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18th March 2019

Mr Brian Moran
Bluescope Steel Ltd

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SUBJECT: Interim Audit Advice #1
SITE: 84 Sheaffes Road, Kembla Grange NSW

Dear Mr Moran,

I have conducted a review of the Preliminary Site Investigation Report (PSI) and a proposed Sampling Analysis Quality Plan for the western portion of the site. I have also considered the Preliminary Site Investigation and Targeted Site Investigation for the eastern half of the site. Both assessments have been carried out by Cardno Pty Ltd.

The subject site is approximately 107.76 hectares of rural land in Kembla Grange, NSW. It is understood approximately 50.68 hectares is to be developed for residential use and industrial use. Approximately 34 hectares of land on the western property margin is designated for residential land use. Two areas of land are proposed for industrial use in the eastern portion of the site. The remainder of the land between, and surrounding the two proposed development areas is zoned for Environmental Conservation and Management.

It is my understanding that Council require an Auditor to independently verify the site assessment and remediation work to confirm the suitability of the land for the proposed residential and industrial development areas. The remaining land is zoned environmental protection / management, is to be left untouched, and is not included in the development proposal. I do not need to consider the Environmental Management Areas to determine land use suitability for the Industrial and Residential Zones and do not consider the assessment of these areas within the Audit scope. So whilst Cardno may conduct assessment of other areas of the site, if they fall outside the land use footprints and have no impact on site use, I will disregard that information, unless of course there is a risk of significant impact upon human health and/or the environment.

The Cardno Reports have been prepared in general accordance with guidelines approved under s105 of the Contaminated Land Management Act 1994. It is evident from the work that has been carried out that the potential for contamination appears to be localised to areas of the site where fill has been placed or prior buildings have existed and since been demolished. A more thorough review of available historical aerial photos is necessary to ensure all areas of potential filling, former buildings, and former farm dams are identified. Please have Cardno conduct a review of aerial photos at a 10 year interval.

Preliminary investigations on the western side of the property were carried out in 2017. The investigation was exploratory for the purpose of identifying indicative contamination conditions on the land. A similar scope has been prepared for the eastern portion of the land. The areas investigated on the western portion of the land suggest contamination is localised to areas of fill or former buildings that have been

demolished. The preliminary assessment indicates there are aesthetic conditions (building wastes) and asbestos contamination that will need to be addressed. The relevance of the exceedances in soil ecological assessment levels requires further site specific evaluation.

It is evident there are many areas of localised contamination across a very large area. At present Cardno has identified areas of concern based on commonality of the issues. Whilst this is acceptable it is difficult to differentiate areas for communication and data assessment.

It is important that each area is clearly identified, characterised and independently evaluated for the purpose of defining an acceptable remediation / management proposal. To ensure future reports differentiate areas and clearly communicate the issues to stakeholders it is recommended Cardno adopt the following:

- Develop a tabulated register of areas of potential concern;
- Clearly identify each individual area on the site map with a designated name / numbering system for ease of communication;
- Communicate the issues for each individual area as determined by preliminary targeted works;
- Define estimated volumes and extents, as this will inform the characterisation work that needs to be completed.

With a register in place the approach for management / remediation for each specific area can be considered. Once the preferred management / remediation approach has been identified the assessment work for each area can be designed. An example is provided below:

“Racecourse Area – this area has been filled and the origin of fill is not known. It is desirable to use this fill material in the residential development proposal. To determine the suitability of this fill the following scope of works is required for characterisation in accordance with NEPM, i.e grid based statistical based sampling to identify a circular contamination hotspot at x size etc..”

“Creek Fill – this fill contains high levels of bonded asbestos and requires remediation. It is proposed to dispose this to landfill. The fill requires waste classification. It is proposed to characterise this waste in-situ in accordance with xyz” etc”.

I have made comments with respect to data gaps, inconsistencies, oversights, that may impact on the outcome of an Audit in the attached Auditor Comments Table. Those comments should be considered by the consultant and where necessary addressed or implemented for future investigations.

I have attached the table of comments in word version. To expedite the process I suggest the consultant address the comments in the Table and return to me for my records.

Please feel free to contact me should you have any further questions regarding this letter.

Yours sincerely



David Gregory
NSW EPA Accredited Site Auditor #1501

Limitations:

This interim advice does not constitute a site audit report or statement, nor does it pre-empt the conclusions to be drawn at the end of the site audit process.

Reports Reviewed:

Cardno Pty Ltd (Cardno 2017) Preliminary Site Investigation and Targeted Detailed Site Investigation, 84 Sheaffes Road, Kembla Grange, NSW. 15 March 2019 Ref: 8201714401_R001_Kembla Grange PSI-DSI-Redacted.docx.

Cardno Pty Ltd (Cardno 2018) Preliminary Site Investigation, 84 Sheaffes Road, Kembla Grange, NSW. 16 Nov. 2018 Ref: 8201911101 R003 Rev0.

Cardno Pty Ltd (Cardno 2019) Draft Sampling Analysis & Quality Plan, 84 Sheaffes Road, Kembla Grange, NSW. 12 March 2019 Ref: 8201911101_R006_Kembla Grange_SACP_RevA.docm.