

29 June 2021

30 Auburn Road Pty Ltd
2A Gregory Place
Harris Park NSW 2150

Subject: 30-46 Auburn Rd, Regents Park NSW – Remedial Action Plan – Revision A

Sullivan Environmental Sciences Pty Ltd prepared the attached Remedial Action Plan (RAP) – Revision A for 30-46 Auburn Rd Regents Park (the site) to satisfy the requirements of the amended Gateway determination.

The revised RAP follows our Detailed Phase 2 Contamination Investigation (28 Jun 2021), which was completed to assess potential soil and groundwater health risks for future use of the land under a high-density residential setting and inform remediation, if required. The Phase 2 investigation sufficiently characterises the contamination status of the site and complies with the requirements of *State Environmental Planning Policy No 55—Remediation of Land 1998* (SEPP55).

Zoic Environmental Pty Ltd (Zoic) performed a technical review (March 2021) of our initial RAP (Sullivan-ES, Feb 2021) for the purpose of whether compliance of SEPP55 was met to support a proposed development application. Based on their review findings, Zoic made three recommendations on how compliance of SEPP55 could be achieved. We have addressed Zoic's recommendations as follows:

1. Conduct a more detailed assessment of historical investigation reports, undertake soil and groundwater sampling of the entire site, to include all the data gaps that are identified, underneath building footprints and groundwater and update the Remediation Action Plan if required.

Sullivan-ES has addressed this recommendation by completing a detailed Phase 2 contamination investigation to close off identified data gaps and prepared a revised RAP (attached).

2. If the above cannot be done, commence a new investigation which follows the requirements of the National Environmental Protection (Assessment of Site Contamination) Measure (1999) as amended 2013 including a Preliminary Site Investigation, Detailed Site Investigation and compilation of a Remediation Action Plan if required.

We confirm that the additional investigations and preparation of a revised RAP referred to in recommendation 1 were sufficiently completed, therefore recommendation 2 need not be addressed.

3. Engagement of an NSW EPA accredited contaminated land Site Auditor.

We cannot support this recommendation by Zoic. All investigation work completed at the site to date demonstrates that the site would be considered a low risk of contamination in its current state. Contamination is not widespread and limited to surface soils and localised to specific areas onsite. The proposed remediation method in the revised RAP to address the localised areas of concern is to excavate the shallow soils and remove offsite as waste to a landfill facility. This approach is relatively straightforward and not technically complex. To ensure that remedial activities and reporting are held to the highest standards, the RAP states that the environmental consultant engaged for remediation and validation is to be suitably competent in such activities and the validation report is to be reviewed and approved by a Certified Environmental Practitioner (CEnvP-SC) specialising in Site Contamination (under a scheme recognised by the NSW EPA). The Phase 2 and revised RAP have been reviewed and approved by the undersigned as a CEnvP-SC. This level of competency of the consultant is sufficient to ensure remediation and validation are conducted to the required standards to comply with existing regulations. We therefore consider engaging a NSW EPA accredited contaminated land Site Auditor to audit any contamination reports for the proposed development is not warranted.

We trust that the above information meets your requirements. Please contact the undersigned should you wish to discuss these matters further on (Mob) 0400 500 264.

Yours Sincerely

Sullivan Environmental Sciences Pty Ltd



Adam Sullivan (CEnvP – SC)
Principal Scientist and Director
BSc; Cert. Env. Law
CEnvP-SC #40944



Attachment

Remedial Action Plan – Revision A, 30-46 Auburn Rd, Regents Park NSW, Sullivan Environmental Sciences Pty Ltd, 29 June 2021.