

ATTN: Darren Hogan

20/08/2024

Hogan Planning  
7/14 Wingecarribee St,  
Bowral, NSW, 2576

**Re: Response to Council**

Darren,

Please find below our responses regarding request for clarification of the points below in the email from Dialina Day, Representative from Goulburn Council, dated 16 April 2024.

*Point 3: The supplementary Detailed Site Investigation (DSI) report indicates elevated levels of Chromium in several of the soil samples, with one of those samples exceeding the HIL-A criteria. No explanation or emphasis was provided for this, nor is the location and potential sources of elevated Chromium identified. Further consideration and explanation is required, including the potential sources of the elevated Chromium levels and whether the levels present are a constraint to residential development.*

*Response: An explanation of the results for total chromium in the TLCP testing indicate the levels are below the HIL-A requirements for chromium (VI) when tested under TLCP. This was included in the report. The owners questionnaire indicates that the current owners have no knowledge of any chemicals or usage of the area where the total chromium was found in the soil that could explain why there is an elevated levels of total chromium in this location.*

*A review of historical photographs indicates the area where the chromium was found has only been used as a cattle yard or open paddock and the area has not had any specific contaminants, sheds of other works, uses conducted in the area that could indicate why total chromium was found.*

*There were no cattle dips or other use that could contaminate the area with total chromium in historical photographs.*

*Further consideration of risk of contamination from any existing on site waste water management systems is required. The decommissioning of the existing systems also requires consideration.*

*Onsite waste water was to be covered when the residential dwelling is to be demolished and removed. The dwelling is currently still in use as a residential house.*

*Additional matters that require consideration are below:*

*-An assessment of the leaching potential of Chromium in soil is required according to the Australian Standard Leaching Procedure (ASLP).*

*HIL-A is references levels for chrome six (CrVI) only and has no reference to total chromium. Soils were tested for total chromium which includes chrome II, III & VI and is included in the TLCP testing for total chromium. These results for total chromium were compared against the HIL-A criteria for Chromium (VI) in the report. Chromium (VI) is the lowest proportion of the total chromium in soil.*

*-Surface and groundwater sampling is required to be carried out to determine any potential risk.*

*Surface and ground water was not considered for sampling as the water source of all flowing water in the gully is from the fresh water supply pipe running through this property. The water source was followed from the location of the pipe to the gully.*

*The requirements of the National Environment Protection (Assessment of Site Contamination) Measure must be followed.*

*Further reporting and recommendation (as to the suitability of the site for future residential development) is required*

*The house on the site and all associated equipment such as waste water will be removed when the house is demolished and all associated testing of the soil for waste water drainage will be completed at this stage. The house is still occupied and being used as a residence.*

*Point 4: In regard to the Detailed Site Investigation (DSI), clarification is required as to whether the pit housing the animal carcasses is in the same location as the rock formation, and whether the effectiveness of disposal has been considered against the NSW Department of Primary Industries 'Animal Carcass Disposal' Fact Sheet dated March 2021 as recommended in the PSI report.*

*Response: A pit was excavated in accordance with the NSW Department of Primary Industry (DPI) guidelines for "Animal carcass disposal" and all carcasses on site at the time were placed in the pit and covered in accordance with the DPI guidelines.*

*The rock formation was a shallow area where the current owner had located and stored the carcasses. The pit where the animal carcasses were disposed of is in the general location of the rock formation.*

*Point 5: Can you please confirm whether fill material remains in the gully and the erosion status of the gully.*

*Response: All fill materials, concrete, tyres and other man-made products have been removed along this location. All other materials are naturally occurring materials for this location. No erosion has occurred in the gully.*

Regards,

Kevin King  
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