

11 September 2018

Jarrold Irving  
Project Manager - Remediation  
Major Projects  
Jemena Gas Networks (NSW) Pty Ltd  
Level 14, 99 Walker Street  
North Sydney, NSW, 2060

Dear Jarrold,

**Re: Jemena Former Gasworks  
1 Blackshaw Road, Goulburn, NSW 2580**

As an independent NSW EPA Accredited Auditor, I have ultimately been engaged to provide an independent review of whether the land at 1 Blackshaw Road, Goulburn (the gasworks site and foreshore area) is suitable for any specified use or range of uses i.e. a "Site Audit" as defined in Section 4 (1) (b) (iii) of the NSW *Contaminated Land Management Act 1997* (the CLM Act).

Jemena is currently implementing the Voluntary Management Proposal (VMP) approved by the NSW EPA and signed by Jemena on 16 April 2018, under which Jemena will remediate the site in accordance with the RAP. I have also been engaged to ensure that the objectives of the VMP are being met.

I issued Interim Audit Advice #1, Former Jemena Gasworks, Goulburn on 11 September 2018 following review of the RAP that concluded that:

*'confirmation of the suitability of the site for the current and approved commercial uses will depend on the successful validation of the remedial works under the direction of the environmental consultant. Site suitability will further be reliant on institutional controls to ensure that the LTEMPs are implemented to maintain the remedial work i.e. hardstand and/or vegetative cover; restrict future abstraction of groundwater and access to soil; and outline restrictions for future commercial/industrial developments i.e. basements and additional capping requirements.*

*The Auditor concludes that the RAP provides an adequate basis for the preparation of more detailed remedial and validation plans subject to consideration of comments made in this IAA. The Auditor has been engaged to review, provide comment and ultimately approve the implementation of those additional documents.*

*The remediation works will be guided and verified by an environmental consultant who, upon completion of the remediation, will prepare validation reports for review by the Site Auditor and submittal to Council and the EPA.*

*Following the remediation and successful verification of those works, the Auditor will prepare a Site Audit Report and Site Audit Statement, in accordance with relevant requirements of the Contaminated Land Management Act 1997'.*



The remedial goals of the RAP are:

- to not adversely impact water quality in the Mulwaree River;
- to be suitable for commercial/industrial land use within the gasworks site from a human health risk perspective; and
- to be suitable for recreational / public open space land use within the foreshore area from a human health risk (consistent with current land uses) and ecological perspective.

The RAP outlines the preferred remedial measures, including the construction of a capping layer, that in combination, are designed to ensure that remedial goals are met. The capping layer element is required to provide:

- a long- term secure barrier of adequate thickness, lateral extent and engineering reliability to ensure the protection of human health for commercial uses over the gasworks site; and
- low permeability material and an appropriate slope to reduce infiltration of rainwater and minimise surface pooling/ponding to ensure the protection of water quality in the Mulwaree River.

These elements are essential to ensure the successful remediation and validation of the site. This is consistent with other large-scale remedial works undertaken such as the former BHP steelworks in Newcastle.

If you have any comments or questions, please do not hesitate to contact the undersigned at [melissa.porter@senversa.com.au](mailto:melissa.porter@senversa.com.au) or via mobile on 0402 537 759.

Yours sincerely,

**Melissa Porter**

NSW EPA Contaminated Land Auditor  
Principal

MP/JP

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