



Our reference: DOC18/670053
Contact: Fabiana Quinton (02) 9995 5371

Mr Chris Hargood
Senior Planning Officer
Goulburn Mulwaree Council
Locked Bag 22
GOULBURN NSW 2580

Dear Mr Hargood,

Former Goulburn Gasworks, 1 Blackshaw Road, Goulburn NSW

I refer you to the application for remediation and demolition works at the Former Goulburn Gasworks site located at 1 Blackshaw Road, Goulburn NSW (Panel reference no. 2018STH013 and Goulburn Mulwaree Council development application no. DA/0276/1718). The NSW Environment Protection Authority (EPA) understands that the Southern Regional Planning Panel (the Panel) has agreed to defer this application until Jemena (the applicant) supply the Panel with further details in relation to the site reinstatement including landscaping and vegetation. The EPA considers the information below will assist the Panel in their assessment of the application.

The Site

The EPA identifies the site as the Former Goulburn Gasworks owned by Jemena Gas Networks (NSW) Ltd (Jemena) at 1 Blackshaw Road, Goulburn. The site is legally identified as Lot 1 DP 986690, Lot 1 DP 743211, Lot 2 DP 168412 and Lots 1, 2, 4, 5 and 6 of Section 21A DP 758468; and the adjacent Goulburn Mulwaree Council (Council) foreshore area. The Jemena and Council areas are collectively known as "Project Site". The "Project Site" is located adjacent to Mulwaree Ponds (also known as the Mulwaree River).

The Proposed Development

You would be aware that as part of the proposal, Jemena commissioned GHD Pty Limited to prepare a Statement of Environmental Effects (SEE) for remediation and demolition of the former Goulburn Gasworks Site. The proposal includes remediation of on-site contamination to the extent practicable, and capping of residual contamination. The adopted remediation strategies include construction of a low permeability wall along the embankment, excavation and treatment/stabilisation of contaminated soils, maintenance or placement of low permeability capping layer, and implementation of Long Term Environmental Management Plan (LTEMP).

Declaration under the Contaminated Land Management Act 1997 (CLM Act)

Council is advised that contamination at the Former Goulburn Gasworks site has been declared by the EPA as significant enough to warrant regulation under CLM Act. Due to contamination extending to offsite areas, the declaration area was extended in January 2018 to include a section of Council managed foreshore area situated between Mulwaree Ponds and Lot 6 of Section 21A in DP 758468.

As a result of the nature and extent of contamination, the EPA has determined that the Project Site warrants regulation under the CLM Act. The EPA's concerns were that the Project Site is located adjacent to the Mulwaree Ponds and there is the potential for contaminated groundwater to impact on the waters of the Mulwaree Ponds. The declaration enables the EPA to regulate remediation of the "Project Site" to ensure that potential risks to human health and surrounding environment from the contamination are effectively managed. The potential risks identified by the EPA are outlined in the

declaration (No. 20131104) and amendment notice (Notice Number 20174428), which are publicly available on the EPA's Record of Notices at: <https://apps.epa.nsw.gov.au/prclmapp/searchregister.aspx>.

Remediation Works under the CLM Act

The site is currently regulated by the EPA under the CLM Act. Jemena is identified as the proponent on an EPA-approved Voluntary Management Proposal (VMP) (No. 20181701) to undertake remediation on the site (VMP Notice No. 20181701). The VMP can be accessed online from the EPA's public Record of Notices at <https://apps.epa.nsw.gov.au/prclmapp/aboutregister.aspx>.

The objective of the VMP is to implement the remedial strategy and contamination management activities to address potential risks posed by the gasworks contamination to current and future onsite and offsite human health and environmental receptors, including Mulwaree Ponds, as specified in the Former Goulburn Gasworks Remediation Action Plan (RAP) Rev 04 (GHD, November 2017).


As a principal feature of the VMP, a Site Auditor accredited by the EPA under the CLM Act must be engaged by Jemena to ensure that the objectives of the VMP are met. The EPA understands a Site Auditor has been engaged by Jemena to provide advice on the remediation, contamination assessment and plans, and confirm remediation objectives have been met. A Site Audit Statement is also a requirement of the VMP, which will be issued by the Site Auditor upon the completion of the remediation, in accordance with the timeframes specified in the VMP, certifying that the site has been remediated to be suitable for the proposed use.

The remediation strategy details for the site are further described in the RAP and SEE, including the proposed construction of a low permeability capping layer. These strategies have been endorsed by the site auditor and are consistent with the site VMP which was approved by the EPA on 19 April 2018.

The EPA understands that the low-permeability asphalt capping layer to be placed across the remediated area is intended minimise infiltration of rainwater into the ground and reduce the potential for residual contaminants to remobilise into groundwater and migrate offsite to Mulwaree River. However, the EPA considers the applicant and the site auditor should directly respond to the Panel and Council with clarifications on these matters and respond to the reinstatement issues raised in the record of deferment. The EPA reiterates that Jemena is required under the CLM Act to undertake the proposed remediation works in accordance with the VMP, and as overseen by the EPA. As noted above, the remediation as per the VMP will include preparation of a validation report, LTEMP and site audit statement at the closure of the remediation.

Should Council have any queries or wish to arrange a meeting relation to the matters raised above, please contact Fabiana Quinton on (02) 9995-5371 and fabiana.quinton@epa.nsw.gov.au, or Andrew Hawkins on (02) 9995-5793 and andrew.hawkins@epa.nsw.gov.au.

Yours sincerely



ANDY HAWKINS
Unit Head Non- Metro Sites
Contaminated Land Management
Environment Protection Authority

14 September 2018

Cc Jarrod Irving – Jemena Gas Networks (NSW) Limited