

FDC Construction & Fitout Pty Ltd ABN 44 120 295 034

22 - 24 Junction Street
Forest Lodge NSW 2037 Australia
T 61 2 9566 2800 | F 61 2 9566 2900
www.fdcbuilding.com.au

Sydney | Melbourne | Brisbane

28th April 2017

The General Manager Cumberland Council 1 Susan Street, AUBURN NSW 22144

To whom it may concern,

# RE: CLAUSE 4.6 VARIATION – PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2011 54-68 FERNDELL STREET, SOUTH GRANVILLE - LOT 50 IN DP816718 EXCEEDANCE OF HEIGHT – DEVELOPMENT STANDARD (CLAUSE 4.3)

FDC Construction and Fitout Pty Ltd (FDC) is acting on behalf of Grand Sasanqua Pty Ltd, the owners of the site, and Jaycar Electronics Group, the future occupant of the site to design and construct the proposed facility.

The proposed development will include the construction of one large industrial building and multiple smaller industrial buildings that will be used by Jaycar Electronics Group for the purposes of 'warehouse and distribution' activities. The proposal also includes the refurbishment and fitout of an existing administration building on site, car parking, landscaping and installation of associated services and infrastructure.

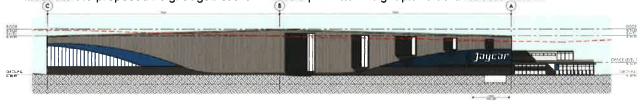
The proposed development involves the construction of 3 warehouse buildings, each which is proposed to be constructed to a height of 13.7 metres (at the main ridge line). This would contravene Clause 4.3 of the Parramatta Local Environmental Plan 2011 that permits a maximum height of 12 metres for new development.

Clause 4.6 of *Parramatta Local Environmental Plan 2011* relates to 'Exceptions to development standards' and allows the consent authority to consider, <u>'a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating:</u>

- a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and
- b) that there are sufficient environmental planning grounds to justify contravening the development standard'.

The following section provides such justification and confirms that the proposal is, 'in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone'.

JEG's decision to construct a 13.7 metre high warehouse reflects the availability of contemporary storage and retrieval infrastructure as well as fire protection infrastructure. The attached architectural images illustrate the proposed height against the 12 metre permitted height plane as illustrated below.



21 for France



#### Clause 4.6 - Exceptions to Development Standards

Test Comment

#### IN1 General Industrial - Zone Objectives

To provide a wide range of industrial and warehouse land uses.

The proposal involves the construction of a new warehouse for Jaycar Electronics Group to undertake storage and distribution of their products throughout Australia and New Zealand.

To encourage employment opportunities.

JEG will directly employ 230 staff to operate the facility. The majority of these staff will relocate form the existing Rydalmere facility. Overtime, as the company expands, further employment opportunities will exist to the benefit of the local and regional community.

To minimise any adverse effect of industry on other land uses.

This report has assessed potential impacts of the proposal on existing land uses and has proved that any impacts are minimal or can be appropriately mitigated. Such impacts should be considered in the context that the broader locality is zoned for the purposes of industrial development, despite there being potential conflict with nearby residential properties.

The proposed building height does not result in overshadowing impacts that would affect current or future adjoining land uses. While it will result in visual impacts for the site and locality, such impacts are mitigated through the retention of existing (and established) landscape setback to Ferndell Street. The positive visual benefits of constructing a new architecturally designed building will favourably contribute to the streetscape along Ferndell Street.

To support and protect industrial land for industrial uses.

The proposal involves industrial development on industrially zoned land.

To facilitate a range of nonindustrial land uses that serve the needs of workers and visitors. Not applicable with reference to the height of the proposal.

#### Clause 4.3 Height of Buildings (Objectives)

(a) to nominate heights that will provide a transition in built form and land use intensity within the area covered by this Plan The maximum height established by the LEP is appropriate in the context of the older style industrial development seen throughout the locality. The size and scale of the proposed development (and site) is unique in the context of this location but extremely commonplace in more recently developed industrial areas such as Eastern Creek and Erskine Park. Warehouses of this nature (at a height of 13.7 metres) are common place in such locations.

(b) to minimise visual impact, disruption of views, loss of privacy and loss of solar access to existing development,

While the proposed development will result in visual impacts for the site and locality, such impacts are mitigated through the retention of existing (and established) landscape setback to Ferndell Street. The positive visual benefits of constructing a new architecturally designed building will favourably contribute to the streetscape along Ferndell Street. The development will not result in the loss of views, privacy or solar access associated with any nearby residential development. It is considered appropriate in the context of this primarily industrial locality.

(c) to require the height of future buildings to have regard to heritage sites and No heritage sites or buildings are locality within close proximity of the site. Therefore, the proposed building heights should be considered appropriate in this regard.



Test Comment

their settings

(d) to ensure the preservation of historic views,

The proposed development will not affect any historic views.

(e) to reinforce and respect the existing character and scale of low density residential areas. The proposed development will take place on an industrial zoned site and will generate significant employment opportunities and economic benefits for the locality. Whilst there are residential properties in close proximity, impacts associated with the new development can be mitigated through good architectural design and the retention of existing vegetation along Ferndell Street.

(f) to maintain satisfactory sky exposure and daylight to existing buildings within commercial centres, to the sides and rear of tower forms and to key areas of the public domain, including parks, streets and lanes.

Despite bot being within a commercial centre, the proposed height exceedance will not affect sky/daylight exposure.

#### Is compliance unreasonable or unnecessary in this instance?

If compliance with maximum height provisions contained in Clause 4.3 were to be enforced, the proposal would not proceed. Having undertaken an extensive search for suitable sites, alternatives would need to be reconsidered including sites in other localities (potentially outside of NSW).

Given the importance of the proposed variation to the viability of the overall project it therefore seems unreasonable or unnecessary to enforce the maximum height limit, given that few environmental impacts are anticipated.

The proposed variation will facilitate the operation of an industrial warehouse facility that will employ 230 people. It is therefore reasonable and necessary to support the proposed variation in order to achieve the objectives nominated for the IN1 General Industrial Zone.

#### Environmental planning grounds justifying the contravention of height

The following points summarise the planning merits associated with the proposed contravention of the nominated height requirement:

- The proposed variation does not result in any overshadowing impacts that would affect the amenity or operation of current or future development on adjoining properties;
- The proposed structure has been designed to a high architectural standard ensuring that the development will result in positive impacts on the streetscape. Existing landscaping (including many advanced trees) will be retained within the Ferndell Street setback to mitigate the impacts of new development on site.
- The proposed warehouse has been designed and positioned to ensure that it is integrated with the overall development.
- The overall development has been designed to ensure that a high standard of built form and urban design is achieved. As the locality evolves over coming years, the proposal will be well suited in the context of surrounding development;
- Efficiencies generated by increasing the height of the proposed



Test Comment

facility also benefit the environment by reducing the potential footprint of the building;

JEG will directly employ 230 staff to operate the facility.

#### Is the proposed variation in the public interest?

The proposal to construct a 13.7 metre high structure to accommodate JEG's operation is in the best interests of the public. The benefits in allowing JEG to establish a localised, and purpose built facility will include:

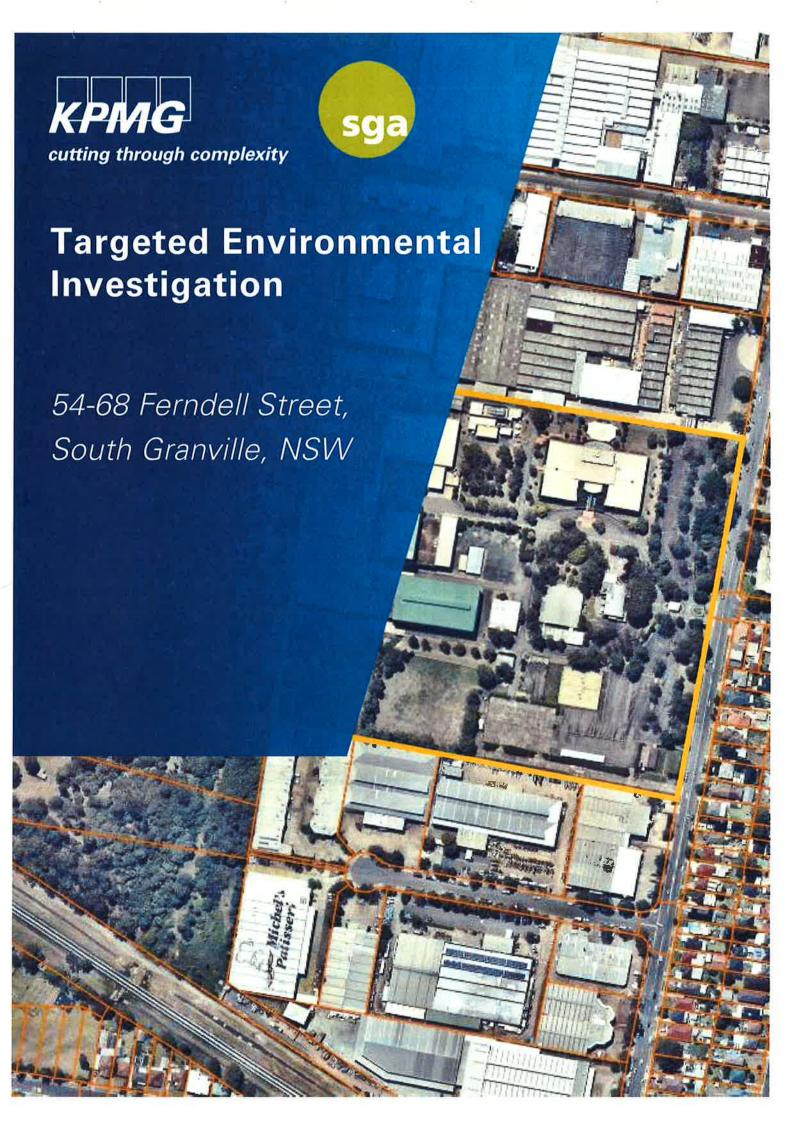
- The employment of 230 people within an area defined to accommodate employment opportunities;
- The construction of appropriate facilities to establish and grow JEG's business;
- The proposed development is generally consistent with the public's expectations for development of the South Granville Industrial Area and more specifically the IN1 General Industrial Zone;
- The proposed variation is consistent with the objectives of Clause 4.3 in regard to height controls for development and certainly represents an example of applying Clause 4.6 to create flexibility where development standards seem unreasonable or unnecessary;
- While it will result in visual impacts for the current environment, such impacts are mitigated through good design and the retention of established trees within the landscape setback to Ferndell Street.

It is requested that Council consider this variation request and permit the development as proposed despite non-compliance with a development standard of the LEP. Should you have any queries in relation to this documentation, please contact the undersigned on 8117 5104 or 0401 061 119.

Yours sincerely

**FDC Construction and Fitout Pty Ltd** 

Tim Bainbridge Planning Manager





Prepared for:	Grand Sasanqua Pty Ltd 320 Victoria Road Rydalmere NSW 2116
Prepared by:	KPMG SGA Property Consultancy Pty Ltd ABN 53 103 479 992
THE PART	Tower 3, International Towers Sydney 300 Barangaroo Avenue Sydney NSW 2000

KPMG SGA Document Control			
KPMG SGA Project No.:	<b>314465.01</b> Date(s) of Investigation: 20-29 June 2017		20-29 June 2017
File name:	314465.01 - 54-68 Ferndell Street South Granville NSW - Targeted Environmental Investgation - KPMG SGA FINAL 04-08-17,docx		
Issue Number:	Date Issued: Report Status:		Report Status:
01	20 July 2017 DRAFT		DRAFT

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#### **Appendices**

Appendix A	Development Plans
Appendix B	URS Site Layout Figure
Appendix C	Soil Borelogs
Appendix D	Laboratory Certificate of Analysis
Appendix E	Data Quality Assessment





BTEX	Benzene, Toluene, Ethyl benzene, Xylene		
CEC	Cation Exchange Capacity		
CEMP	Construction Environmental Management Plan		
COCs	Chemicals of Concern		
CSM	Conceptual Site Model		
DA	Development Application		
DCB	Dichlorobenzene		
DO	Dissolved Oxygen		
DQO	Data Quality Objective		
EC	Electrical Conductivity		
EILs	Environmental Investigation Levels		
EPA	Environmental Protection Authority		
ESLs	Environmental Screening Levels		
GILs	Groundwater Investigation Levels		
HILs	Health Investigation Levels		
HSLs	Health Screening Levels		
LOR	Limit of Reporting (laboratory)		
mbgl	Meters Below Ground Level		
MDQls	Measurement Data Quality Indicators		
NAPL	Non-aqueous Phase Liquid		
NATA	National Association of Testing Authorities		
NEPM ASC	National Environment Protection Council (1999) National Environment Protection (Assessment of Site Contamination) Measure (NEPM) (Amended 2013)		
ORP	Oxidation Reduction Potential		
PAHs	Polycyclic Aromatic Hydrocarbons		
PCBs	Polychlorinated Biphenyls		
PSI	Preliminary Site Investigation		
QA/QC	Quality Assurance / Quality Control		
SWLs	Standing Water Levels		
TCE	Trichloroethene/Trichloroethylene		
TEI	Targeted Environmental Investigation		
TPH	Total Petroleum Hydrocarbons		
TRH	Total Recoverable Hydrocarbons		
TRVI	Toxicity Reference Value Inhalation		
USTs	Underground Storage Tanks		
VC	Vinyl chloride		
VOCC	Volatile Organic Chlorinated Compounds		
VOCs	Volatile Organic Hydrocarbons		





# 1 Executive Summary

KPMG SGA Property Consultancy Pty Ltd (KPMG SGA) was engaged by Grand Sasanqua Pty Ltd (Grand Sasanqua) to undertake a Targeted Environmental Investigation (TEI) at 54-68 Ferndell Street, South Granville NSW (the site). The site was historically used as a chemical manufacturing and research facility by Merck Sharp and Dohme (MSD) since the mid-1950s. Currently the site is owned by Grand Sasanqua with the majority of the site buildings subject to demolition as part of the preliminary Jaycar Electronics Group (JEG) development works. Refer to the KPMG SGA (2017) PSI for a more detailed description of the site's history including previous environmental investigations and remediation works.

A PSI assessing the historical contamination at the site was submitted as part of a Development Application (DA) for the proposed JEG commercial head office and main product storage and distribution facility. The proposed development plan has been summarised in the PSI.

This TEI will be submitted as a supplementary report for the DA addressing the identified data gaps from the PSI.

KPMG SGA's PSI assessed the potential for site soils, soil vapour and groundwater to be impacted by chemicals of concern (COCs) which may affect the suitability of the site for the proposed commercial/industrial JEG development. The proposed development involves the construction of three on-grade warehouses and offices over the central portion of the site. Review of preliminary cut and fill plans indicates fill shall be added to the majority of the building central footprints (Appendix A).

The central portion of the site has been subject to previous contaminating activities associated with its historical land use. The main COCs of concern including chlorobenzenes (volatile organic compounds [VOCs]), BTEX, petroleum hydrocarbons and lead. In addition, the site has previously undergone remediation associated with pharmaceutical waste disposal and arsenic impacted soils.

The conceptual site model (CSM) in the PSI highlighted the following human health risks:

- future site users may be exposed to inhalation of VOCs through vapour intrusion to proposed central warehouse building, associated with the BRW2 plume. Refer to Figure 2 and the URS Figure in Appendix B
- future site users may be exposed to inhalation of BTEX and petroleum hydrocarbons through vapour intrusion within the proposed building / warehouse
- there may be potential for site workers to encounter impacted soils during localised earth moving works associated with construction and ongoing site use.

The objectives of the TEI were too assess the risk of:

• the presence and nature of volatile organic compounds within soil vapour beneath the central portion of site associated with the known chlorinated benzene groundwater plume, with consideration for the DA's commercial and industrial use







 the presence and nature COCs within soil beneath the central dock area, Dangerous Goods depots 5 and 6 and areas of former USTs with consideration for the DA's commercial and industrial use.

The TEI comprised of the following work:

- drilling, soil sampling and analysis of 16 targeted boreholes across the site
- groundwater sampling and analysis of 7 selected existing ground water wells
- installation, sampling and analysis of 7 soil vapour wells.

Based on the findings of the TEI undertaken, KPMG SGA consider that the site is suitable for the proposed JEG commercial/industrial development providing the below recommendations are followed. KPMG SGA form this opinion due to the fact that:

- No COCs were identified above the adopted guidelines in the soil samples collected and analysed.
- No COCs were identified above the adopted guidelines in the soil vapour samples collected.

Concentrations of benzene, chlorobenzene, 1,2 dichlorobenzene, 1,4 dichlorobenzene concentrations were detected above the adopted criteria at groundwater well BRW2. Potential inhalation of VOCs by future site users remains a possibility due to the proposed construction of the warehouse building in association with the BRW2 plume. KPMG SGA recommends the following:

- a construction design that would not cause a preferential vapour pathway to the newly constructed building. If this is not possible a more detailed risk assessment will be required to assess the appropriate vapour controls for the building / warehouse
- ambient air testing prior to occupation of the building to validate that the COC vapour intrusion is not entering the building
- annual groundwater monitoring of wells BRW2, BRW3, BRW4 and BRW5 to assess the trends of the chlorinated benzene plume.

A Construction Environmental Management Plan is recommended to be produced by an environmental consultant to include:

- an unexpected findings protocol specifying how to manage identification of potential contamination (such as asbestos) during the development works
- soil management including separation, stockpiling, testing, classification, and offsite disposal in accordance with NSW Waste Classification guidelines
- groundwater management in the event that groundwater is encountered during the development.





### 2 Introduction

KPMG SGA were engaged to undertake a Targeted Environmental Investigation (TEI) at 54-68 Ferndell Street, South Granville NSW (the site), refer to Figure 1. This TEI should be read in conjunction with the KPMG SGA (May 2017) Preliminary Site Investigation, 54 – 68 Ferndell Street South Granville, NSW (PSI).

A Preliminary Site investigation (PSI) assessing the historical contamination at the site was submitted as part of a Development Application (DA) for the proposed Jaycar Electronics Group (JEG) commercial head office and main product storage and distribution facility. The proposed development plan has been summarised in the PSI.

This TEI will be submitted as a supplementary report for the DA addressing the identified environmental data gaps from the PSI.

KPMG SGA confirm that this report for KPMG SGA project 314465.01 and issued on 20 July 2017 and 4 August 2017 has been prepared for the benefit of Grand Sasanqua in accordance with the agreed scope of work set out in our executed Enagement Letter, dated 9 June 2017.

A party, other than Grand Sasanqua, may only rely on the report if it has executed a formal Letter of Reliance with KPMG SGA. If you have not executed a formal Letter of Reliance with KPMG SGA and you choose to rely upon the report or any part thereof you will do so entirely at your own risk.

#### 2.1 Background

The site was historically used as a chemical manufacturing and research facility by Merck Sharp and Dohme (MSD) since the mid-1950s. Currently the site is owned by Grand Sasanqua with the majority of the site buildings subject to demolition as part of the preliminary JEG development works. Refer to the KPMG SGA (2017) PSI for a more detailed description of the site's history including previous environmental investigations and remediation works.

KPMG SGA's PSI assessed the potential for site soils, soil vapour, or groundwater to be impacted by chemicals of concern (COCs) which may affect the suitability of the site for the proposed commercial/industrial JEG development.

The proposed development is the construction of three on-grade warehouses and offices over the central portion of the site. Review of preliminary cut and fill plans indicates fill shall be added to the majority of the building central footprints (Appendix A).

Until 2003 MSD were required to conduct and provide groundwater monitoring round reports to the NSW Environmental Protection Authority (EPA). Ongoing annual groundwater monitoring continued till January 2014, with additional groundwater monitoring conducted by KPMG SGA in 2016. A chlorinated benzene plume at BRW2 was NSW EPA's main concern, however correspondence between the EPA and MSD in 2003 detailed that the EPA was satisfied that the plume was not migrating offsite. The subsequent GMEs have since validated this statement.





The PSI identified the following locations, activities and COCs as summarised in Table 1. Solomon's Hill and the site's general fill material is not part of this investigation as it has either been previously assessed or will not be affected by the proposed development. Refer to Appendix B for URS Historical Site Layout Figure (URS, November 2013, Environmental Site Investigation, Merck Sharp and Dohme, South Granville NSW [Reference 9]).

**Table 1 Summary of Historical Contaminants of Concern** 

Location / Source	Activity	COC
Deeper semi confined shale groundwater plume within centre of the site in vicinity of BRW2. Solomons Hill	Former chemical manufacturing building. Residual bedrock impact following excavation and remediation.  Stockpiling of remediated landfill waste. (characterised and remediated).	Chlorobenzenes (1,2-Dichlorobenzene, 1,3- Dichlorobenzene and 1,4- Dichlorobenzene) Chlorobenzenes and residual pharmaceutical product
Former USTs in the vicinity of the former chemical building, central loading dock, admininstration building and former Lan-O-Leen building.	Former fuel, oil and mineral spirit USTs removed as part of remediation program in 1987	Hydrocarbons BTEX VOCs Lead
Central Dock and Dangerous Goods Depot 5 and 6	Former tank and drum storage and USTs. Formerly stored waste oils, alcohols, ethanol and solvents.	Hydrocarbons VOCs
Entire site	General fill material	Surficial asbestos

#### 2.2 Objective

The objective of TEI was to assess the risk associated with data gaps identified in the PSI and assess the implications of such risks to the proposed development, as listed:

- The presence and nature of volatile organic compounds within soil vapour beneath the central portion of site associated with the known chlorinated benzene groundwater plume, with consideration for the DA's commercial and industrial use.
- The presence and nature COCs within soil beneath the central dock area,
   Dangerous Goods depots 5 and 6 and areas of former USTs with consideration for the DA's commercial and industrial use.

#### 2.3 Scope of Works

The TEI scope of works undertaken were as follows:

- provision of a sampling plan showing proposed sampling locations
- provision of a Safe Work Method Statement
- undertake a 'Dial Before You Dig' search and location of underground services using a service locator
- drilling of a total of sixteen (16) targeted soil investigation boreholes to at least 0.5 metres into natural soil or refusal



- collection of soil samples at each borehole from fill, disturbed, or visually impacted layers as well as natural soil
- detailed logging of each borehole by an experienced scientist including description of soil texture, colour, inclusions, moisture, odour and signs of contamination
- purging and sampling of seven (7) existing groundwater monitoring wells using a peristaltic pump and disposable Teflon tubing
- measurement of field groundwater parameters (temperature, electrical conductivity, pH, redox state and dissolved oxygen until the parameters stabilised
- drilling of a total of seven (7) targeted soil vapour wells to approximately 1 metre below ground level (mbgl)
- purging and sampling of seven (7) soil vapour wells using laboratory certified SUMMA canisters and flow control devices
- field works and sampling in line with KPMG SGA's standard quality assurance procedures including the collection and analysis of duplicate samples for quality control purposes
- laboratory analysis of selected samples at a NATA accredited laboratory for COCs including heavy metals, total recoverable hydrocarbons (TRH), benzene, toluene, ethyl benzene and xylene (collectively known as BTEX), polycyclic aromatic hydrocarbons (PAHs), phenols, and volatile organic compounds (VOCs)
- provision of an TEI report detailing the findings of the field investigation and the
  evaluation of laboratory results with reference to the current of National
  Environment Protection Council (NEPC) (1999) National Environment Protection
  (Assessment of Site Contamination) Measure 1999 (Amended 2013) (NEPM ASC)
  (Reference 7) and state-based legislation and guidelines.





# 3 Site Location and Description

The site is located at 54-68 Ferndell Street, South Granville, NSW as depicted in Figure 1.

The details are summarised in the Table 2 below:

**Table 2 Summary of Site Location and Description** 

Item	Details
Address	54-68 Ferndell Street, South Granville, NSW
Land Identifier	Lot 50 on DP816718
Total Site Area	Approximately 100,327 m <sup>2</sup>
Local Government Authority	Cumberland Council
Site Location Map	Figure 1
Sample Locations	Figure 2

#### 3.1 Environmental Setting

The geology underlying the site, as described in the Geological Survey NSW (1983) – Sydney 1:100,000 Geological Sheet, consists of Triassic aged Ashfield Shale which is part of the Wianamatta Group. This geological unit is described as shale, carbonaceous claystone, laminate, fine to medium grained lithic sandstone with rare coal.

The Australian Soil Resource Information System describes the soil on the site as falling within the sodosol soil order, using the Australian Soil Classification System. Sodosols are soils with strong texture contrast between A horizons and sodic B horizons which are not strongly acid. Generally Sodosols are considered to have low permeability.

Previous environmental investigations have described the site geology as consisting of shallow to moderately deep red and brown Podzolic soils on crests, upper slopes and well drained areas, with deep yellow Podzolic soils and Soloths on lower slopes and in areas of poor drainage (Blacktown Grouping). The eastern part of the site may potentially be located within developed terrain (Department of Land and Water Conservation, 1:100,000 Soil Landscape Series Sheet 9130, Sydney, 1989).

Bore logs from previous investigations suggest that the soils are typically described as orange-grey clays with a medium to high plasticity and minor gravel inclusions to a depth of approximately 3 metres below ground level (mbgl) where weathered shale and clay was encountered between 3 mgbl to 7 mbgl with a shale bedrock starting at 7 mbgl. The previous soil descriptions are comparable to the field observation made by KPMG SGA on the 20 to 22 of June 2017.

A review of the ASRIS Coastal Acid Sulphate Soil Risk Map has identified that the site is located over an area with a low probability of occurrence of acid sulfate soils. Review of the Parramatta City Council Local Environmental Plan revealed that is



located within a Class 5 area of land, indicating that acid sulfate soils are not expected to affect the proposed development at the site.

The hydrogeology of the area has been based on the previous groundwater monitoring investigations (Reference 9 and KPMG SGA, 2016, Review of Environmental Risk – 54 Ferndell St, South Granville, NSW [Reference 16]) which have identified an upper and lower aquifer beneath the site. The upper aquifer was located within the fill materials while the lower aquifer was located within the shale bedrock. The standing groundwater level for the deeper aquifer is depths ranging from 2 to 3 mbgl. A groundwater elevation contour map was developed by URS (Reference 9), which showed an inferred flow direction towards the east north east. On the 28 and 29 June, KPMG SGA observed the standing water level to be between 2.7 mbgl and and 4.5 mbgl, (refer to Section 6.4.2).

Based on the soil and geological review, the site is in an area located over relatively impermeable clays, overlying potentially fractured shale bedrock. The depth to groundwater is approximately 5 mbgl in a semi confined aquifer. Based upon this information, the potential migration of COCs within this geological system is considered to be moderate.



## 4 Data Quality Objectives

Development of data quality objectives (DQOs) for each project is a requirement of NEPM ASC. This is based on a DQO process formulated by the United States Environmental Protection Agency (US EPA) for contaminated land assessment and remediation. The method provides sound guidance for a consistent approach in understanding site assessment and remediation.

The DQO process has seven steps. Each of these steps has been given due consideration in the undertaking of this project. In brief, these steps are:

- Step 1: State the problem and establish the DQO team.
- Step 2: Determine the possible and probable actions that will resolve the problems.
- Step 3: Identify the informational inputs to assist in the problem resolution.
- Step 4: Define the boundaries of the study (geographical, temporal, etc.).
- Step 5: Develop and define decision rules.
- Step 6: Specify tolerable limits to reduce probability of incorrect decisions.
- Step 7: Ensure the quality of the information obtained.

#### Step 1 — State the Problem

Grand Sasanqua is in the process of submitting a DA for the proposed JEG commercial/industrial development at the site and have been requested by the Cumberland Council to include a 'Contamination Report'.

Previous investigations and the KPMG PSI have identified soil and groundwater contamination at the Site. This investigation is designed to address the following data gaps in the conceptual site model:

- Assess the presence and nature of volatile organic compounds within soil vapour beneath the central portion of site associated with the known chlorinated benzene groundwater plume, with consideration for the DA's commercial and industrial use
- Assess the presence and nature COCs within soil beneath the central dock area,
   Dangerous Goods depots 5 and 6 and areas of former USTs with consideration for the DA's commercial and industrial use

#### Step 2 — Identify the Decision

The principal decisions to be made were:

- What were the nominated COCs potentially present within soil, vapour, and groundwater beneath the site?
- What were the suitable human health and ecological criteria for the prosed industrial commercial land use?
- What were the concentrations of these COCs within the within soil, vapour, and groundwater?
- Were concentrations of the nominated COCs within soil and groundwater above the site criteria when evaluated using the nominated decision rules?



- Is the site suitable for proposed commercial/industrial land use and the JEG development from the perspective of protection of human health and the environment?
- If not suitable for current or proposed land use, what further works are required to further assess suitability or make the site suitable?

#### Step 3 — Identify the Inputs to the Decision

The study inputs comprised existing information and information collected during the site inspection. These included:

- review of site characteristics
- observations made during the field investigation
- soil, soil vapour and groundwater laboratory analysis using NATA accredited methods
- consideration of soil, soil vapour and groundwater laboratory results with reference to relevant guidelines.

#### Step 4 — Define the Study Boundaries

The temporal period of the study was limited to site conditions at the time of the fieldwork (20 to 29 June 2017).

The scope of the study is limited to that described in Section 2.3. The physical boundary of the study area is defined in Section 3 and shown on Figure 2.

Practical constraints to the collection of data include:

- the availability of information contained within the previous environmental investigations
- the physical constraints posed by such factors as buildings, site structures, and large vegetation that may affect site access during the inspection
- the financial budget approved by the client.

The nominated COCs for soil, soil vapour, and groundwater were based on a range of COCs potentially associated with the historical use of the site for pharmaceutical manufacturing. The following groups of primary COCs had been derived from the PSI CSM as shown in Table 3.





#### **Table 3 Summary of Contaminants of Concern**

Location / Source	coc
Deeper semi confined shale groundwater plume within centre of the site in vicinity of BRW2.	Groundwater Chlorinated benzenes (1,2-Dichlorobenzene, 1,3-Dichlorobenzene and
OI BITTOVE.	1,4-Dichlorobenzene)
	Soil Vapour
	VOCs
Soil from the former USTs in the vicinity of the former chemical building, central loading dock, admininstration building and former Lan-O-Leen building.	Soil Hydrocarbons BTEX VOCs Lead
Central Dock and Dangerous Goods Depot 5 and 6	Soil Hydrocarbons VOCs

#### Step 5 — Develop and Define Decision Rules

Under the DQO process, it is important to nominate action levels for decision making.

In order to make a correct decision, the input laboratory data obtained needs to be confirmed to be suitable. Acceptable limits for field data analysis (relative percent differences (RPDs) for primary and duplicate results) were less than 50 percent, however a range of up to 150% can be acceptable (depending on the origin of the sample and volatility of the chemicals present). Acceptable limits for laboratory duplicate analysis were set based on site specific information such as background concentrations. These are summarised in as the measurement data quality indicators (MDQIs) (as shown in Table 4) Measurement Data Quality Objectives, which were used to establish whether the DQOs have been met.

It should be noted that NEPM ASC references Standards Australia AS 4482.1 (Reference 1), specifies MDQIs for precision should be ≤50% RPD. However, they also acknowledge that low concentrations and organic compounds in particular, can be acceptably outside this range. AS 4482.1 suggests that ≤50% RPD be used as a 'trigger' and values above this level of repeatability need to be noted and explained.

Note, due to the small scope of this investigation, no inter laboratory duplicates, rinsate blanks or trip blanks were assessed.





#### **Table 4 Measurement Data Quality Objectives**

Parameters	Procedure	Minimum Frequency	>5<10 x LOR4	>10 x LOR
Precision (Repeatability)	Field Duplicates	1 in 20 (for metals and semi volatiles)	<80-100 RPD	<50-80 RPD
	Field Duplicates	1 in 20 (volatiles)	<150 RPD	<130 RPD
	Lab Replicate	1 in 20	<50 RPD	<30 RPD
Accuracy	Reference Material	1 in 10	60% to 140% R	80% to 120% R
	Matrix spikes	1 in 10	60% to 140% R	80% to 120% R
	Surrogate spikes	1 in 10	60% to 140% R	80% to 120% R
Representativeness	Reagent Blanks	1 per batch	No detection	No detection
	Holding Times	Every sample		
Blanks	Trip Blank	1 per batch	No detection	No detection
	Rinsate Blanks	1 per batch	No detection	No detection
Sensitivity	Limit of Reporting	Every sample	2 x LOR	< investigation criteria

#### Note(s):

- 1. RPD relative percentage difference
- 2. % R percent recovery
- 3. LOR limit of reporting
- 4. no limit at <5x LOR
- 5. the MDQI is usually specified in the standard method. If not, use the default values set out in this table

Once the laboratory data for the COC had been deemed suitable for use, based on the MDQIs, the following decision rules were used to make an assessment if concentrations of COCs were acceptable levels from a human health and ecological risk perspective.

The decision rules for soil (where there is considered to be sufficient data):

- the 95% upper confidence level (UCL) of the mean of the COC must be below the nominated investigation level
- the mean concentration of the COCs must be below the nominated investigation level
- no single sample concentration can exceed 250% of the nominated investigation level
- the standard deviation of the COC population must be below 50% of the investigation level.
- The nominated investigation levels are discussed in Section 5.

As such, if statistical analysis of concentrations of individual COCs are in agreement with the decision rule then concentrations of COCs onsite were considered to be below the investigation criteria. If the contrary occurs, then further investigation, remediation or risk assessment may be warranted.



Statistical analysis will only be warranted when elevated concentrations of COCs are detected and analysis is considered likely to provide evidence that the concentrations are not statistically significant.

#### Step 6 — Specify Tolerable Limits on Decision Errors

There are two types of decision errors. If one assumes that the site is impacted by COCs (the null hypothesis):

a) deciding that the site is not impacted when it actually is (Type I error). The consequence of this error may be unacceptable ecological or health risk for future users of the site

b) deciding that the site is impacted when it is not (Type II error). The consequence of this error is that the client or a future potential owner will pay for further investigation / remediation that is not necessary

If the null hypothesis position that the site is impacted is adopted, the estimation of a 95% UCL will reduce the occurrence of decision error (a) errors to 5%.

#### Step 7 — Optimise the Design

During the DQO process the sampling design was optimised through several iterations. Optimisation of the design included evaluating Steps 1 - 6 of the DQO process. The following are the key steps taken to optimise the sample design:

- sampling design based on area coverage, available information on infrastructure and soil/fill conditions within the investigation area
- revisions of sampling locations on site prior to fieldworks taking into account access constraints, location of underground services, infrastructure and work health and safety considerations
- adjustment of sample analysis plan based on field observations and soil samples collected.

The final field program and sampling pattern was considered optimal taking into account the purpose of the investigation, access constraints, budget and temporal limitations. A detailed discussion on the sampling program is presented in Section 6.



# 5 Investigation Criteria

The following sections outline the investigation assessment criteria for soil, groundwater and soil vapour adopted during the TEI.

#### 5.1 Investigation Assessment Criteria

The National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPM 1999) is made under the National Environment Protection Council Act 1994 and was developed to establish a nationally consistent approach to the assessment of site contamination to ensure sound environmental management practices by the community which includes regulators, site assessors, environmental auditors, landowners, developers and industry. The NEPM 1999 was amended on 16 May 2013, with subsequent national implementation, and is referred to within this report as NEPM ASC.

The NEPM ASC Schedule B1 – Guideline on Investigation Levels for Soil and Groundwater provides a framework for the use of investigation and screening levels for soil, soil gas and groundwater. The framework is based on a matrix of human health, ecological and groundwater investigation and screening levels in conjunction with guidance for specific COCs. The investigation levels and screening levels presented in the NEPM ASC are the concentrations of a COC above which further appropriate investigation and evaluation would be required.

The guidelines included:

- **Ecological Investigation Levels (ElLs)** for selected metal and organic substances and are applicable for assessing risk to terrestrial ecosystems.
- Ecological Screening Levels (ESLs) for BTEX, total petroleum hydrocarbon (TPH) and benzo(a)pyrene compounds and are applicable for assessing risk to terrestrial ecosystems.
- **Groundwater Investigation Levels (GILs)** for a broad range of metal and organic substances. The GILs are the concentrations of a COC in groundwater above which further investigation (point of extraction) or a response (point of use) is required. GILs are based on Australian Water Quality guidelines and drinking water guidelines and are applicable for assessing human health risk and ecological risk from direct contact (including consumption) with groundwater
- **Health Investigation Levels (HILs)** for a broad range of metal and organic substances. The HILs are applicable for assessing human health risk via all relevant pathways of exposure.
- Health Screening Levels (HSLs) for BTEX, TRH and naphthalene compounds and are applicable to assessing human health risk via the inhalation and direct contact pathways.
- Petroleum Hydrocarbon Management Limits (Management Limits) are applicable to TPH compounds only. They are applicable as screening levels following evaluation of human health and ecological risks and risks to groundwater resources. They are relevant for operating sites where significant sub-surface





leakage of TPH compounds has occurred and when decommissioning industrial and commercial sites. The Management Limits are only applied where applicable.

• Interim Soil Vapour Health Investigation Levels (Interim HILs) - for selected volatile organic chlorinated compounds (VOCCs) and are applicable to assessing human health risk by the inhalational pathway

#### 5.2 Derivation of Assessment Criteria

Application of these investigation and screening levels form the basis of a Tier 1 risk assessment. If concentrations are found to exceed the applicable investigation levels, further investigations and a site specific risk assessment may be necessary.

#### 5.2.1 Soil Criteria

The current and intended future use of the Site is commercial/industrial. In addition, commercial/industrial land uses are present in the majority of the surrounding areas, particularly in the inferred down-gradient direction from the Site.

#### **Health Investigation Levels (HILs)**

A single set of health investigation level (HIL) values is presented in the NEPM 1999 (2013 amendment). KPMG has adopted HIL-D values for a commercial and industrial land use.

#### **Health Screening Levels (HSLs)**

As the main soil type for this site is clay, HSL-D with clay soil for a commercial and industrial land therefore been adopted to assess for vapour intrusion from soils.

#### **Ecological Screening Levels (ESLs)**

The ESLs for a commercial/industrial land use are considered most appropriate and have been selected.

#### **Ecological Investigation Levels (EILs)**

In applying the EILs for specific heavy metals, the Ambient Background Concentration (ABC) were calculated and appropriate Added Contaminant Limits (ACL) chosen based on physiochemical soil characteristics including soil pH and cation exchange capacity (CEC). For the purposes of this investigation, soil pH and CEC were based on sample results collected from the material on site. The EILs were calculated using the NEPC EIL - Interactive Calculation Spreadsheet.

#### 5.2.2 Groundwater Criteria

The groundwater investigation levels adopted include the ANZECC 2000 Investigation levels for freshwater aquatic ecosystems (Duck Creek nearest sensitive receptor) and the Australian Drinking Water guidelines. It should be noted that due to the highly disturbed nature and commercial/industrial use of the site (and surrounding sites) the potential for groundwater on the site to be utilised for drinking water purposes is considered to be minimal. The investigation will therefore prioritise assessment against the freshwater aquatic ecosystem investigation levels. For chlorobenzene the ANZECC 2000 GILs only provide guidelines which are described as low reliability criteria. These guidelines have been formulated from limited studies into the potential adverse effects of the particular COC and therefore they are considered low reliability.





The low reliability guideline for chlorobenzene is 55 µg/L, this guideline was adopted by URS in the annual monitoring, however the drinking water guideline for chlorobenzene is 300 µg/L, therefore KPMG SGA have in this instance referred to both the low reliability guideline level of 55 µg/L and the drinking water guideline level of 300 µg/L.

The HSLs have been developed for groundwater at 2 to <4 mbgl. While unlikely following the proposed development works it possible that the groundwater may be shallower than this. It is also noted that groundwater HSLs are not available for VOCs.

#### 5.2.3 Soil Vapour Criteria

The investigation is intended to provide guidance on potential risks to future site occupants by via vapour intrusion of VOCs. Interim HILs for selected volatile organic chlorinated compounds (VOCCs) and HSLs for petroleum hydrocarbon vapours were adopted. There are no interim HILs for chlorinated benzenes. The tier one vapour criteria for chlorinated benzenes was calculated using the NEPM HIL calculator.

The following Toxicity Reference Value Inhalation (TRVI) (mg/m<sup>3</sup>) were inputted into the NEMP HIL calculator (Reference 7)):

- Chlorobenzene 0.05 mg/kg/per day (US EPA Provisional Peer Review Toxicity Values) [Reference 11])
- 1,2 Dichlorobenzene 0.2 mg/kg/per day (US EPA Superfund Health Effects Assessment Summary Tables [Reference 12])
- 1,4 Dichlorobenzene 0.8 mg/kg/per day (US EPA Integrated Risk Information Systems [Reference 13])

Using the above values, the derived Tier one screening HIL criteria for chlorinated benzenes are:

- Chlorobenzene 2,100 µg/m<sup>3</sup>
- 1,2 Dichlorobenzene 9,100 μg/m³
- 1,4 Dichlorobenzene 33,000 μg/m³



# 6 Field Investigation

#### 6.1 Sampling Analysis Plan and Methodology

A dial before you dig (DBYD) plans were obtained and reviewed to identify the entry points of underground services onto the Site. A service contractor (Durkin) was engaged to identify underground services that may be present beneath the selected locations. A service wand and ground penetrating radar was used.

#### 6.1.1 Soil Investigation

The soil intrusive investigation included sixteen (16) targeted borehole (BH) locations across the site, as shown in Figure 2. BH1 to BH16 were drilled using the push tube method to 0.5 metres into natural material or refusal. The boreholes depths were drilled between 2.2 - 3.5 mbgl.

The key potential sources of COCs considered the historical industrial site use. Sampling locations were designed to target historical potentially contaminating areas identified in the PSI (reference 6). The soil sampling locations are shown on Figure 2.

The laboratory analysis schedule for samples was determined in consideration of these potential sources. The COCs are listed in Section 4.

#### 6.1.2 Soil Sampling Methodology

A total of 71 primary soil samples were collected directly from push tubes liners. Each soil sample was collected with disposable nitrile gloves and placed into laboratory provided glass jars with Teflon lids and minimal headspace. Headspace vapour was assessed by using a photoionisation detector (PID) and recorded on the borehole logs. Each sample container was clearly labelled with the project number, sample location and date of sample collection using a waterproof marker. Upon collection, samples were immediately placed into a chilled cooler for storage and later transport to the laboratory.

#### 6.1.3 Groundwater Investigation

Seven existing groundwater wells were sampled, as shown on Figure 2. BRW1A was not located due to demolition works and was not sampled.

#### 6.1.4 Groundwater Sampling Methodology

The following groundwater well sampling procedure was undertaken:

- Prior to sampling, standing water levels (SWL) were measured.
- Wells were sampled and purged using a minimal drawdown technique, where the standing water levels were monitored and the pumping rate altered so the well screen was not dewatered. A peristaltic pump was used for the groundwater sampling. This is considered appropriate due to the shallow depth to groundwater, which was considered unlikely to have resulted in significant lifting pressure and degassing of VOCs. Dedicated tubing for each sampling location was used to minimise the potential for cross contamination. Monitoring of chemical





characteristics with a calibrated groundwater multi parameter water meter was undertaken to confirm samples were representative of formation water. Groundwater wells were sampled once the chemical characteristics stabilised as follows:

- o ± 10 % for dissolved oxygen (DO)
- o ± 3% for electrical conductivity (EC)
- $o \pm 0.05$  pH units
- o 10 mV oxidation reduction potential (ORP).
- Samples were collected in laboratory supplied bottles. Inline field filtering (0.45 um) and acid preservation was undertaken for metals analysis samples.
- Upon collection, samples were placed immediately into ice filled coolers for storage and transport to the laboratory.

#### 6.1.5 Soil Vapour Investigation

The soil vapour works were undertaken on 28 July 2016. The following procedures were undertaken onsite:

- Installation of soil vapour ports (constructed of 152mm stainless steel screens connected to the surface via Teflon tubing) in selected locations and depths around the BRW2 plume area.
- Purging of soil vapour ports using a 6L certified Silcosteel Summa Canister
- Collection of vapour samples from soil vapour ports using 1 litre certified Silcosteel SUMA Canister equipped with calibrated and leak checked flow restrictors
- Sampling equipment was held within a plastic chamber during sampling and an isopropyl alcohol soaked rag was placed in the vicinity of all soil vapour ports to assess the potential of leakage from the vapour ports or Suma canister connections

The laboratory analysis schedule for samples was determined in consideration of these potential sources. The COCs are listed in Section 4.

#### 6.1.6 Soil Vapour Sampling Methodology

Vapour ports were installed by initially hand auguring to the target depth. Refer to Table 6 for soil vapour port depths. Vapour screens were then inserted to the base depth of the borehole and 2-4 mm graded sand was placed around and above the screened port. Powdered and pellet bentonite was placed in three contiguous layers to the surface and hydrated slowly to ensure water did not infiltrate the sand pack or vapour screen. Prior to sampling, each vapour port was left to equilibrate for approximately 1 hour period and then purged approximately 3.5 x the sample train and sand screen volume using a laboratory provided summa canister.

Prior to sampling a stop test was performed to assess airtight integrity of the sample train. In the event that the sample train did not maintain a negative pressure (indicative of a leak) the connections were re-checked and the stop test was conducted again. Sample collection did not begin until the sample train was deemed to be airtight.

Sampling was undertaken using laboratory provided vapour canisters, regulators and sample tubing. A volatile isopropyl alcohol source was placed within the shroud, in close proximity to the canister/vapour port during sampling to assess the integrity of







the bentonite slab seals installed during vapour port construction and connection seals between canisters, regulators and the sampling tubes. Soil vapour port sampling was undertaken over a 1 hour sampling period.

The summa canisters pressure was noted before and after sampling for comparison with reading collected by envirolab before shipping and analysis.

A duel canister manifold was used at sample VS-7 to collect a duplicate, blind replicate sample.

Each sample canister was clearly labelled with the project number, sample location and date of sample collection using individually assigned labels. Once collected, all samples were carefully wrapped and stored for transportation to the laboratory.

#### 6.2 Rationale for Sampling Pattern Selection

A sampling pattern was developed based on the PSI and through the DQO process. The rationale of the TEI sampling pattern for soil, soil vapour and groundwater is summarised in the Table 5 below. The positions of the sampling locations are shown on Figure 2.

**Table 5 Rational for Sample Pattern Selection** 

Sample ID	Location	Justification
BH01 to BH04	Dock 5 finished goods warehouse & distribution centre	Previously not investigated due to concerns with services and concrete slab thickness.  Potential contamination from historical site use and proximity to the former loading dock USTs and Dangerous Goods warehouse.  The four boreholes and collection of samples has characterise
		the potential COC under the building.
BH05 and BH06	Former USTs in the loading dock between Dock 2	USTs removed in 1988. There are no historical reports discussing the condition of the soil. Previously not investigated due to concerns with services and concrete slab thickness.
	and Dock 5	Potential COC associated with historical USTs has been characterised by the two boreholes.
BH07, BH08, BH10	Former depot 5 & 6 Dangerous Goods warehouse	Previously investigated had not adequately characterised the potential COC. The three boreholes and collection of samples has characterised the potential COC under the building.
BH09 and BH11	The Former AST south of the medical building	Previously investigated had not adequately characterised the potential contamination. The two boreholes and collection of samples has characterised the potential COC associated with AST building.
BH12 to BH16	The Lan-O-Leen Building with former solvent USTs	USTs have been removed. There are no historical reports discussing the condition of the soil post removal. Only one previous borehole location has been identified for this area from a Dames & Moore 2014, Preliminary Contamination Assessment.
		The drilling of the four additional boreholes and collection of samples has characterise the potential COC associated with former USTs.
BRW2, BRW3, BRW4, BRW5, BRW7, BRW9 and	BRW2, BRW3, BRW4, BRW5, BRW7, BRW9 and PH12	Central area of the site and north east of the site





VS1- VS-7	Central area of the site	KPMG in 2016 had conducted a preliminary soil vapour screening with three soil vapour wells. The soil vapour concentrations were below the adopted criteria. The concentrations of chlorinated benenze in the groundwater warranted additional investigation with increase sample location and under a second time frame to
		observe temporal effects (if any).

#### 6.3 Laboratory Analysis

The following laboratory analysis was undertaken by Envirolab, as shown in Table 6, using NATA accredited methods. The analytes selected are based on the COCs for the site.

Table 6 Soil, Water and Soil Vapour analytical schedule

Analytes	Soil Samples	Number of Duplicates	Water Samples	Number of Duplicates	Vapour Samples	Number of Duplicates
Petroleum hydrocarbons/ BTEXN	33	2	7	1	7	1
Polycyclic Aromatic Hydrocarbons (PAHs)	33	2	7	1		
Heavy Metals	33	2	7	1	-	THE STATE OF
Phenols	7	0	201	120	¥	-
Volatile Organic Compounds	18	0	7	0		F:
Chlorinated Compounds		*	(8)	±.	7	1
pH and CEC	3	0	383			

#### 6.3.1 Quality Assurance

The quality assurance and quality control procedures undertaken as part of this project are outlined in Appendix E of this report and procedures are referenced in NEPM ASC (Reference 7). Field procedures were designed to prevent/minimisation cross-contamination, analyte loss and to ensure samples and results were representative of actual conditions.

Five (5) soil field duplicate samples were collected with two (2) intra laboratory samples analysed. One (1) groundwater and one (1) soil vapour field duplicate sample was collected and analysed. The results of the duplicate samples were compared to those of the primary sample as a measure of method precision.

A soil vapour leak detection test was performed using isopropanol (IPA) as leak detection tracer. The detected IPA concentration was within acceptable limits and a results table is reported in Appendix E.

The soil vapour canister pressure before shipment was within 1 Hg to that observed by the field scientist, prior to sampling. The final field canister pressure measurement





compared to pressure prior to analysis was within 1 Hg, indicating that the integrity of the canisters was maintained during transport to and from site.

A detailed discussion on quality procedures and results for this investigation is presented in Appendix E. In general, the quality of the data set was considered to be reliable and acceptable.

#### 6.4 Fieldwork Observations

The intrusive field works were undertaken from 20 and 29 June 2017. The following sections outline the fieldwork observations for soil, groundwater and vapour.

#### 6.4.1 Soil Observations

The boreholes depths were drilled between 2.2 mbgl to 3.5 mbgl. Refusal was encountered at five attempted locations for the two boreholes around the former USTs at the loading dock and Dock 5 finished goods warehouse & distribution centre. The two boreholes could not be drilled elsewhere due to a stormwater channel and a sub slab void running beneath the building. In addition, sub-surface concrete was encountered below the floor concrete slab, causing refusal.

In general, the soil stratigraphy at the site (BH01 to BH16) can be summarised as:

- Concrete was present from 0.0 0.15 mbgl at BH01 to BH06 and BH10. Asphalt was present from 0.0 - 0.1 mbgl at BH12 to BH16.
- Fill material generally consisting of brown sand and gravel was generally observed to 0.5 mbgl.
- Reworked brown, red, orange and grey clay with gravel with sand lenses were observed to depths of 1.0 - 2.5 mbgl.
- Natural material consisting of grey with orange, yellow or red mottling clay, which was firm and a high plasticity.

Possible black staining was observed in a number bores within the reworked clay material. No further visual evidence of contamination or odours were observed. The PID concentrations were generally less than 10 ppm. BH02 recorded the highest PID concentration of 42.5 ppm.

Borehole locations are presented on Figure 2 and borehole logs are presented in Appendix C.

#### 6.4.2 Groundwater Observations

The following groundwater field measurements were taken during the investigation, as presented in Table 7.

Table 7 Groundwater field chemical characteristics

ID	SWL* (mbgl)*	Temp (°C)	ORP (mV)	pH (units)	DO (%)	EC (ms/cm)	Comments
BRW2	3.002	23.1	-91	6.69	-4.5	21.8	Clear, no odour
BRW3	2.712	23.0	-132	6.87	-3.4	25.4	Clear with an slight organic odour





BRW4	3.350	22.2	-183	6.91	-2.9	29.2	Clear with an slight organic odour
BRW5	3.344	21.7	19	6.91	-3.3	18.95	Clear, no odour
BRW7	4.486	21.0	-21	7.03	2.3	18.16	Clear, no odour
BRW9	4.542	20.02	-136	7.21	18.57	14.82	Clear, no odour
PH12	4.054	21.4	-248	6.98	-3.0	21.7	Clear, no odour

#### Note(s):

1. SWL – standing water level measured prior to the collection of the groundwater samples

#### 6.4.3 Soil Vapour Observations

The following is a summary of soil vapour port depth and observations, as presented in Table 8.

**Table 8 Summary of Soil Vapour Ports Depths and Observations** 

ID	Depth (mbgl)	Comments / Contamination Observations
VS-1	0.85	No visual contamination or odour observed.
VS-2	0.85	No visual contamination of odour observed,
VS-3	0.7	Firm clay refusal at 0.7 mbgl. No visual contamination or odour observed.
VS-4	0.95	Asbestos cement debris encountered at 0.45 mbgl. No visual contamination or odour observed.
VS-5	0.95	No visual contamination or odour observed.
VS-6	1.05	No visual contamination or odour observed.
VS-7	0.75	No visual contamination or odour observed.



# 7 Laboratory Results

#### 7.1 Soil

A summary of the soil laboratory results are presented in Tables 1 to 4 at the end of the report. A full copy of the laboratory analysis certificates are presented in Appendix D.

Concentrations of all COCs were identified below the laboratory limit of reporting or below the adopted criteria.

#### 7.2 Groundwater

A summary of the groundwater laboratory results are presented in Table 5 at the end of the report. A full copy of the laboratory analysis transcripts are presented in Appendix D.

The following COCs within samples analysed were identified to be above the relevant criteria:

- The concentration of arsenic within sample BRW9 (24 μg/L) was above the adopted freshwater GIL and drinking water GIL of 13 μg/L and 10 μg/L respectively.
- The concentration of benzene within sample BRW2 (4 μg/L) was above the adopted drinking water GIL of 1 μg/L.
- The concentration of chlorobenzene within sample BRW2 (39  $\mu$ g/L) was above the adopted drinking water GIL 10  $\mu$ g/L.
- The concentration of 1,4 Dichlorobenzene within sample BRW2 (270  $\mu$ g/L) was above the adopted freshwater GIL and drinking water GIL of 60  $\mu$ g/L and 40  $\mu$ g/L respectively.
- The concentration of 1,2 Dichlorobenzene within sample BRW2 (6,200 μg/L) was above the adopted freshwater GIL and drinking water GIL of 160 μg/L and 1,500 μg/L respectively.

#### 7.3 Soil Vapour

A summary of the soil vapour laboratory results are presented in Table 6 at the end of the report. A full copy of the laboratory analysis certificates are presented in Appendix D.

Concentrations of all COCs were identified below the laboratory limit of reporting or below the adopted criteria.





# 8 Discussion and Conceptual Site Model

The following sections discuss the findings of the TEI works, including: the soil, groundwater and soil vapour results and provide a revision to the conseptual site model (CSM).

#### 8.1 Soil

Soil results for the TEI were below the adopted criteria for each borehole. Therefore soil contamination was not identified at the following historical areas:

- The former USTs in the loading dock between Dock 2 and Dock 5 (BH05 and BH06)
- The Dock 5 finished goods warehouse & distribution centre (BH01 to BH04)
- Depot 5 & 6 Dangerous goods warehouse (BH07, BH08 and BH10)
- The Former AST south of the medical building (BH09 and BH11)
- The Lan-O-Leen Building with former solvent USTs (BH12 to BH16)

The soil is suitable to remain on the site for commercial / industrial land use. If soil is to be removed from site, a waste classification will be required from a suitability qualified consultant for disposal at a licensed landfill facility. Asbestos cement debris was identified within vapour borehole VS-4. Any future excavation in this area should adopt appropriate workplace health and safety (WHS) protocols.

#### 8.2 Groundwater

Groundwater sampling was indicated concentrations were in excess of the adopted criteria at BRW2 and BRW9. The following section discusses the exceeding results.

#### 8.2.1 Groundwater VOCs

Groundwater VOC results for the TEI were generally below the adopted criteria with exception of benzene, chlorobenzene, 1,2 dichlorobenzene and 1,4 dichlorobenzene concentrations above the adopted criteria at BRW2. The historical URS groundwater monitoring reports have previously reported elevated concentrations of these exceeding analysts at BRW2.

The plume of benzene, chlorobenzene, 1,2 dichlorobenzene, 1,4 dichlorobenzene around BRW2 does appears to be stable both from a chemical and hydrogeological perspective and is not migrating down gradient or offsite, with no detections of VOCs at BRW3. The existing monitoring wells should be protected under the proposed building works. If the wells BRW2, BRW3, BRW4 and BRW5 are to be destroyed they should be adequately decommissioned and reinstalled at the completion of works. Ongoing monitoring of the plume is recommended following the building works, as the proposed works may change the dynamics of the plume, with the installation of footings.





#### 8.2.2 BRW9 Arsenic Result

Arsenic was reported above the adopted criteria in BRW9. These concentrations are slightly above the Freshwater GIL limit. This result is considered to be low risk, with the down gradient monitoring wells BRW5, BRW 7 and PH12 did not record concentration above the adopted criteria. No further action is required to monitor BRW9.

#### 8.3 Soil Vapour

Soil vapour results were below the adopted criteria for each vapour well. The results indicate that the identified elevated concentrations of VOCs in groundwater are not resulting in a vapour intrusion risk in the site's current (undeveloped) state. Furthermore, as the proposed development includes the placement of fill above the identified groundwater impact, and the provision of a hardstand concrete slab for the warehouse, the risk of vapour intrusion into the proposed warehouse is minimal. However, the concentration of VOCs within the groundwater are elevated at concentrations which could potentially result in vapour intrusion risk should a preferential pathway be created such as a building footings or piling.

Currently in Australia there are no published groundwater criteria for chlorinated benzenes which address the potential for vapour intrusion from a groundwater source. The lack of a presence of a guideline for a particular chemical of concern's "source and pathway" does not negate the need for consideration of that relevant chemical of concern.

In order to allow screening level comparisons KPMG SGA has adopted the methodology the USEPA published OSWER Draft Guidance for evaluating the Vapour Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface vapour intrusion guidance) (Reference 14).

While this document is not directly applicable in the site it provides a method for undertaking screening assessment for groundwater source for protection of vapour intrusion, and thus allowing comparison with the NEPM (ASC) interim soil vapour health investigation levels for VOCs.

An approximation of the soil vapour concentration at the groundwater interface may be made by using Henrys Law. For the maximum concentration of 1,2 Dichlorobenzene in (6,200  $\mu$ g/L) the potential maximum vapour concentration at the water / air interface can be calculated as follows.

The Henrys Law Constant (H') for 1,2Dichlorobenzene is 0.54 (dimension less) (US Department of Commerce, National Institute of Standards and Technology, NIST Chemistry WebBook, SRD 69, Seen July 2017, [Reference 15]). 6,200  $\mu$ g/L times 0.54 (rate constant) = 3,348 mg/m³ (with unit conversions). This would be above the adopted vapour criterion of 9,100  $\mu$ g/m³ for the site. However this is a highly conservative number as it does not allow for natural attention of the vapour through the soil profile.

KPMG SGA recommends a construction design that would not cause a preferential vapour pathway to the newly constructed warehouse building. If this not possible, a more detailed risk assessment will be required to assess the appropriate vapour controls. In addition to ensuring that a vapour preferential pathway is not created, KPMG SGA recommend that ambient air testing be conducted prior to occupation of the building to validate that vapour intrusion has not occurred.



# 8.4 Updated Conceptual Site Model

The following Table 9 Conceptual Site Model is an updated version of the PSI conceptual site model.

# **Table 9 Conceptual Site Model**

	Recommended Action	Not Applicable	Manage in accordance with a site specific Construction Environmental Management Plan (CEMP)	Not Applicable	Construction design that would not cause a preferential vapour pathway to the newly constructed warehouse building. Ambient air testing prior to occupation of the building to validate that the COC vapour intrusion is not entering the building	Not Applicable	Not Applicable	Groundwater monitoring required post construction	
	Pathway complete	Unlikely	Unlikely	Untikely	Potential	Unlikely	Unlikely	Unlikely	
	Comments	Potential inhalation of VOCs by future site users. Potential for vapour intrusion risk to proposed warehouse building.	There may be potential for site workers to encounter impacted soils during localised cutting in the area.	Onsite ecological receptors not identified.	Potential inhalation of VOCs by future site users. Potential for vapour intrusion risk to proposed warehouse building in association with the BRW2 plume.	No drinking water utilisation in immediate area	Groundwater not expected to be encountered during development activities.	Groundwater plume is considered to be stable and not affecting offsite ecological receptors (e.g. within Duck Creek) as confirmed by the EPA in 2003 and subsequent groundwater investigations.	
	Exposure Route	Inhalation	Dermal contact / Ingestion	Direct Contact	Inhalation	Drinking	Direct Contact	Direct contact / Ingestion	
	Receptor	Human Ecological Species and		Ecological species and soil microbial processes	Human			Ecological species (offsite)	
	Media		oil/Rock	S	Groundwater				
	202		Chlorinated benzenes						
-	sacurces	Groundwater plume in vicinity of BRW2							



Targeted Environmental Investigation 54-68 Ferndell Street, South Granville, NSW

Grand Sasanqua Pty Ltd 4 August 2017

during earthworks, assess suitability for re-use Should soils from Solomons Hill be excavated Recommended Action Not Applicable Not Applicable Not Applicable Not Applicable Not Applicable on site. complete Pathway Unitionly Unlikely Unlikely Unfinery be minor. In addition, there is currently no building considered that any residual contamination would validation reports have been provided, resulting in workers and future site users may be affected by Spills and leaks from stored chemicals may have the Dangerous Goods depots. These areas have The soils used to build Solomons Hill were noted surrounding soil. There may be potential for site workers to encounter impacted soils during resulted in localised soil impacts in the vicinity of in this area, nor is it expected that the proposed warehouse will affect this area. to have been excavated from the former landfill not previously been investigated. Construction the potential for residual COCs to remain in the areas and remediated prior to placement. It is Although the USTs were removed in 1987, no Onsite ecological receptors not identified. Onsite ecological receptors not identified. Onsite ecological receptors not identified Comments localised cutting in the area. inhalation of vapours. contact / Ingestion Exposure Route contact/ Inhalation Dermal contact / ngestion Ingestion Inhalation Inhalation Direct Contact Direct Contact Dermal Direct Contact Dermal species and soil microbial soil microbial soil microbial species and species and Ecological processes Ecological processes Ecological processes Receptor Human Human Human Media lioS lio2 Soil/Rock Геэд loading lock, admin building, and former Lan-O-Leen building

Hydrocarbons

VOCs

BTEX
Lead 1 AOCs Adrocarbons 200 Chlorinated benzenes Depot 5 and 6 Sources sDangerous Goods lliH emoolo2 Former USTs in the vicinity of the former chemical building, central Central Dock and



Manage in accordance with a site specific Construction Environmental Management Plan (CEMP). If asbestos identified in soil during development works, it may be necessary to manage under an ongoing Environmental Management Plan. Not Applicable Not Applicable Not Applicable Non-volatile chemicals therefore not inhalation not applicable. These soils have previously been disposed offsite. Potential for fill materials to be contain surficial asbestos which may be disturbed during excavation. Onsite ecological receptors not identified. Dermal contact / Ingestion Inhalation Direct Contact Inhalation soil microbial species and processes Ecological Human Human lio2 lio2 sotsedaA Arsenic Eastern end of former Lan-O-Leen building Entire site

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## 9 Conclusion & Recommendations

Based on the findings of the TEI undertaken, KPMG SGA consider that the site is suitable for the proposed JEG commercial/industrial development providing the below recommendations are followed. KPMG SGA form this opinion due to the fact that:

- No COCs were identified above the adopted guidelines in the soil samples collected and analysed.
- No COCs were identified above the adopted guidelines in the soil vapour samples collected.

Concentrations of benzene, chlorobenzene, 1,2 dichlorobenzene, 1,4 dichlorobenzene concentrations were detected above the adopted criteria at groundwater well BRW2. Potential inhalation of VOCs by future site users remains a possibility due to the proposed construction of the warehouse building in association with the BRW2 plume. KPMG SGA recommends the following:

- a construction design that would not cause a preferential vapour pathway to the newly constructed building. If this is not possible a more detailed risk assessment will be required to assess the appropriate vapour controls for the building / warehouse
- ambient air testing prior to occupation of the building to validate that the COC vapour intrusion is not entering the building
- annual groundwater monitoring of wells BRW2, BRW3, BRW4 and BRW5 to assess the trends of the chlorinated benzene plume.

A Construction Environmental Management Plan is recommended to be produced by an environmental consultant to include:

- an unexpected findings protocol specifying how to manage identification of potential contamination (such as asbestos) during the development works
- soil management including separation, stockpiling, testing, classification, and offsite disposal in accordance with NSW Waste Classification guidelines
- groundwater management in the event that groundwater is encountered during the development.







## 10 Limitations

This report has been prepared by KPMG SGA in response to and subject to the following limitations:

- 1. The specific instructions received from Grand Sasangua Pty Ltd.
- 2. The Engagement Letter between KPMG SGA and Grand Sasangua Pty Ltd dated 9 June 2017 including the Scope Limitations and Terms and Conditions of Business contained within.
- 3. The report has been prepared to a specific scope of works as set out in Section 2.3 of this report.
- 4. May not be relied upon by any third party not named in this report for any purpose except with the prior written consent of KPMG SGA (which consent may or may not be given at the discretion of KPMG SGA).
- 5. This report comprises the formal report, documentation sections, tables, figures and appendices as referred to in the index to this report and must not be released to any third party or copied in part without all the material included in this report for any reason.
- 6. The report only relates to the site located at 54-68 Ferndell Street, South Granville, NSW ("the site").
- 7. The report relates to the site as at the date of the inspection as conditions may change thereafter due to natural processes and/or site activities.
- 8. No warranty or guarantee is made in regard to any other use than as specified in the scope of works.



## 11 References

- Australian and New Zealand Environment and Conservation Council/ Agriculture and Resource Management Council of Australia and New Zealand, Guidelines for Fresh and Marine Water Quality, ANZECC/ARMCANZ 2000
- 2. AS4482.1–2005 Guide to the investigation and sampling of sites with potentially contaminated soil, Part 1: non-volatile and semi-volatile compounds. Standards Australia
- 3. AS4482.2–1999 Guide to the sampling and investigation of potentially contaminated soil, Part 2: volatile substances, Standards Australia
- 4. Department of Land and Water Conservation, 1:100,000 Soil Landscape Series Sheet 9130, Sydney, 1989
- 5. Geological Survey NSW (1983) Sydney 1:100,000 Geological Sheet
- 6. KPMG SGA, May 2017, Preliminary Site Investigation, 54 68 Ferndell Street South Granville, NSW (PSI)
- 7. National Environment Protection Council (1999) National Environment Protection (Assessment of Site Contamination) Measure (NEPM) (Amended 2013)
- Safe Work Australia (2013) Workplace Exposure Standards For Airborne Contaminants
- 9. URS (November 2013) Environmental Site Investigation, Merck Sharp and Dohme, South Granville NSW
- URS (January 2014) Round 24 Groundwater Monitoring 2013, 54 -68 Ferndell Street South Granville NSW
- 11. US EPA Provisional Peer Review Toxicity Values
- 12. US EPA Superfund Health Effects Assessment Summary Tables
- 13. US EPA Integrated Risk Information Systems
- 14. USEPA published OSWER Draft Guidance for evaluating the Vapour Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface vapour intrusion guidance) EPA530-D-02-004 November 2002
- 15.US Department of Commerce, National Institute of Standards and Technology, NISTChemistry WebBook, SRD 69 (Seen July 2017)
- 16.KPMG SGA, 2016, Review of Environmental Risk 54 Ferndell St, South Granville, NSW



sga

Targeted Environmental Investigation 54-68 Ferndell Street, South Granville, NSW Grand Sasanqua Pty Ltd 4 August 2017

**SITE FIGURES** 

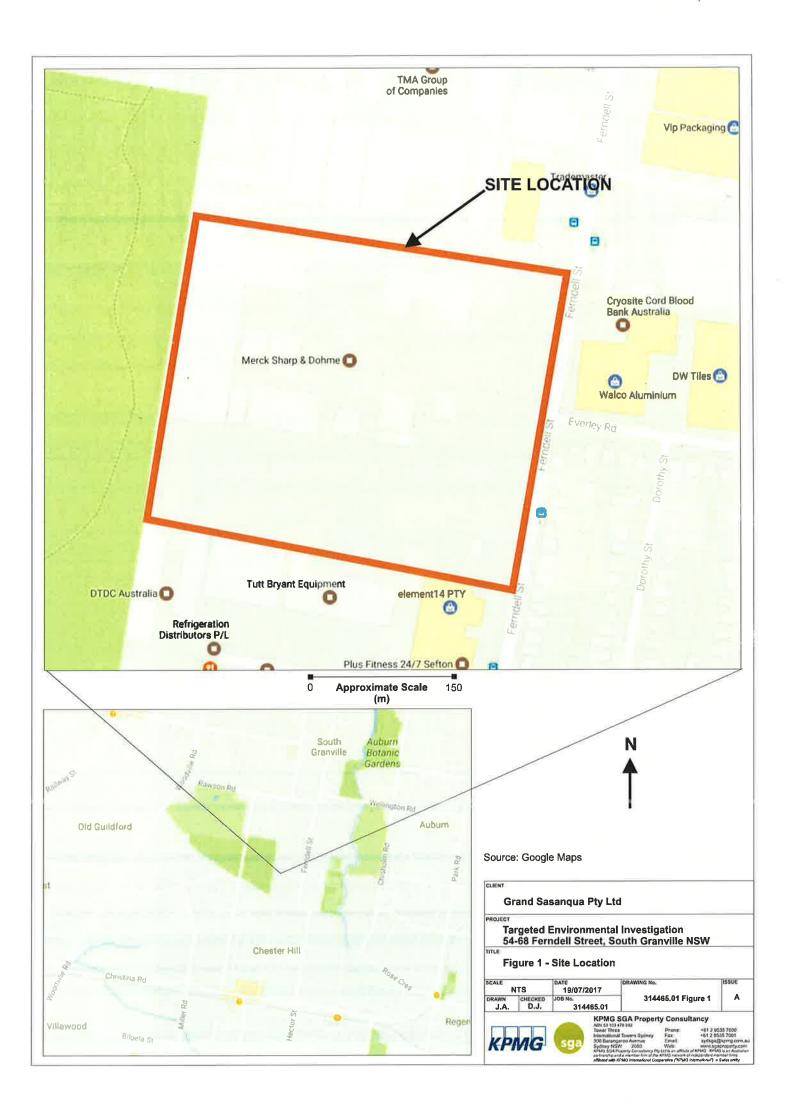




Figure 2 - Sampling Locations Grand Sasanqua Pty Ltd

# **nettleton**tribe



54 - 68 Ferndell street, South Granville nsw 2142

GENERAL 10248 DA-000

COVER SHEET

SITE PLAN MASTER PLAN

FLOOR PLANS 10248\_DA-002 10248\_DA-003 10248 DA-004

MASTER PLAN - FUTURE CARPARK

10248 DA-011

GROUND FLOOR PLAN L1 FLOOR PLAN ROOF PLAN

10248 DA-011 10248 DA-012 10248 DA-013 10248 DA-014 10248 DA-016 10248 DA-017

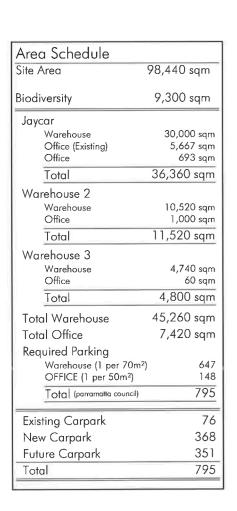
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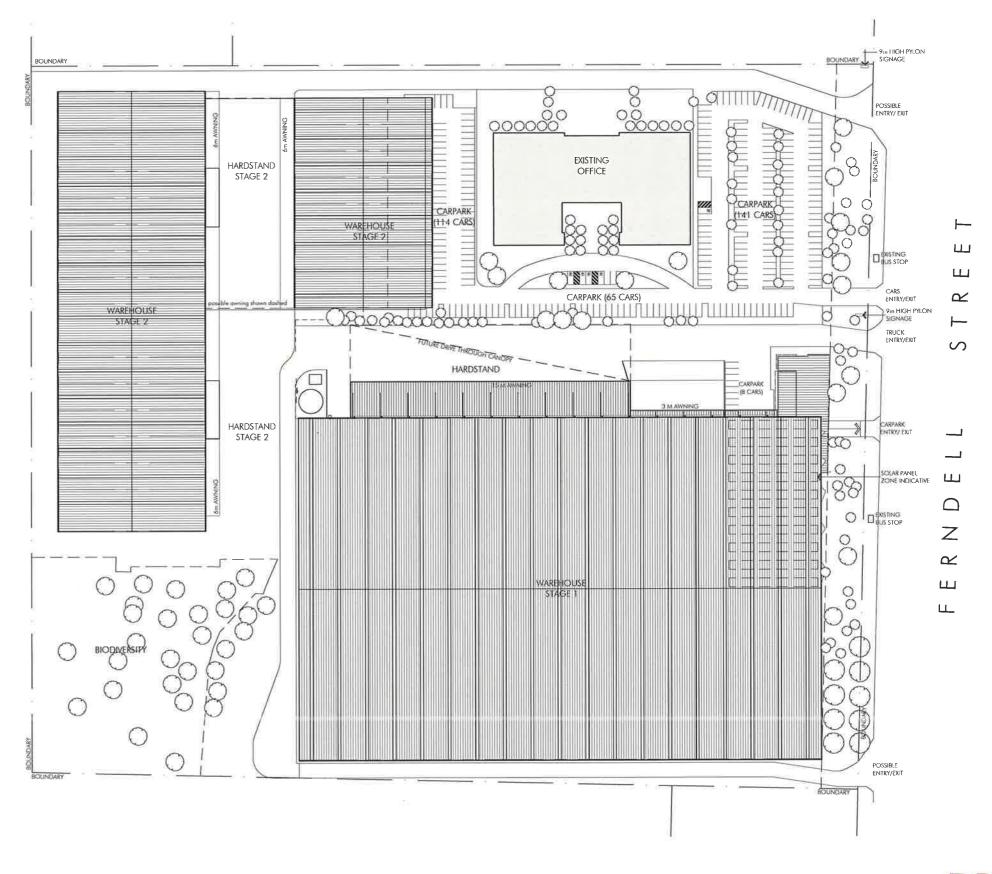
STAGE 2 GF PLAN STAGE 2 ROOF PLAN BASEMENT CARPAR PLAN OFFICE PLANS EXISTING OFFICE PLANS

ELEVATIONS 10248 DA-021 10248 DA-022 10248 DA-023 10248 DA-024 STAGE 1 ELEVATIONS STAGE 1 ELEVATIONS

STAGE 2 ELEVATIONS STAGE 2 ELEVATIONS









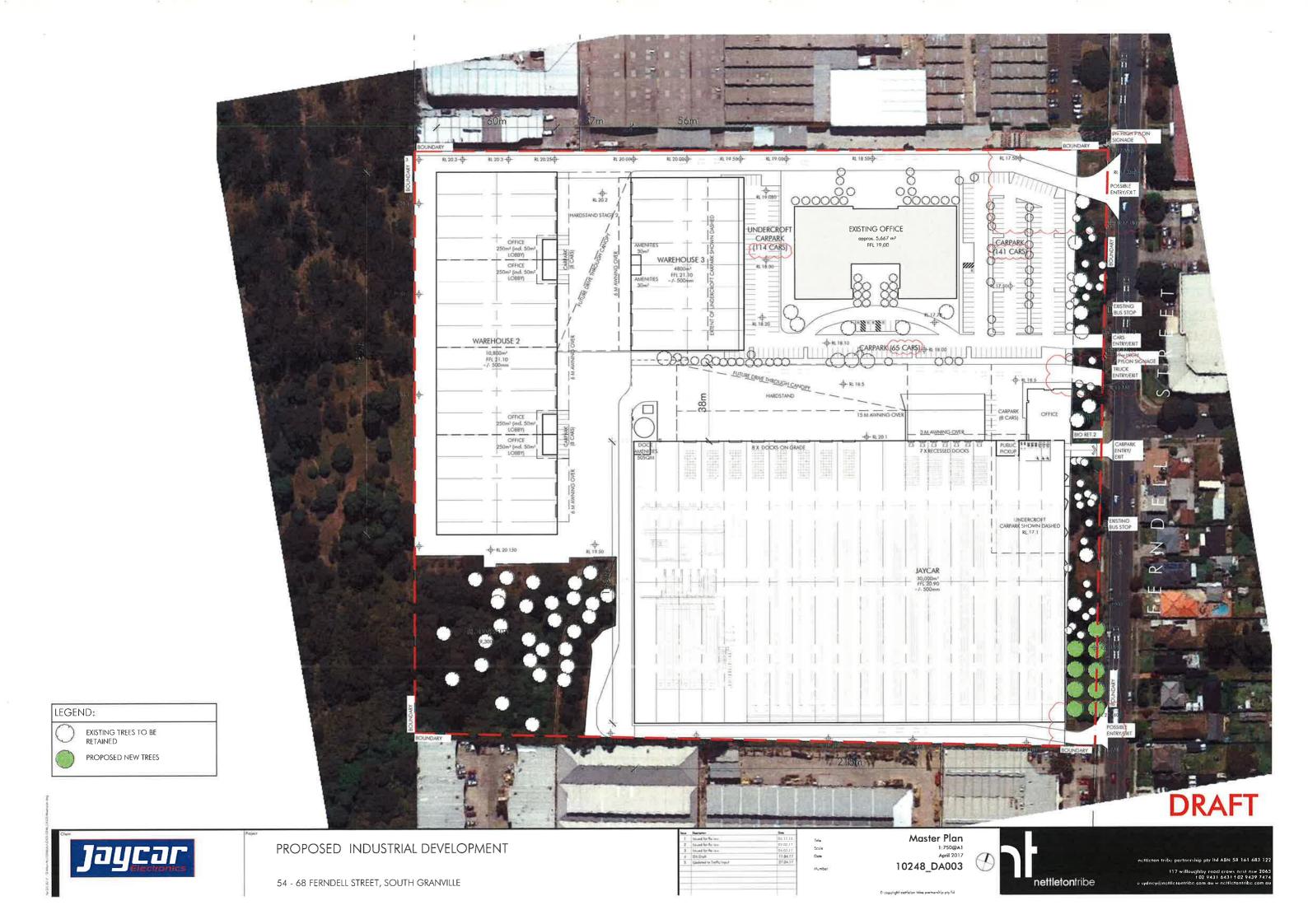


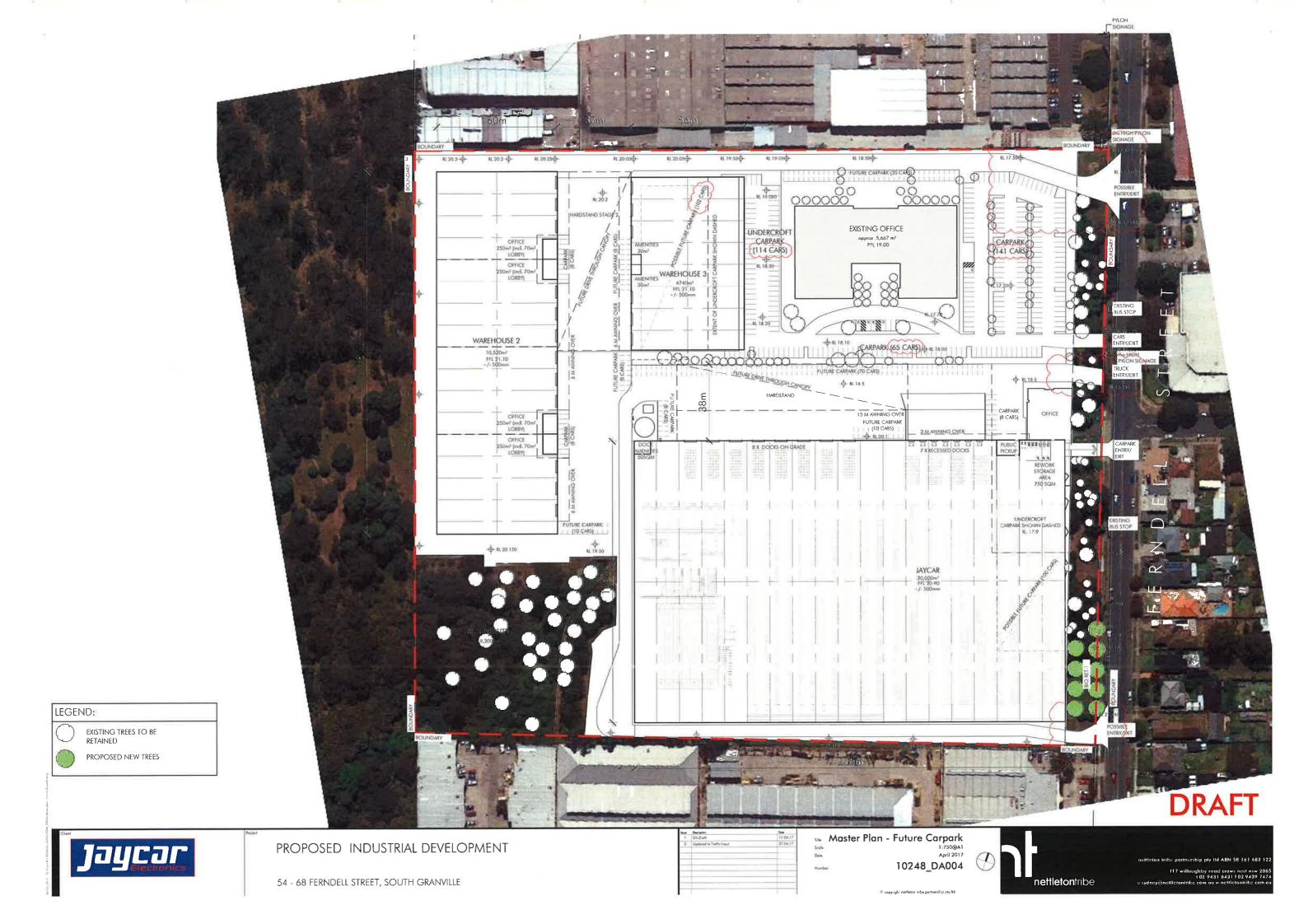
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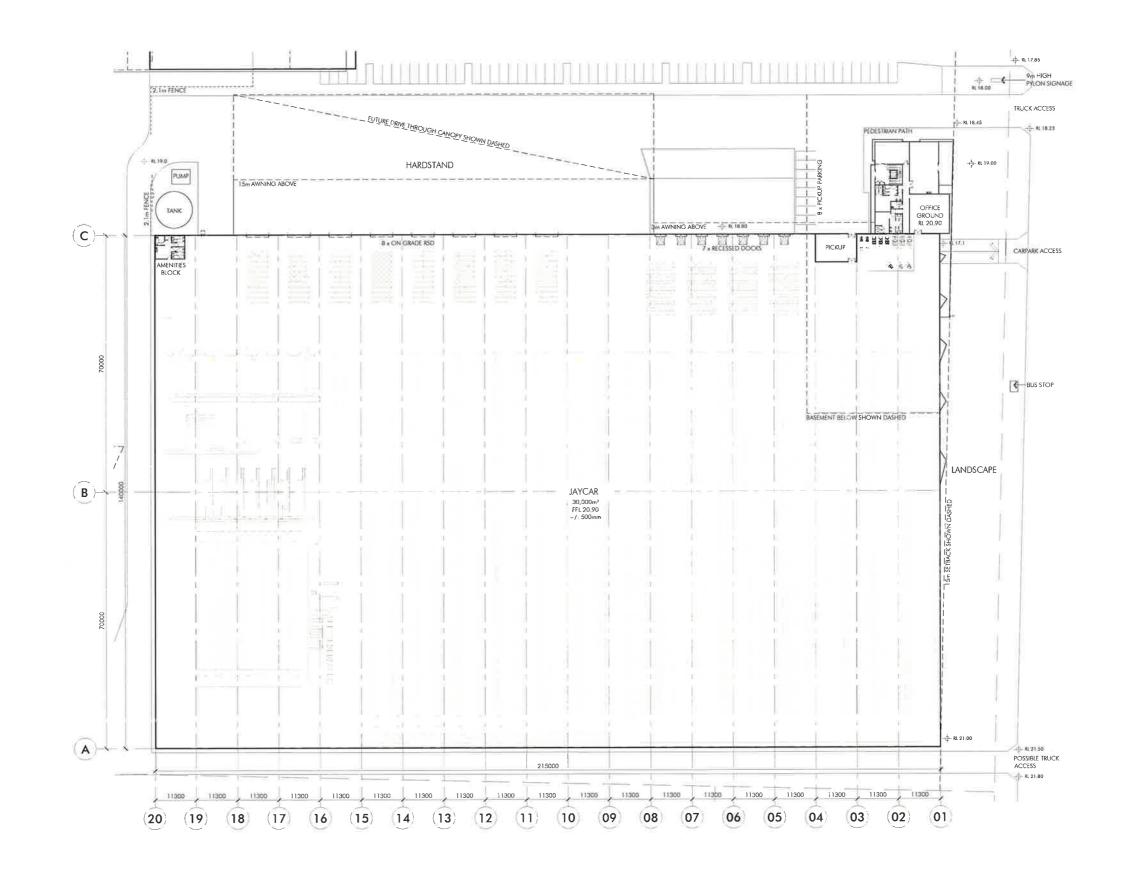
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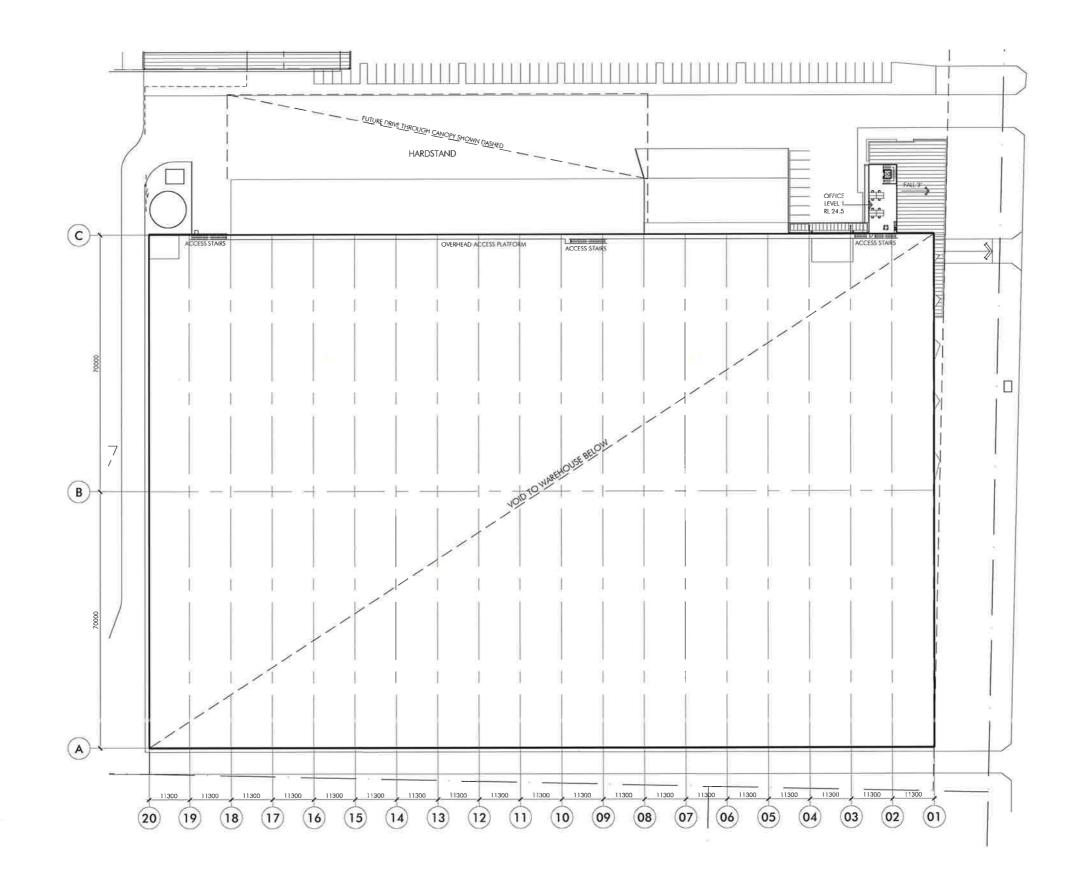




Ground Floor Plan
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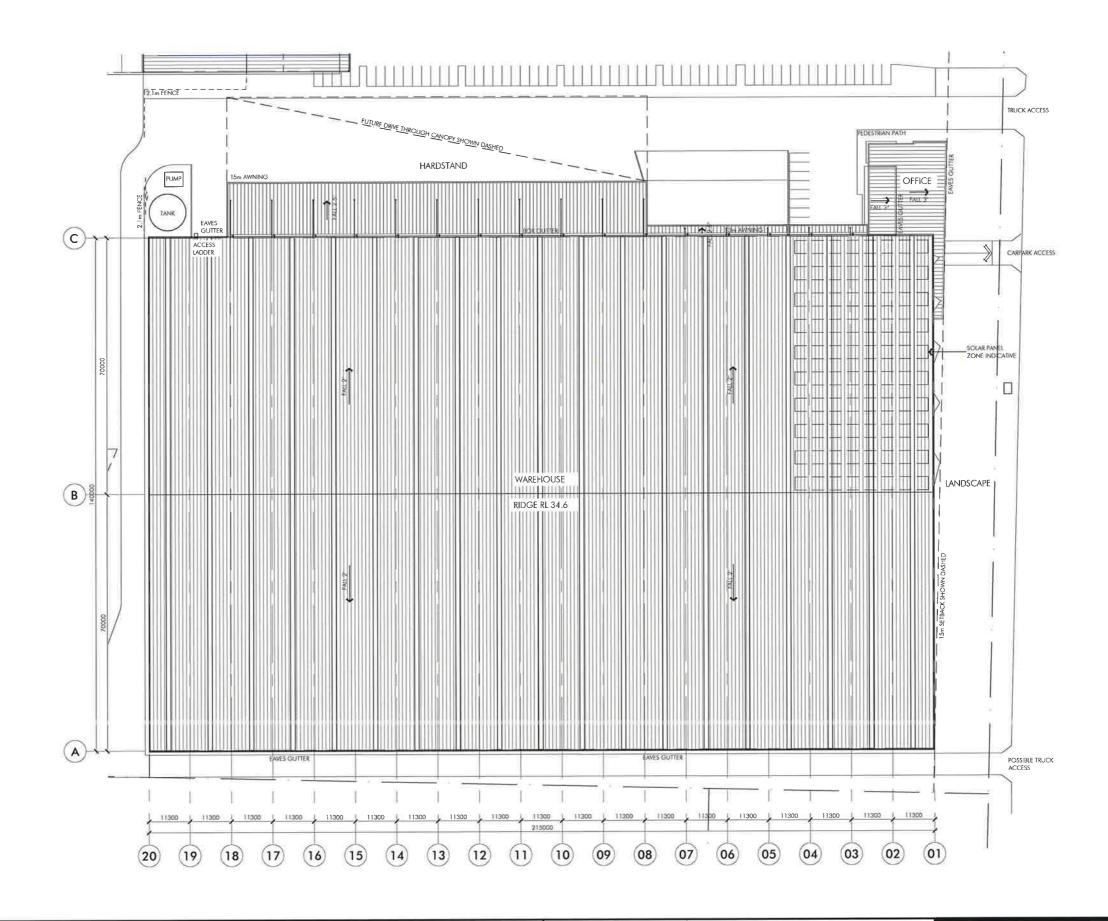




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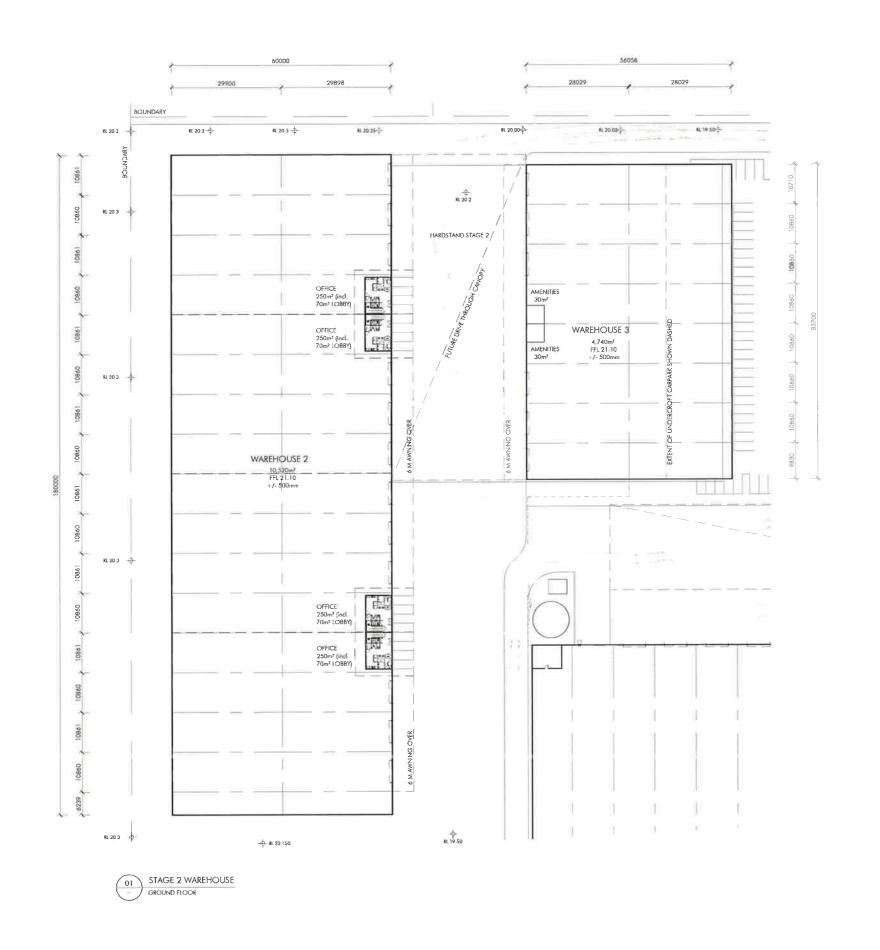


PROPOSED INDUSTRIAL DEVELOPMENT



Roof Plan Stage 1 1:500@A1 April 2017 10248\_DA013







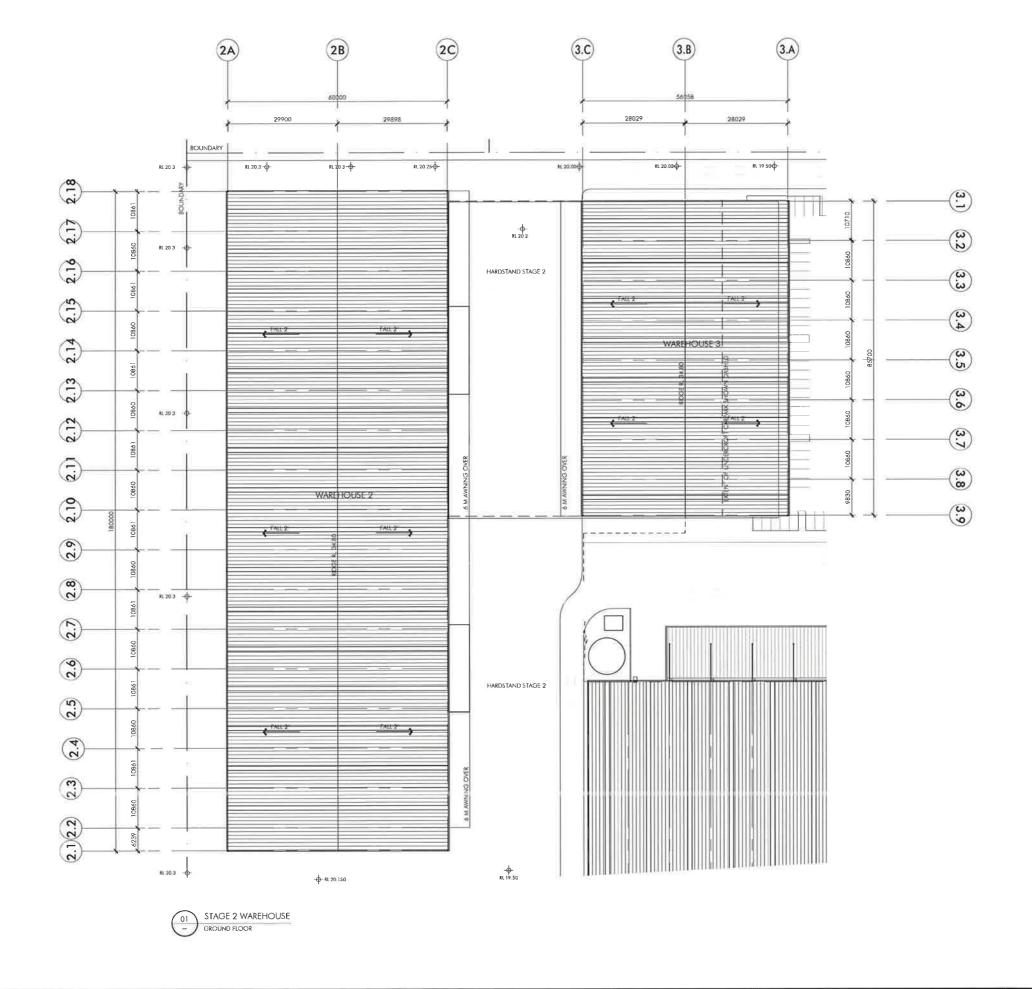


54 - 68 FERNDELL STREET, SOUTH GRANVILLE



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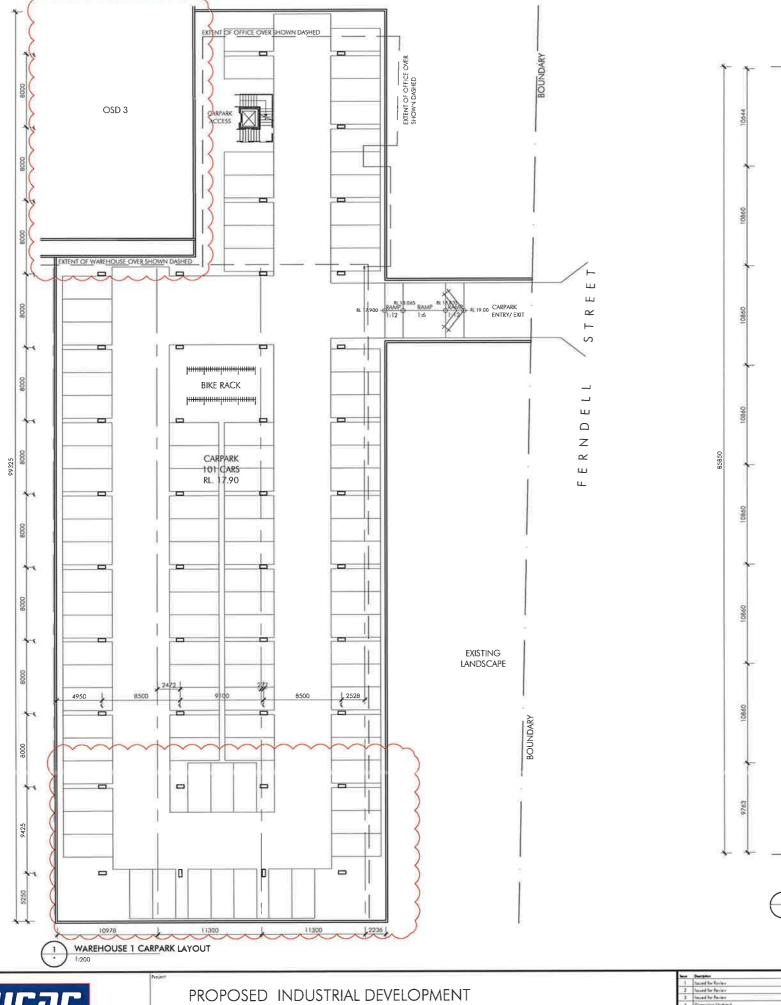


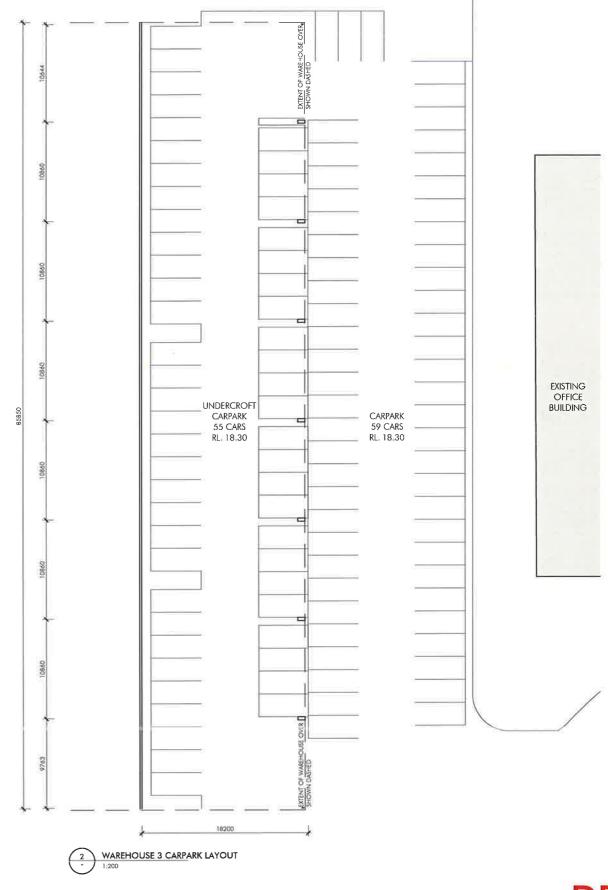
54 - 68 FERNDELL STREET, SOUTH GRANVILLE



Stage 2 Roof Plan
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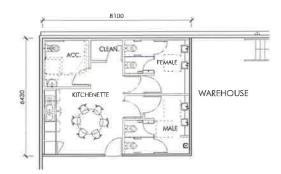
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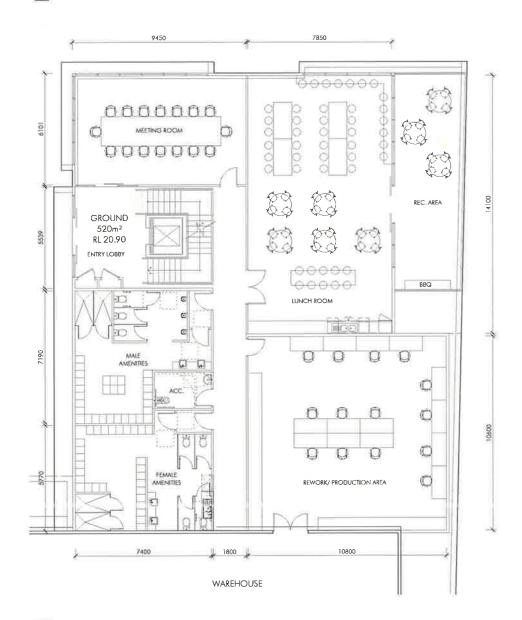
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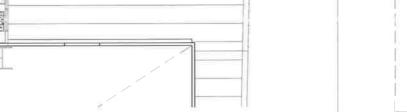




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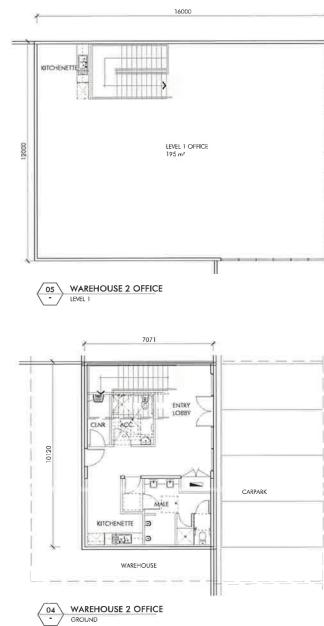


















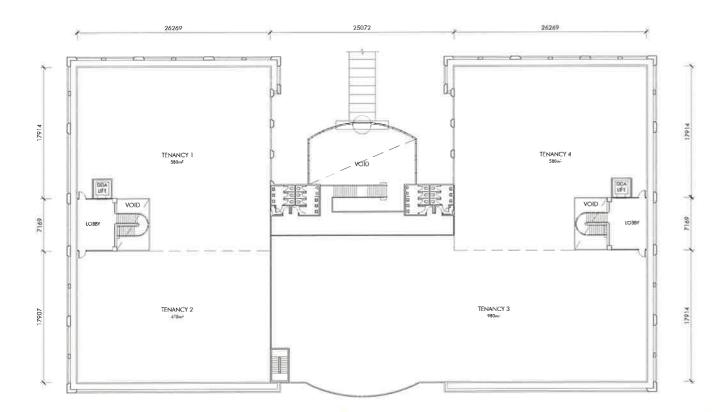




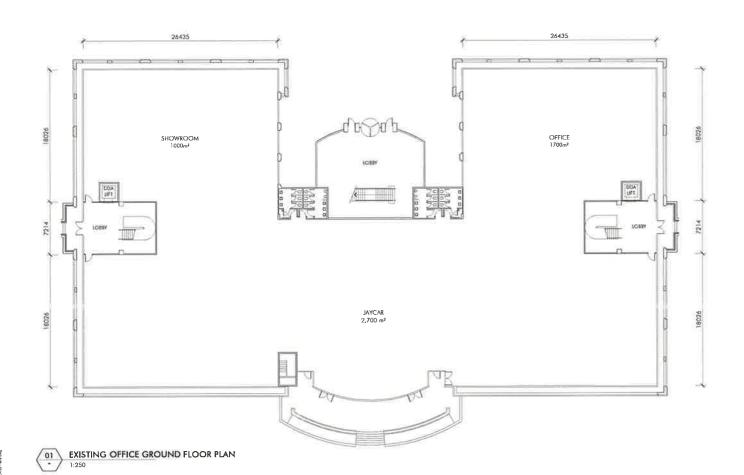
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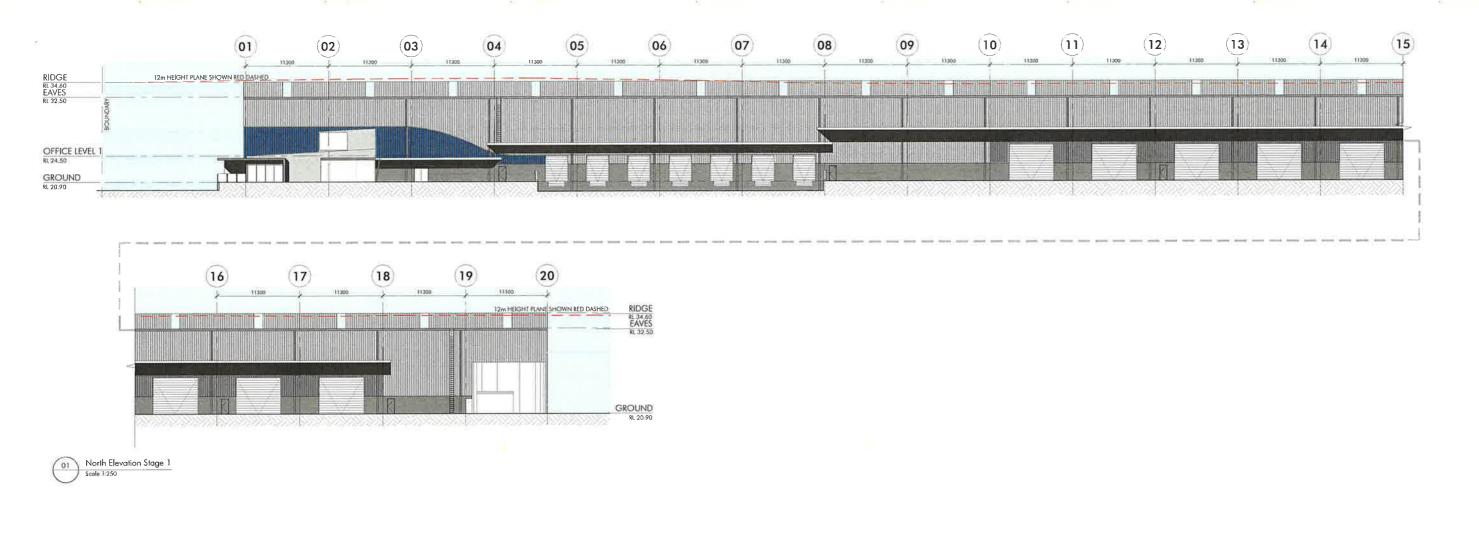
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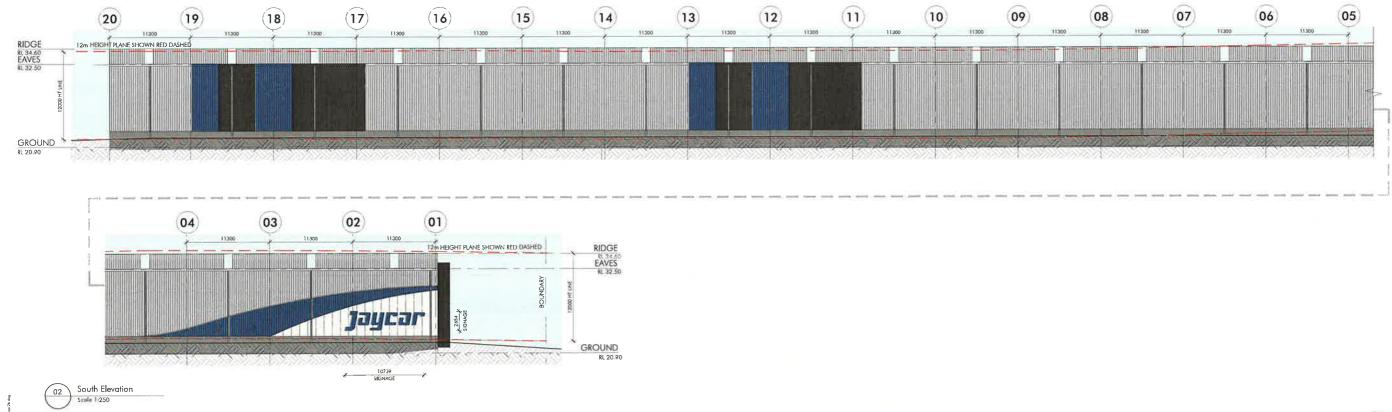
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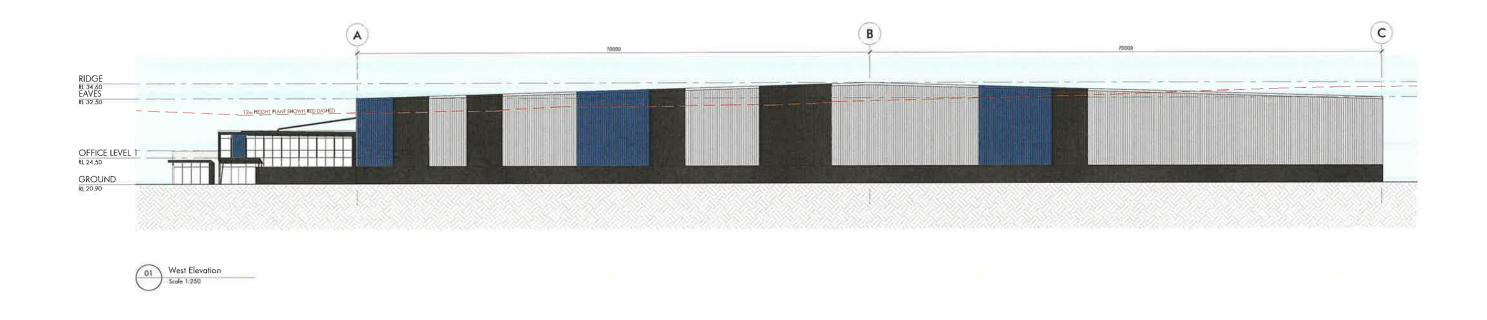
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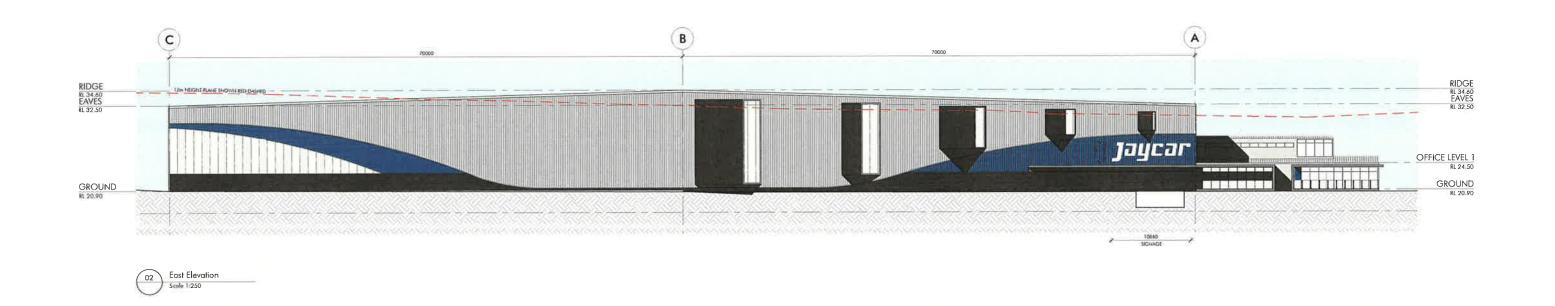


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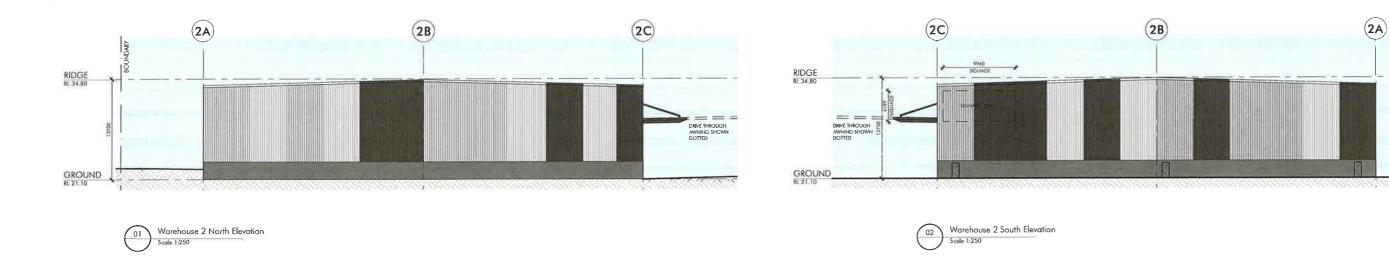


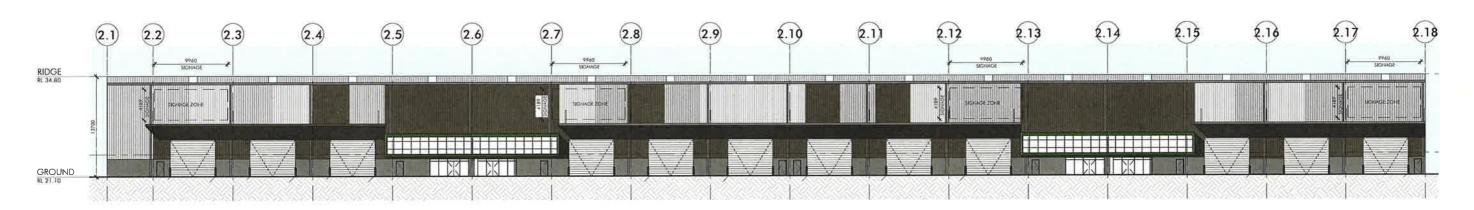


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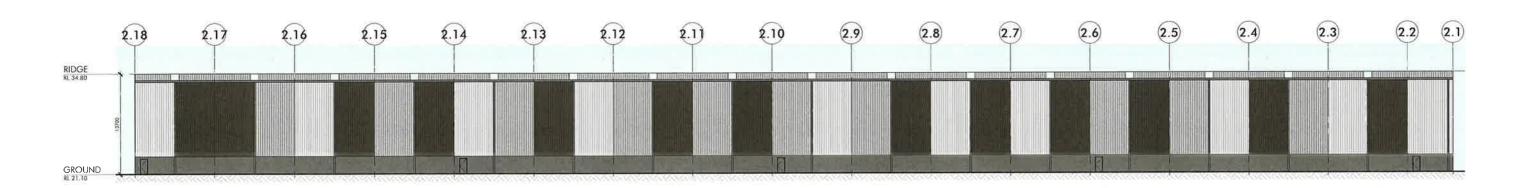


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Warehouse 2 East Elevation



Warehouse 2 West Elevation

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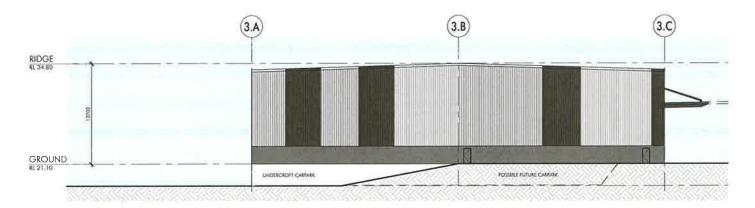
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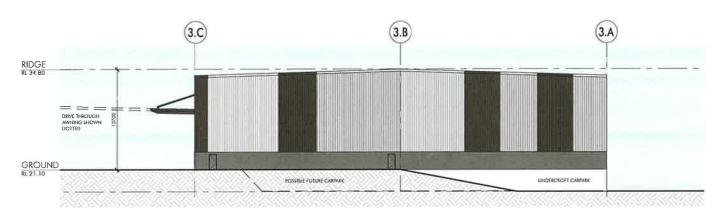
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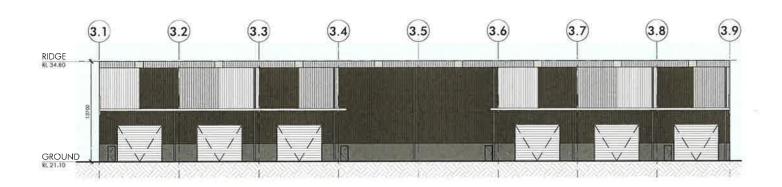




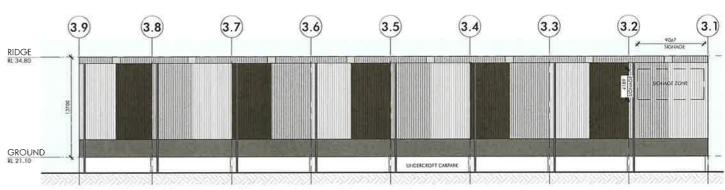




Warehouse 3 South Elevation



C Warehouse 3 East Elevation
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Warehouse 3 West Elevation
Scale 1:250





PROPOSED INDUSTRIAL DEVELOPMENT

54 - 68 FERNDELL STREET, SOUTH GRANVILLE



Stage 2

Stage 2 Elevations
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## 54-68 FERNDELL STREET, SOUTH GRANVILLE CONCEPT STORMWATER MANAGEMENT PLAN

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  2. ALL TRACKING WORKS ARE 1 SEE RESIDERED TO DEDMAL CONDITION.

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#### SITE WORKS - ACCESS AND SAFETY

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- 2. ACCESS TO ADJACENT BUILDINGS AND PROPERTIES SHALL BE MAINTAINED AT ALL TIMES
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- 14 PROVIDE CLEANING EYES (RODDING POINTS) TO PIPES AT ALL CORNERS AND T-JUNCTIONS WHERE NO PITS ARE PRESENT

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- E ALL PAYEMENTS ARE TO BE SET AT 50mm BELOW THE PROTHED PLOCE LEVEL OF THE WARRHOUSE AND OFFEE AREAS LIND.



LOCALITY PLAN

## DRAWING SCHEDULE

DA1.01 COVER SHEET, LOCALITY PLAN, AND DRAWING SCHEDULE

DAZ 01 SEDIMENT AND EROSION CONTROL PLAN AND DETAILS DA4.01 SITEWORKS AND STORMWATER MANAGEMENT PLAN SHEET 1

DA4.02 SITEWORKS AND STORMWATER MANAGEMENT PLAN SHEET 2 DA4.03 SITEWORKS AND STORMWATER MANAGEMENT PLAN SHEET 3

0A4.04 SITEWORKS AND STORMWATER MANAGEMENT PLAN SHEET 4

DA4.06 STORMWATER MANAGEMENT OSD CATCHMENT PLAN

DA4,07 STORMWATER MANAGEMENT WSUD CATCHMENT PLAN DA4.12 BOX CULVERT SECTIONS AND STORMWATER OUTLET DISSIPATER DETAILS

DA4.13 OSD 1 PLAN AND DETAILS

DA4.14 OSD 2 PLAN AND DETAILS

DA4.15 OSD 3 PLAN AND DETAILS DA4.21 EXISTING 50% BLOCKAGE FLOOD DEPTH PLAN

DA4 22 PROPOSED 50% BLOCKAGE FLOOD DEPTH PLAN

DA4.23 EXISTING 50% BLOCKAGE FLOOD CONTOUR PLAN DA4.24 PROPOSED 50% BLOCKAGE FLOOD LEVELS PLAN

DEVELOPMENT APPLICATION





54-60 FERNDELL STREET, SOUTH GRANVILLE

COVER SHEET, LOCALITY PLAN, AND DRAWING SCHEDULE

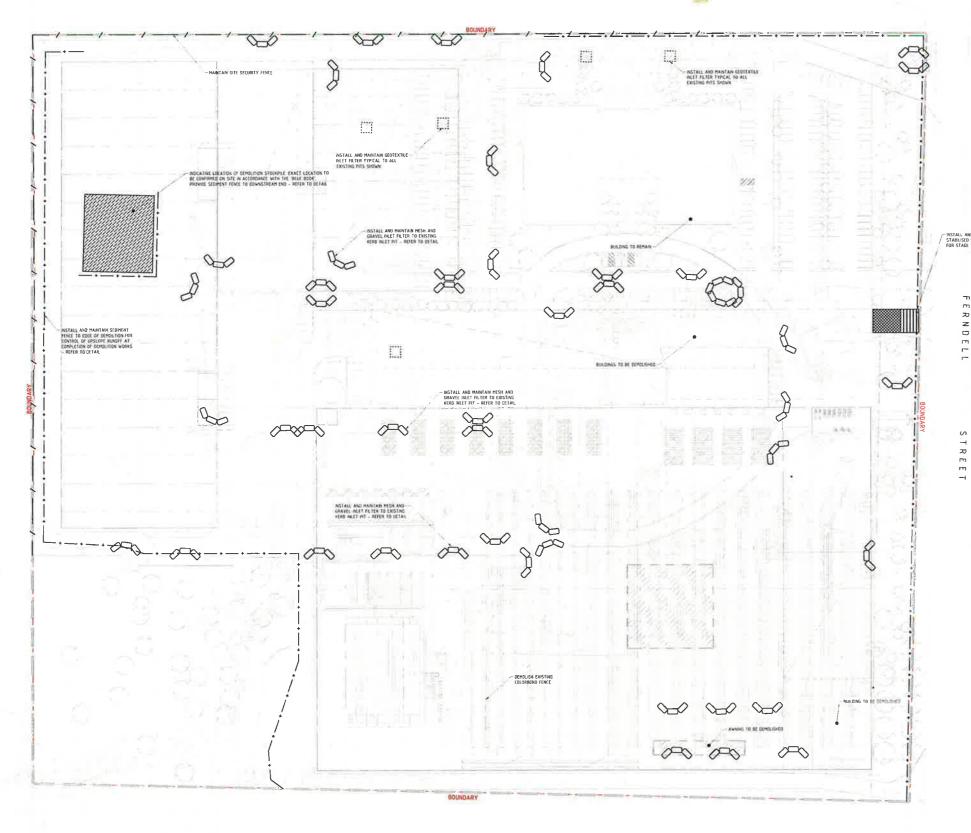
SPARKS +PARTNERS NTS SK MARKET 16166 DA1.01 3

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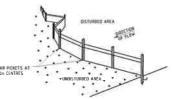
13 Oc 17 [03 OS 19 [28 TI 18

SSUE FOR DEVELOPMENT APPLICATION









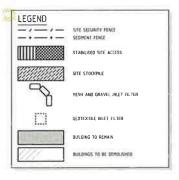


## SEDIMENT FENCE

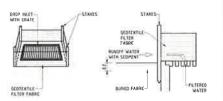
#### NOTES:

- NOTES:

  1. CONSTRUCT SEDMENT FENCES AS CLOSE AS POSSIBLE TO BEING PARALLEL TO THE CONTOURS OF THE SITE, BUT WITH SHALL BETWEEN AS SHAPEN AS THE CRAMBER TO BEING THE ASTOCIATION AND AS THE ASTOCIATION AS







## GEOTEXTILE INLET FILTER DROP INLET SEDIMENT TRAP NOT TO SCALE

### NOTES:

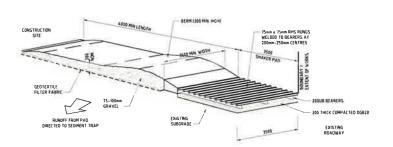
- 1 FARMCATC A COMMAND BARRIER PANGE FROM CEDITATION OF STRAW MALES.
  2 CUT A ZOOMO DEEP PRECHT ALONG THE UPSCHOPE LINE OF THE FERKE FOR THE BOTTOM OF THE FARME TO BE ENTERTHEND.
  3 DOING THE LOAD STAR PRICE THE OFFICE MALES AND THE FORE CONCERS OF PIT MALLS.
  4 PAR SEET-SUPPORTING EDUCETATION OF BURNESS AND THE FORE CONCERS OF THE POSTS ENSURING IT GOES TO THE BASE OF THE FRENCH FIX THE GOTTEXTHE WITH WHIT THE SOR AS RECOMMENDED BY THE MANUAL TURBER ONLY USE GOOD EXTENSE ESCENCIALLY PRODUCED FOR SECURITY FRENCHE FIRE USE OF SHARE LOTH FOR THIS PURPOSE IS NOT SANGFACTORY OF JOING AND AS UPPORT POST WITH A SERIE OFFICIAL OF A SUPPORT POST WITH A SERIE OFFICIAL OF A SHARE LOTH FOR THE PARKET OF THE THE PROPERTY OF THE PARKET OF



## STOCKPILE NOT TO SCALE

### NOTES:

- PACE STOCKHES HORE HAN 2 PRIFERRALY IN PRIES FROM EXITAS VERTILING CONCENTRATED WATER FLOW, ROUGH SAND HAZARD AREAS CONSTRUCT ON THE CONTROL AS LOW, FLATE, COUNTAINED HOURDS WHERE THERE IS SUFFICIENT AREA, LOPSON, STOCKHES SHALL BE LESS THAN 2 HETELS IN REGULAT A MINER INTER HAZ HIT DE A PLACE FOR HORE THAN 10 DAYS, STREUGS FOLLOWING THE APPROVED ESCHOOL SHAPE TO REQULE THE C-FACTION TO LESS FOLLOWING THE APPROVED ESCHOOL OF SHAPE TO REQULE THE C-FACTION TO LESS FOLLOWING THE ARTH BANKS ON THE URSINGS SOLT OF UNIVERSITY ARTHROPHYSICS AND SEDIMENT FENCES IT TO 2 METRES DOWNSLOPE.



## STABILISED SITE ACCESS

- MAINTENANCE

  NOT TO SCALE

  NOT

## **DEVELOPMENT APPLICATION**





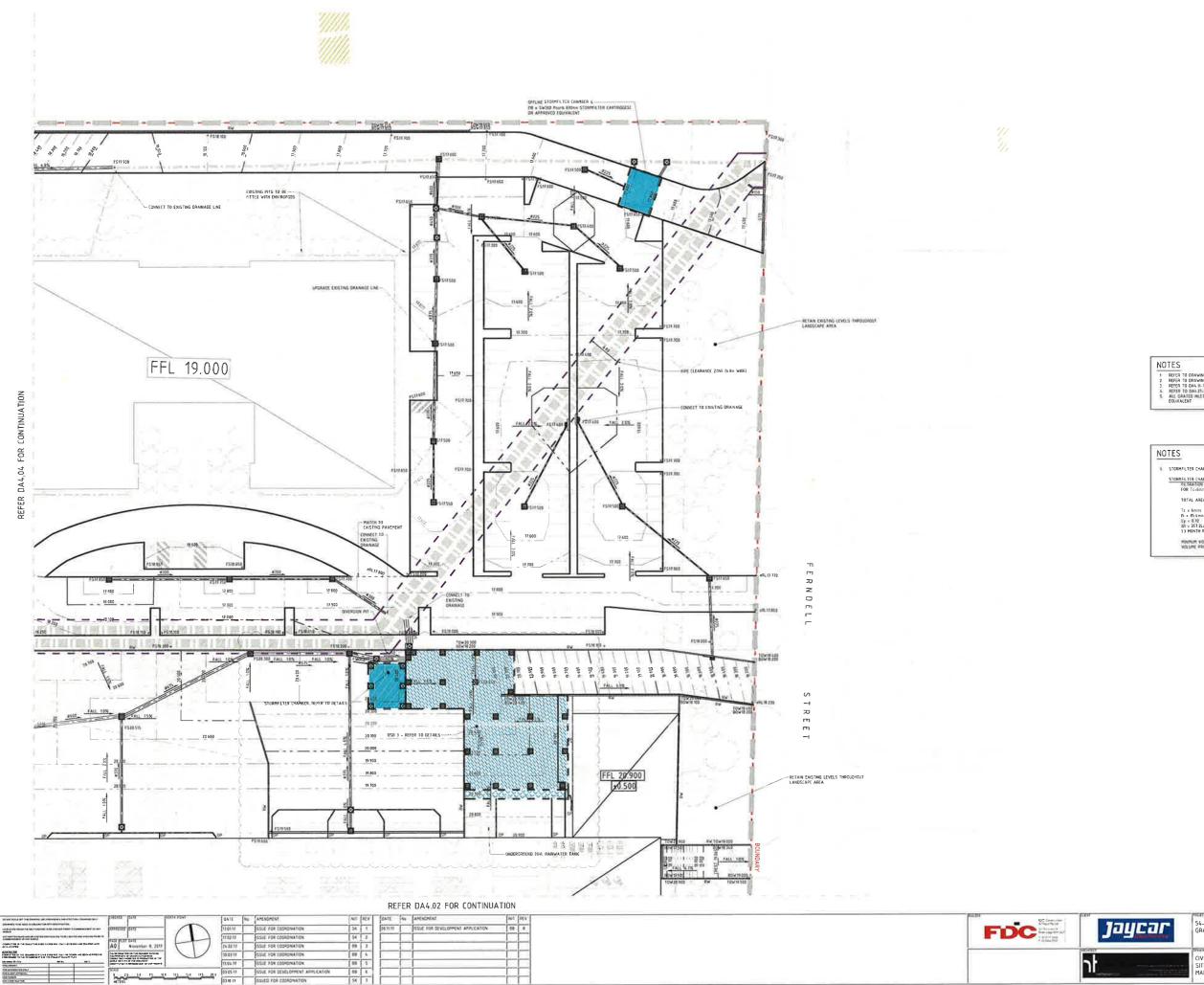
54-68 FERNOELL STREET, SOUTH GRANVILLE

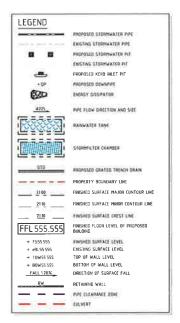
CIVIL DESIGN SEDIMENT AND EROSION CONTROL PLAN AND DETAILS











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  REFER TO DRAWNE DALO SOLD FOR CECTORY IP AND
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STORMFILTER CHAMBER 4

FOR TESTING FROM 13 MONTH ARI EVENT
FOR TESTING.

TOTAL AREA DRAINING TO FILTRATION CHAMBER = 20.914m2 (AS PER CATCHMENT PLAN)

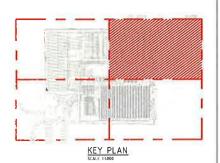
Tc = 6mms

D = 10 5 4mm/h

CF = 35 2L/s

13 HONTH RUNDER IS APPROXIMATELY 30X OF THE QL FLOW = 100 3L/s.

Marmon volume of Fig. I HARTON CHARGER TO BE 33 348 (1072)/A & 8034C & 6454d VOLUME PROVIDED 4 35 343

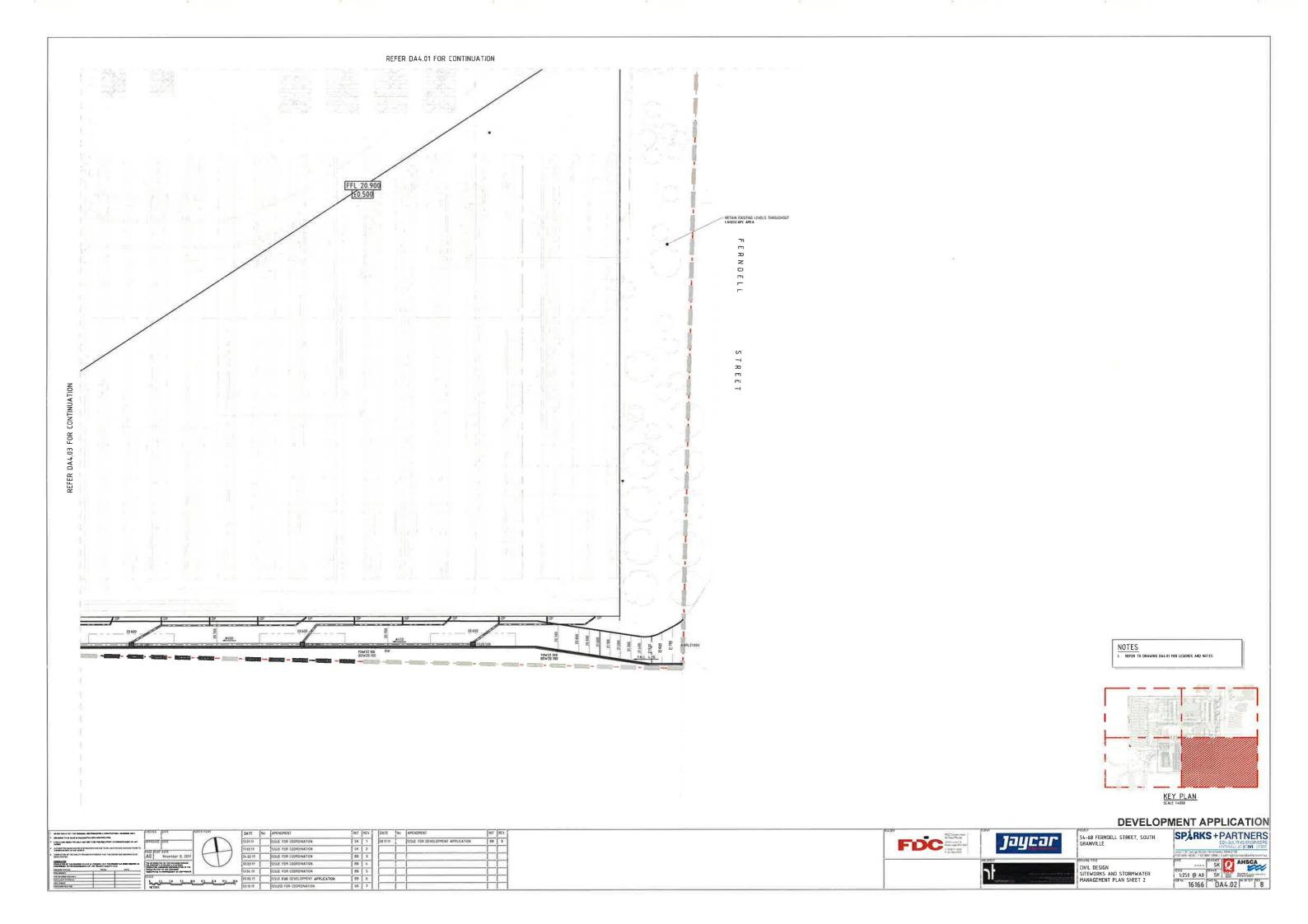


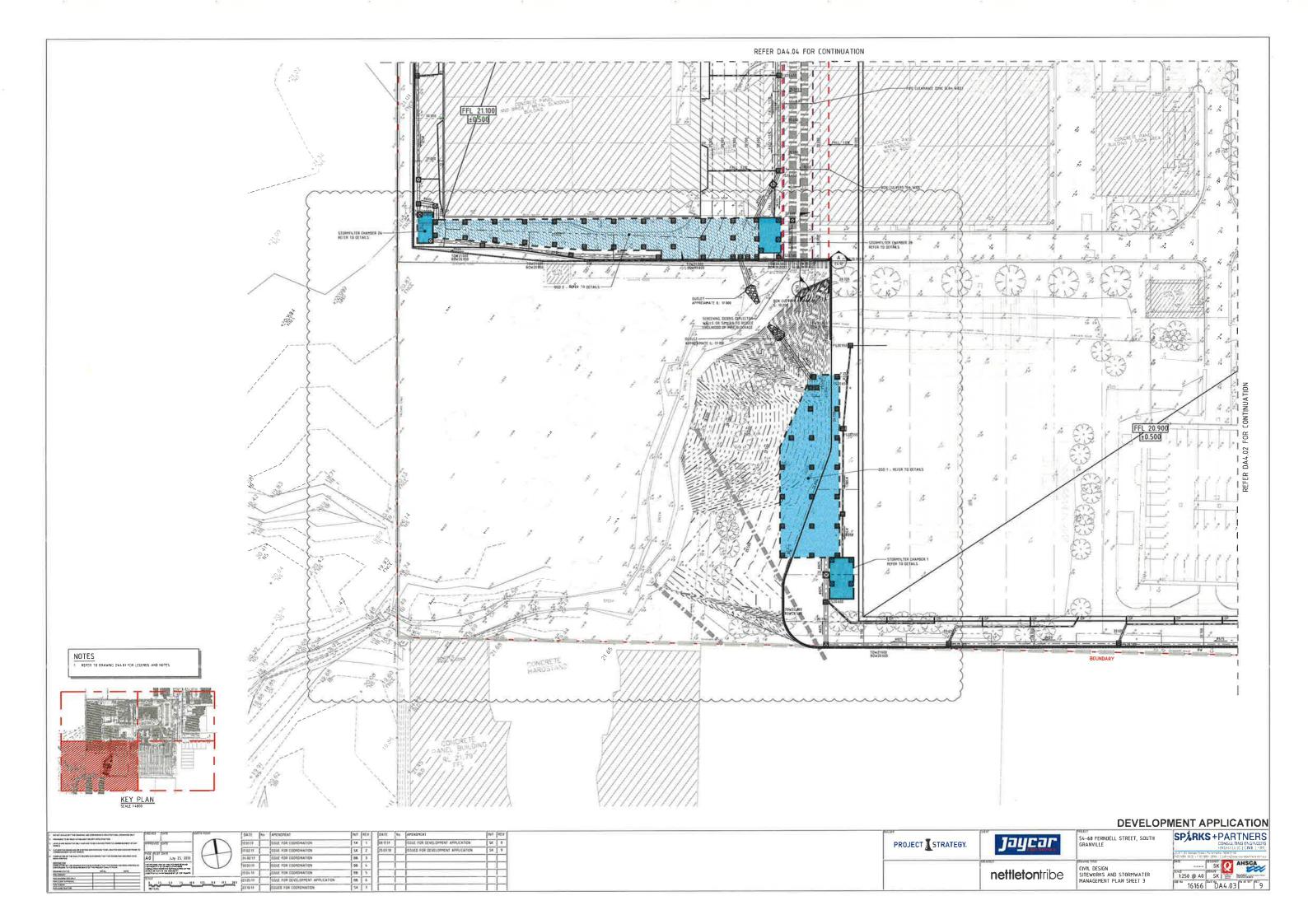
### DEVELOPMENT APPLICATION

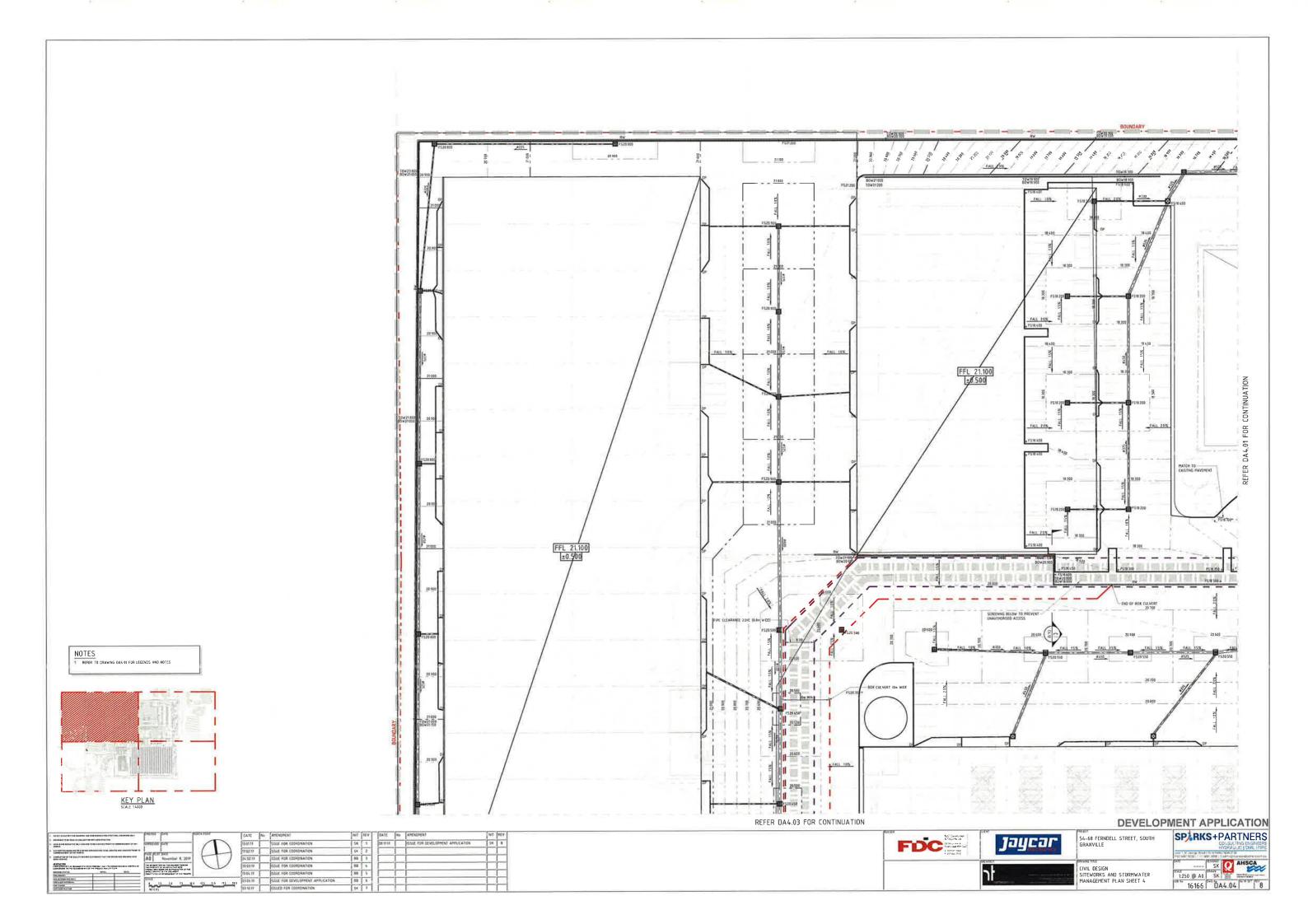
54-60 FERNDELL STREET, SOUTH GRANVILLE

SPARKS+PARTNERS SK AHSCA LZ50 @ A0 SK AHSCA 16166 DA4.01











DEVELOPMENT APPLICATION







LEGEND

050 1

TOTAL DSD 1 CATCHMENT AREA 21,200m2 OSD 2
OSD 2 CATCHHENT 24,067m<sup>3</sup> DSD 2 BYPASS 617m2 (3% OSD 2 AREA) TOTAL DSD 3 CATCHMENT AREA 24,684m2

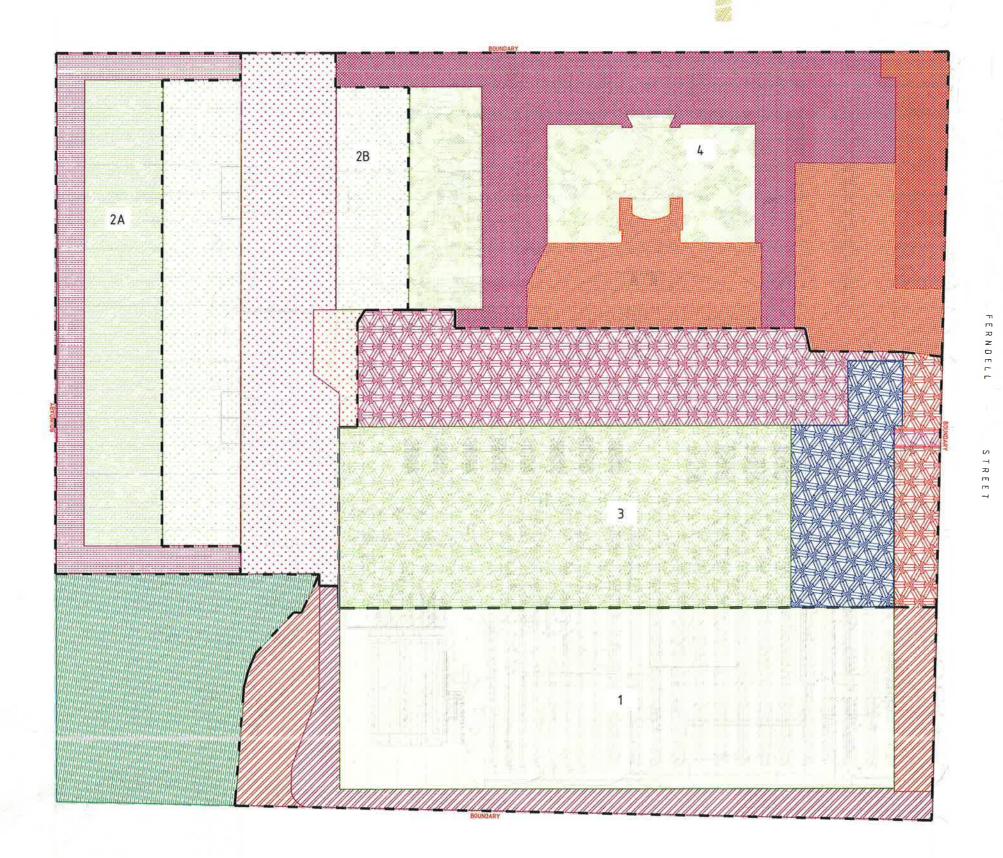
OSD 3 BYPASS 1,523m<sup>3</sup> (6% OSD 3 AREA) TOTAL DSD 3 CATCHMENT AREA 24.646m3

0SD 3 CATCHMENT 23,123m<sup>3</sup>

BIODIVERSITY AND FLOODING AREA 29.695m<sup>2</sup> (NOT INCLUDED IN OSD CALCULATION) TOTAL AREA 100,225m2

SPARKS+PARTNERS CIVIL DESIGN STORMWATER MANAGEMENT OSD CATCHMENT PLAN





CATCHMENT AREA FOR TREATMENT MEASURES

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RODE CATOMENT AREA TO TREATMENT CHARGES IS SEAD INTO TREATMENT CATCHMENT IN 1,3600°

RODE CATOMENT AREA TO TREATMENT CHARGES IS SEAD INTO TREATMENT CHARGES INTO TREATMENT CHARGES IN 1,5500°

MARDISTAND CATCHMENT AREA TO TREATMENT CHARGES IN 1,5500°

MARDISTAND CATCHMENT AREA TO TREATMENT CHARGES INTO TREATMENT

## DEVELOPMENT APPLICATION







54-68 FERNDELL STREET, SOUTH GRANVILLE

SPARKS + PARTNERS

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CIVIL DESIGN STORMWATER MAN, CATCHMENT PLAN

