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14 August 2020

Sean Gilchrist
Starryland NSW Pty Ltd c/- PDS Group
Level 1, 63 York Street
Sydney NSW 2000

Via email: sean.gilchrist@pdsgroup.com.au

Dear Sean,

Re: Interim Advice 3 (IA3) Conditional Endorsement of Interim RAP, Gran Central, 26-44 Good Street and 59-61 Cowper Street, Granville NSW

1 Introduction

The PDS Group (PDS) on behalf of Starryland NSW Pty Ltd (Starryland) has appointed Kylie Lloyd of Zoic Environmental Pty Ltd (Zoic), a NSW EPA Auditor accredited (No. 0302) under the Contaminated Land Management (CLM) Act 1997, to conduct an Audit at the proposed Gran Central Development 26-44 Good Street and 59-61 Cowper Street, Granville NSW ("the site").

The aim of the engagement is to enable a site audit statement (SAS) and associated site audit report (SAR) to be prepared that confirms the suitability of the site for proposed redevelopment as mixed commercial and high density residential land use, in accordance with the NSW EPA (2017) Contaminated Land Management Guidelines for the NSW Site Auditor Scheme (3rd edition).

2 Scope of Audit and Nature of Interim Advice

NSW EPA (2017) describes the site assessment and audit process as:

1. *Consultant is commissioned to assess contamination.* The contaminated site consultant designs and undertakes the site assessment and, where required, all remediation and validation activities to achieve the objectives specified by the owner or developer; and
2. *Site auditor reviews the consultant's work.* The site owner or developer commissions the Auditor to review the consultant's work. The Auditor then prepares a SAR and SAS at the conclusion of the review, which are given to the owner or developer.

Therefore, the contaminated land consultant and other relevant parties should be satisfied that the work to be conducted conforms to all appropriate regulations, standards and guidelines and is suitable based on the site history and the proposed land use.



It is understood that the Audit is currently non statutory in nature. If Development Conditions are issued by Council, the Audit may become statutory in nature and require notification to NSW EPA.

3 Current Interim Advice

In preparing this interim audit advice, the following report has been reviewed:

- Golder (07 July 2020e) Interim Remedial Action Plan Gran Central Building Development, Granville NSW (Ref: 19130799-007-R-Rev0).

The purpose of the current IA is to provide an opinion on the appropriateness of the interim remedial strategy following the review of existing information related to site conditions and contamination status.

In addition, the following reports related to land contamination assessment have been referred to:

- Golder Associates Pty Ltd (Golder) (1 November 2019) Proposed Gran Central Development Preliminary Environmental Investigation Report (Ref: 19122955-001-R-Rev0);
- Golder (7 February 2020a) Technical Memorandum Soil Vapour Sampling and Analysis, Gran Central Development, Granville (Ref: 19130799-004-TM-Rev0)
- Golder (17 February 2020b) Proposed Gran Central Development Geotechnical and Hydrogeological Investigation report (Ref: 19130799-003-R-Rev0 GHI)
- Golder (25 June 2020c) Preliminary In Situ Waste Classification Report, Gran Central Development, Granville (Ref: 19130799-005-L-Rev1);
- Golder (26 June 2020d) Draft Interim Remedial Action Plan Gran Central Building Development, Granville NSW (Ref: 19130799-007-R-RevA).

4 Summary of Investigation

A PSI with limited sampling of soil and groundwater was completed along with a second round of soil, soil vapour and groundwater (separate reports/memorandums) with the following outcomes:

- The desktop review indicated the site had been a mix of low density residential and commercial operations historically. Currently commercial use includes car sale yards with associated repairs and religious artefacts.
- Adjacent premises were also low to high density residential and commercial properties with two service station noted to the west of the site along Parramatta Road
- Soil vapour sampling (2 locations) adjacent to the service stations indicated soil vapour from service station operations was not detected although chloroform amongst other VOCs were detected below relevant criteria.
- Soil sampling across eight boreholes indicated that fill was typically less than 0.5m deep with asbestos (AF/FA) being detected above criteria in BH02, BH03 and BH103 in the south western portion of the site, all other CoPCs analysed were below the adopted site criteria.
- Site coverage for soil sampling could not be achieved due to access issues.
- Groundwater sampling noted:
 - Groundwater was encountered at the boundary between weathered siltstone and the overlying remanent clay soil and within underlying fractured/weathered siltstone:



- Groundwater levels were around 9.0 mAHD and appeared to flow in a northerly direction
- For single basement (understood to be the preferred design option) average inflows into an open excavation would be around 600 L/d
- Water quality indicated that various heavy metals were detected above one or both of the fresh and marine water GILs including manganese, aluminium, copper, chromium, lead, , nickel and zinc, Chloroform was the only organic analyte detected, and nutrients were noted to be below indicative site criteria.
- The Interim RAP proposed the following actions:
 - Source removal by excavation and offsite disposal of fill materials is the proposed remedial method, this includes setbacks
 - Validation will be undertaken on setback areas only and include laboratory analysis and clearance by an occupational hygienist
 - Formal waste classification documentation will be prepared for all waste soil/fill excavated and labelled for offsite disposal

5 RAP Endorsement

The Executive Summary of Golder Associates' Interim RAP identifies it has been prepared prior to completion of the DSI to manage asbestos impacts in soil and progress the development consent process.

The investigations completed to date have established the history and current use of the site and included preliminary investigation. The preliminary investigation was completed to minimise impact to current tenants and were conducted using boreholes. It is considered this methodology may result in the presence of asbestos to be laterally greater than currently interpreted during the investigations.

The proposed development incorporates a building footprint covering the majority of the site with a one level basement. Although the information provided to date identifies the site is capable of being made suitable subject to the successful implementation of the RAP, additional works are required to confirm the full extent of the remedial works necessary to enable the site to be made suitable for the proposed development.

Notwithstanding the above, the Auditor considers that the Golder's Interim RAP (2020) provides adequate interim remedial strategy given the current constraints providing the following conditions are met:

1. A DSI and waste classification is compiled in accordance with the NSW EPA (2020) Consultants Reporting on Contaminated Land Contaminated Land – Contaminated Land Guidelines including:
 - a. Data gaps identified in Conclusions of the Golder (2019) PSI
 - b. Soil investigations completed and proposed with discussion on site suitability including where setbacks are included in the development plans noting sampling density required to meet current guidelines and setbacks described in Section 1.1 of Golder Geotechnical and Hydrogeological Investigation Report;
 - c. Groundwater investigations completed and proposed further monitoring / investigation particularly given TCE encountered during soil vapour sampling



- d. Soil vapour investigation completed and further monitoring/investigation is considered necessary given the results, the proposed basement depth and measured groundwater depth.
 - e. Provision of Data Quality Objectives
 - f. A full discussion of QA/QC for both field and laboratory for all historical and proposed investigations
2. The Golder (2020d) Interim RAP is revised based on the results of the additional investigations and provided as a final RAP for review and endorsement prior to commencement of remedial works.

6 Closure

This interim advice does not constitute a SAS or a SAR, but rather is provided to assist the Client in the assessment and management of contamination issues at the site. The information provided herein should not be considered pre-emptive of the final Audit conclusions. It represents the Auditor's opinion based on the review of currently available information.

Should you have any queries or wish to discuss any points, please do not hesitate to contact Joshua Lloyd or the undersigned

Yours sincerely,

Kylie Lloyd
Contaminated Site Auditor (0302)
Zoic Environmental Pty Ltd