

AUDITOR COMMENTS

Site: 84 Sheaffes Road, Kembla Grange NSW

Proposed Land Use: Mixed – Residential, Industrial

Client: Bluescope Steel Pty Ltd

Audited Reports: As per Interim Advice Letter#1 (1901020IA#1)

Consultants: Cardno Pty Ltd

Accredited Auditor: David Gregory (#1501)

Date of Review: 20.3.19

Interim Advice: #1

General	Auditor Comments	Consultants Responses
Auditors Scope	I understand the Auditors scope is to certify the residential and industrial zoned land only and not the Environmental Zoned Lands. Please confirm.	
Land Area	Please provide the land area (m2) for the residential parcel and each industrial parcel.	
Site History – PSI East and West	Auditor Comments	Consultants Responses
Aerial Photos	The interval of time between historical aerial photos is considered too large. Under these land use settings there is a lot of weight placed on review of aerial photos. Farm dams, sheds, pens, crops etc come and go, often at considerable frequency. To improve certainty of land use history please obtain aerial photos at an approximate frequency of 1 per decade. If additional areas of potential environmental concern are identified include an assessment of those areas in the SAQP.	
BHP ownership	Comment on the activities on the land since BHP ownership. i.e. land leased to graziers?	
WorkCover Search	For completeness conduct a search of WorkCover dangerous goods storage records for the property.	
Cropping	The report makes reference to potential cropping activities on the land. Can this be confirmed? What crops, when, where on the land? If there has been cropping there may be a need to assess large areas of land systematically for pesticides, herbicides, metals, nutrients etc.	

Areas of Potential Concern and COPC	<p>For fill related areas please include PCBs for completeness.</p> <p>For stockpile areas please include OCPs and PCBs for completeness</p> <p>For chemical storage area the types of chemicals and use history is poorly understood. In this instance uncertainty can be lessened with broad analytical screens. Please include VOCs, OCPs, OPPs, Phenols as COPC.</p>	
Farm Dams	I note in the western area there is a farm dam. The farm dam will need to be considered a potential area of contamination (water, soil, sediment, discarded wastes in the dam) and be investigated prior to issuing a Site Audit Statement.	
DSI Eastern Area	Auditor Comments	Consultants Responses
Site History	Comments as above, same limitations.	
DQO Sections	NEPM statistical data qualifiers not relevant to limited judgemental based sampling plans. Future reference.	
Well Logs	Provide well logs	
GILs	Preliminary assessment of groundwater requires evaluation against all GILs for consideration against basic land holder use rights (DEC 2007, Groundwater Guidelines). This may not be required if it can be determined the risk to groundwater from site sourced contamination is negligible.	
2017 Data	Please provide a rationale why the 2017 data is applicable to today's site condition	
Soil Stockpiles	Report indicates there were numerous stockpiles that have not been assessed. Detailed mapping and development of a register of all potential contaminant sources is required to progress to remediation / management.	
SAQP Western Residential Area	Auditor Comments	Consultants Responses
General	The SAQP is generally acceptable. It is understood this assessment is preliminary to establish what works are required to either characterise contamination, remediate contamination or validate the site.	
DQO Section	<p>Step 5 – the null hypothesis is the site is contaminated until proven otherwise. The use of the 95% UCL, SD and 2.5 times criteria to determine whether further investigation or remediation work is necessary is not appropriate at this stage of assessment because the sampling frequency is inadequate and the sampling plan is judgemental (biased) not statistical based (systematic).</p> <p>The study decision that needs to be made is “what further work is necessary to validate / remediate the site”. To make that decision some preliminary knowledge of the types of contaminants and their spatial extents are required. At the end of this study the null hypothesis will still apply.</p> <p>Consider and adjust DQO section.</p>	
Analytical Programme	<p>PAEC01 / 02/ 03– include some samples for PCB analysis</p> <p>PAEC03 – include VOCs and some sample for phenols.</p>	

Remnant Concrete Slabs	Where present exploration under the slab should be conducted. Asbestos waste is often discarded under concrete slabs in these rural settings.	
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