))
- 44a Wharf Road, West Ryde (Big Sister Foods).

All properties are currently zoned Employment 4 IN1 General Industrial under the Parramatta LEP (2011). Payce intends to redevelop the site for residential (generally high rise apartments) and public open space. Given the former industrial uses at the properties that comprise the site, it will be necessary as part of the rezoning process for a planning authority (section 6 of State Environmental Planning Policy 55) to consider whether the land is contaminated and if contaminated, whether the land is suitable (or can be made suitable) for the all uses under the planned rezoning.

While the engagement of a site auditor is not a requirement by a planning authority, Payce considered that early engagement of a site auditor would assist in the rezoning application given the outcomes of investigations conducted to date at the site. Further details on the nature of the investigations and the approach that is proposed to address the identified (and potential contamination) is presented in the following section.

2 Background

The site comprises a number of former industrial complexes including Reckitt Benckiser, Pfizer and Big Sister. Environmental site assessments have been conducted at these properties, some of which have identified the presence of contaminated soil, groundwater and soil vapour. The most significantly contaminated area is a chlorinated solvent plume originating in the Reckitt Benckiser site and migrating



to the east into the Pfizer property. A remedial action plan has been prepared to address the chlorinated solvent plume and is currently being audited on behalf of Reckitt Benckiser by Andrew Lau of JBS&G.

Given the industrial use of the properties that comprise the site, further investigation (and perhaps remediation apart from that proposed for the chlorinated solvent plume) may be necessary before a site audit statement can be issued declaring the suitability of the site for residential purposes. Additional investigation (and remediation if necessary) would focus (at a minimum) on former underground and above ground storage tanks, fill material and process water delivery lines.

A remedial strategy has been prepared by senversa (*Technical Advice Support Remediation Strategy 44 Wharf Road, 44a Wharf Road and 38 - 42 Wharf Road, Melrose Park, New South Wales 24 November 2015*) that outlines the scope of investigations that have been conducted at the site, the proposed remediation of known contamination and data gaps that warrant further investigation. The strategy included:

- a summary of the known areas of concern and the associated chemicals and media of concern;
- a summary of the remedial action plan that has been prepared for the Reckitt Benckiser groundwater plume, including the additional work required to define the boundaries of the plume;
- a conceptual site model that identifies the sources of contamination, the potential contaminant pathways and receptors;
- a construction environmental management plan (CEMP) to be prepared prior to demolition of site infrastructure. The CEMP will have requirements for additional assessment beneath building footprints and unexpected findings.
- objectives for additional investigation and remediation. The strategy will include hazardous buildings surveys, additional soil, groundwater or soil vapour investigations at potential areas of concern – to be supported by sampling, sampling, analytical and quality plans and preparation of remedial action plans. Following completion of remediation of identified contaminated media, validation reports will need to be prepared that document the work has met the requirements of any remedial action plan(s) and state the suitability of the site.

Senversa concluded that the strategy would enable residential to proceed and a NSW EPA site auditor to certify that the site is suitable for mixed use development (including residential and commercial premises).

3 Auditor comments

The remedial strategy prepared by senversa is a systematic, staged approach that is consistent with the data collection (and assessment) and remediation methods presented in guidelines made or endorsed by the NSW EPA.

Given there are some activities still operation on the sites, it will be more appropriate and safer if investigations (and remediation if necessary) are conducted following the site being vacated and infrastructure (including building footprints) being demolished. The CEMP will provide the necessary protocols to collect additional site data to allow conclusions to be drawn regarding site suitability.



The site audit process could form conditions of consent for subsequent development applications and can be applied to additional investigations, remediation and validation. On the basis of the information and program articulated in senversa's remediation strategy, the site can be made suitable for the proposed residential rezoning following completion of all necessary assessment, remediation and validation works.

Yours sincerely
GHD Pty Ltd

A handwritten signature in black ink, appearing to read "Andrew Kohlrusch".

Andrew Kohlrusch
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