

18 June 2010

Commercial-in-Confidence

Leanne Mariani
Environmental Projects Officer
ESD Group
Bankstown City Council
66-72 Rickard Road
Bankstown NSW 2200

Dear Leanne,

Re: Development Documentation Relating to Soil Contamination - 24 (Lot 38 in DP1031735) Muir Road, Chullora

1.0 Introduction

I refer to the meeting of 17 June 2010 meeting between myself, Commercial and Industrial Property Pty Ltd (CIP), yourself and Mr Ray Lawlor from Bankstown City Council (BCC), to discuss the Development Application (DA) currently under assessment by BCC for 24 (Lot 38 in DP1031735) Muir Road, Chullora (the Site),.

At that meeting, BCC requested a letter clarifying what documentation would be prepared to manage the proposed development from an Environmental (land contamination) perspective, and the purpose of each of these documents. This letter is provided to address BCC's request.

2.0 Background

As BCC is aware, CIP intend to redevelop the Site for commercial / industrial use by Volkswagen, including construction of a warehouse building, offices and associated car parking and access/egress roadways. Prior to proceeding with the purchase of the Site, CIP commissioned AECOM to assess the existing information and current Site conditions, and to identify any potential conditions or requirements for the proposed commercial industrial development, with respect to contamination.

The outcomes of the assessment conducted by AECOM are presented in AECOM's letter dated 3 June 2010 and titled "*Review of Existing Environmental Information – 24(Lot 38 in DP 1031735) Muir Road, Chullora*". In summary, AECOM's review concluded that the Site would be suitable for the proposed development on the condition that a capping layer is placed on the Site and various documents are prepared to manage the Site, from an environmental perspective, during the proposed development and subsequent Site use. Based on AECOM's assessment, the following environmental management documents will be prepared:

- A Remediation Works Plan (RWP), detailing any earthworks proposed as part of redevelopment, and the form of the proposed capping strategy for the Site;
- An Environmental Management Plan (EMP), including an Asbestos Management Plan (AMP), to be implemented during the redevelopment works;
- A Site Condition Report that confirms the post-redevelopment condition of the Site; and
- A Site Management Plan (SMP), incorporating an AMP, to be implemented at the Site upon completion of the redevelopment works.

The above documents are discussed in greater detail in the sections below.

3.0 Remediation Work Plan (RWP)

AECOM will develop a RWP as a technical guide to the bulk earthworks and other activities required during redevelopment, including the form and construction of the capping layer. The RWP will:

- Be produced with reference to applicable NSW EPA and DECC guideline documents, , SEPP 55, and BCC's Contaminated Land Policy, and in accordance with the "*Guidelines for Consultants reporting on contaminated Sites, 1997*";

- Incorporate CIP's proposed plans for the Site; and
- Discuss any future management/monitoring requirements.

For completeness, the RWP will incorporate the EMP described below.

4.0 Environmental Management Plan

AECOM will develop an EMP for implementation during the redevelopment works at the Site which, we understand, consist of levelling of the site through a cut-and-fill operation and capping of the fill materials.

The EMP will be developed specifically to manage asbestos contamination identified at the site and will comply with the following National Occupational Health and Safety Commission (NOHSC) publications:

- Code of Practice for the Management & Control of Asbestos in Workplaces [NOHSC:2018(2005)];
- Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC:2002(2005)]; and
- Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC:3003(2005)].

The EMP will contain the following information:

- Background and scope;
- Reference to previous investigations,
- Overview of site contamination status;
- Overview of the hazards posed by asbestos;
- Objectives;
- Management responsibilities;
- Regulatory framework;
- Licence and permit requirements;
- Consultation requirements;
- Procedures for excavation, loading, transport, re-use/disposal and capping of the asbestos impacted materials that minimise the risk of human exposure to asbestos and environmental contamination;
- Occupational Health and Safety (OHS) requirements including Personal Protective Equipment (PPE);
- Decontamination equipment and procedures;
- Emergency procedures;
- Air monitoring and validation/clearance requirements.

The EMP will include the current AMP for the Site which is identified as "Asbestos Management Plan, Lot 28 in DP1007364 Muir Road Chullora NSW 2190" developed by Enterra Pty Ltd (Enterra Ref: 495100AMP-R02.doc) and dated 9 April 2002 (Enterra 2002). The AMP will be modified where appropriate to allow for changes in PPE and general operational requirements on the basis of initial personal and control monitoring for asbestos. The AMP will be reviewed and approved by an Occupational Hygienist.

4.1 Airborne Asbestos Monitoring

AECOM will conduct monitoring for airborne asbestos fibres during the earthworks.

Air monitoring, sample analysis and reporting will be conducted by National Association of Testing Authorities (NATA) certified signatories and counters in accordance with the NSW Occupational Health and Safety Regulation (2001) and the NOHSC Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC:3003(2005)].

AECOM will provide a NATA endorsed airborne asbestos monitoring report for each day of monitoring conducted.

In accordance with the AMP AECOM will conduct control monitoring in static locations around the boundary of the Site, and at other selected locations such as decontamination zones and lunch room, during the earthworks. The purpose of the control monitoring is to assess the effectiveness of the control measures adopted during the earthworks, and confirm whether they are adequate in terms of preventing potential asbestos contamination to surrounding areas.

AECOM will also conduct some personal exposure monitoring for airborne asbestos fibres during the initial stages of the earthworks. The purpose of the exposure monitoring will be to enable timely review and modification of the AMP with respect to PPE (including respiratory protective equipment) and general operational requirements.

We anticipate that exposure monitoring will be undertaken over the first week of earthworks, depending on site conditions.

5.0 Site Condition (Validation) Report

Subsequent to completion of the development AECOM will develop a Site Condition (Validation) Report. The Site Condition Report will discuss observation during the earthworks and the quality of any fill materials imported onto and will include a discussion of the airborne asbestos control monitoring undertaken by AECOM during the remediation works. The aim of the report is to confirm that the remediation works were conducted in accordance with the RWP including the final form of the capping implemented at the Site. The Site Condition Report will be prepared in accordance with the NSW EPA "Guidelines for Consultants reporting on contaminated Sites, 1997" and will inform the SMP discussed below.

6.0 Site Management Plan

Subsequent to the Site Condition (Validation) Report, AECOM will develop a SMP. The purpose of the SMP will be to outline the management measures required during future use of the site to ensure that the risk of exposure to asbestos and environmental contamination is maintained at an acceptable level.

The SMP will comply with the National Occupational Health and Safety Commission (NOHSC) publications referenced in **Section 4.1** of this letter and the NSW EPA "Guidelines for Consultants reporting on contaminated Sites, 1997"

The SMP will contain a similar range of information to that in the EMP, however the information in the SMP will reflect the revised status of contamination at the Site as outlined in the Site Condition (Validation) Report, and will also include:

- the inspection and maintenance activities required to ensure the integrity of the capping layer; and
- procedures to be followed if intrusive works are conducted on the capping layer and/or underlying materials.

The SMP will be reviewed and approved by an Occupational Hygienist.

7.0 Closure

We trust the above meets BCC's requirements. Please do not hesitate to contact the undersigned if you wish to discuss the proposed documentation in more detail.

Yours sincerely,

AECOM Australia Pty Ltd



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