

ID	Document	Report Section	Auditor Comment (IA1, dated 20 July 2020)	Golder Response
1	PSI (Golder 2019)	N/A	To aid in consideration of soil vapour intrusion risk, please provide sewer/service plans where available for the site	Pending
2	PSI (Golder 2019)	N/A	What is the potential for PFAS to have been used or stored on the site?	Pending
3	PSI (Golder 2019)	N/A	What are the potential future uses of groundwater on site and the surrounds?	Pending
4	PSI (Golder 2019)	N/A	Ecological based criteria should be considered in areas where proposed setbacks will be used for landscaping.	Pending
5	PSI (Golder 2019)	N/A	Consideration should be given on the extent of potential asbestos being more widespread impact given the number of samples and the method of investigation and sampling.	Pending
6	Soil vapour technical memorandum (Golder (2020a)	N/A	Source and impact of chlorinated compounds within any resultant conceptual site model.	Pending
7	Soil vapour technical memorandum (Golder (2020a)	N/A	Criteria for HSL / HIL A/B have been used. The Auditor considers these criteria are conservative for the proposed development and construction.	Pending
8	Soil vapour technical memorandum (Golder (2020a)	N/A	Did the weather encountered onsite represent conservative conditions during vapour sampling vapour and is an additional round of soil vapour sampling warranted?	Pending
9	Soil vapour technical memorandum (Golder (2020a)	N/A	The soil vapour wells were installed to a maximum depth of 1.65m BEGL. How do the results at this depth relate to the proposed basement depth and groundwater levels?	Pending
10a	Soil vapour technical memorandum (Golder (2020a)	N/A	Please include QA/QC requirements with the following at a minimum: Seal integrity of the vapour wells	Pending
10b	Soil vapour technical memorandum (Golder (2020a)	N/A	Please include QA/QC requirements with the following at a minimum: Purge method/volume	Pending
10c	Soil vapour technical memorandum (Golder (2020a)	N/A	Please include QA/QC requirements with the following at a minimum: Decontamination requirements	Pending
10d	Soil vapour technical memorandum (Golder (2020a)	N/A	Please include QA/QC requirements with the following at a minimum: Sample splitting method	Pending
10d	Soil vapour technical memorandum (Golder (2020a)	N/A	Please include QA/QC requirements with the following at a minimum: Field instruments utilised and associated calibration requirements/evidence.	Pending
11	Groundwater investigation (Golder (2020b)	N/A	How were the groundwater monitoring wells developed and sampled?	Pending
12	Groundwater investigation (Golder (2020b)	N/A	Please provide manual dip water levels for all sampled bores.	Pending
13	Interim waste classification (Golder 2020c)	N/A	It is noted the report is interim in format, the Auditor understands that the document will be updated with the results of further soil sampling which will likely include TCLP analysis;	Pending
14	Interim waste classification (Golder 2020c)	N/A	Please segregate tables of laboratory results attached to the forthcoming final waste classification to relevant waste materials which to ensure comparison of results against the proposed waste classification.	Pending
15	Interim waste classification (Golder 2020c)	N/A	Please consider comparing VENM waste classification against published background concentrations regionally and where the results diverge either justify or reclassify.	Pending
16	Draft Interim Remedial Action Plan (Golder 2020d)	N/A	Results are presented in this Interim RAP that have not been presented elsewhere and must be provided in a standalone Detailed Site Investigation Report meeting NSW EPA Guidelines for Consultants Reporting including all quality control / quality assurance details.	Noted. Text has been included in Section 5.1 to note that the results have not been presented in a DSI and will be included in the DSI report recommended for the site.
17	Draft Interim Remedial Action Plan (Golder 2020d)	Section 1.2	The remediation objective included in dotpoint 1 of Section 1.2 "setting a strategy that will render the site suitable for the proposed land use" should be adjusted to incorporate the intent of the interim nature of the document as stated in Paragraph 3 of the executive summary 'This interim RAP has been prepared prior to completion of the DSI to manage asbestos impacts in the soil'.	Text updated to note that remediation strategy is for asbestos in soil and that a DSI is yet to be completed.
18a	Draft Interim Remedial Action Plan (Golder 2020d)	Section 1.3	Should the Interim RAP scope of work include: A statement on additional investigations as identified in Table 10 (i.e. SAQP documenting the proposed works including sampling from six borehole locations noting this should to achieve the sampling density required by EPA 1995, installation of one additional groundwater monitoring well, one additional groundwater monitoring event, one additional soil vapour monitoring event?	Noted. Text in Section 1.4 has been updated to state that the scope of the interim RAP is based on preliminary investigations only and that additional investigations and preparation of a DSI report are recommended.
18b	Draft Interim Remedial Action Plan (Golder 2020d)	Section 1.3	Should the Interim RAP scope of work include: Consideration that the potential impact from asbestos is more widespread given the limited sampling and the investigation methodology completed for the works to date?	No edits. The scope of work is based on current known contamination only. The RAP will be revised following completion of the DSI.
18c	Draft Interim Remedial Action Plan (Golder 2020d)	Section 1.3	Should the Interim RAP scope of work include: A risk assessment to consider vapour intrusion risk if identified as necessary?.	No edits. The scope of work is based on current known contamination only. The RAP will be revised following completion of the DSI and will include recommendations for a risk assessment if required.
18d	Draft Interim Remedial Action Plan (Golder 2020d)	Section 1.3	Should the Interim RAP scope of work include: Requirement of preparing Revised/Final RAP based on above additional investigations?	Noted. Text has been included to note that the interim RAP will be revised following completion of the DSI.
19a	Draft Interim Remedial Action Plan (Golder 2020d)	Section 2	It would be beneficial if this section includes discussion of setbacks.	No edits to text. Set backs are detailed in Section 1.2 Proposed Site Development and presented in Appendix C.
19b	Draft Interim Remedial Action Plan (Golder 2020d)	Section 2	Noting the limited information on presence of asbestos in fill across the site, does the Interim RAP only cover the hatched area in Figure 2 or the entire site?	No edits to text. The interim RAP applies to the entire site as shown on Figure 1 (as referenced in Section 2). Figure 2 identifies the "estimated extent of remediation excavation" based on current known contamination and may be revised following completion of the DSI.
20	Draft Interim Remedial Action Plan (Golder 2020d)	Section 4.2	Should discussion of the adjacent Caltex Service be included here?	Minor edits to text. Table 2 identifies that a service station site is present adjacent to the western site boundary.
21a	Draft Interim Remedial Action Plan (Golder 2020d)	Section 5	Whilst acknowledging the time limitations on provision of reports documenting investigations completed, the Auditor has not been provided with a standalone report summarising investigations completed with appropriate discussion on methodology and quality assurance/quality control data. Until this has been provided the following is noted: Appropriate density across the site has not been completed (noting proposed additional investigations).	Noted. Text has been included in Section 5.1 to note that the results have not been presented in a DSI and will be included in the DSI report recommended for the site. Sampling density will be considered in the SAQP to be prepared prior to undertaking additional intrusive investigation works.
21b	Draft Interim Remedial Action Plan (Golder 2020d)	Section 5	The method of sampling may underestimate the presence of asbestos across the site.	Noted. Additional text included to note that 500 ml samples (not 10L samples) were collected. Sampling method to be considered in the SAQP prepared prior to undertaking additional intrusive investigation works.

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21c	Draft Interim Remedial Action Plan (Golder 2020d)	Section 5	The density of sampling for asbestos should be reviewed against WA DOH guidance.	Sampling density to be considered in the SAQP to be prepared prior to undertaking additional intrusive investigation works. Reference to additional sampling required in Table 10.
21d	Draft Interim Remedial Action Plan (Golder 2020d)	Section 5	The potential for higher concentrations of volatile organic compounds in soil vapour to be present in the future.	Noted. No edits to text. Additional sampling to be undertaken as part of the additional works, and as stated in Section 5.4 of the interim RAP <i>"further discussion and consideration of the results with respect to proposed development would be included in the DSI"</i> .
22	Draft Interim Remedial Action Plan (Golder 2020d)	Section 5.5	Section 5.5 would benefit from being updated to include COPCs for each potential source and a delineation of onsite and offsite receptors and exposure pathways. Given comments above regarding setbacks being used for landscaping, onsite flora and fauna should be considered.	Table 3 updated to include COPCs, on-site flora and fauna as receptors, and distinction between on-site and off-site receptors. The CSM will be refined following completion of the DSI.
23a	Draft Interim Remedial Action Plan (Golder 2020d)	Section 5.6	Given this section covers the entire site please consider the following: Whilst acknowledging the northern portion of the site has not had sufficient investigations completed, Table 4 indicates that the only areas requiring management for asbestos is the south/south-western portion of the site. Should it be assumed that the fill across the entire site is impact until the DSI confirms otherwise?	No edits to text. As noted in Table 4, the requirement for remediation for the northern portion of the site will be re-evaluated following the DSI.
23b	Draft Interim Remedial Action Plan (Golder 2020d)	Section 5.6	Given this section covers the entire site please consider the following: Should potential soil vapour impact be included in Table 4?	No edits to text. Based on preliminary investigations soil vapour is currently not a risk to site users. This will be re-evaluated following the DSI.
24	Draft Interim Remedial Action Plan (Golder 2020d)	Section 6.2	Notwithstanding this is an Interim RAP, please see comments in Q21 above and reflect the potential for additional areas requiring remediation in this section (appropriate density, potential for soil vapour impact).	No edits to text. Section 6.2 states that "Subject to the outcomes of the DSI, the remediation extent and this interim RAP may require revision."
25	Draft Interim Remedial Action Plan (Golder 2020d)	Section 7.5	Should include discussion of soil vapour and groundwater contingencies?	Minor edits to text in Section 7.3 to note that remediation options are based on preliminary investigations and may require revision (or inclusion of other media) following the DSI. Remediation contingencies included in Section 7.5 are based on current known site contamination and as such relate to remediation of asbestos in soil only. Should the DSI identify the requirement for groundwater or soil vapour remediation, the interim RAP will be updated.
26a	Draft Interim Remedial Action Plan (Golder 2020d)	Section 8.1	Setbacks that include landscaping should be screened against EILs.	Noted. Text included to state that EILs and ESLs will be applied.
26b	Draft Interim Remedial Action Plan (Golder 2020d)	Section 8.1	Should criteria for soil vapour and groundwater should be referenced noting potential requirement for site specific requirement pending depth of basement to groundwater when considering vapour intrusion risk?	No edits to text. Should the DSI identify the requirement for groundwater or soil vapour remediation, the interim RAP will be updated to include groundwater and soil vapour criteria.
27a)i	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for waste classification: Waste classification document	Refer to additional Section 9.6.
27a)ii	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for waste classification: Material source and description	Refer to additional Section 9.6.
27a)iii	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for waste classification: Sampling density, pattern, COPCs	Refer to additional Section 9.6.
27a)iv	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for waste classification: Result summary, including appropriate table with comparison to acceptance criteria	Refer to additional Section 9.6.
27a)v	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for waste classification: Waste classification	Refer to additional Section 9.6.
27b)i	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for offsite disposal works: Source location	Refer to additional Section 9.6.
27b)ii	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for offsite disposal works: Estimated volume (based on excavation size)	Refer to additional Section 9.6.
27b)iii	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for offsite disposal works: Actual volume of disposal	Refer to additional Section 9.6.
27b)iv	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for offsite disposal works: Waste classification	Refer to additional Section 9.6.
27b)v	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for offsite disposal works: Transporter	Refer to additional Section 9.6.
27b)vi	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for offsite disposal works: Final destination, PoEO licence	Refer to additional Section 9.6.
27b)vii	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for offsite disposal works: Reconciliation of waste dockets with actual disposal volume	Refer to additional Section 9.6.
27b)viii	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for offsite disposal works: Reconciliation of actual disposal volume and the estimated volume of disposal (based on excavation size)	Refer to additional Section 9.6.
27c)i	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for imported material: Volume of imported material	Refer to additional Section 9.6.
27c)ii	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for imported material: Source site	Refer to additional Section 9.6.
27c)iii	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for imported material: VENM certificate or certificate applicable for NSW EPA exemptions (e.g. ENM certificate)	Refer to additional Section 9.6.
27c)iv	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for imported material: Placement location	Refer to additional Section 9.6.
27c)v	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.2.1.1	Please note the following requirements for auditing for imported material: Transporter	Refer to additional Section 9.6.
28a	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.5	The following licence requirements should be considered: Requirement for WaterNSW licence for groundwater bore and abstraction.	Updated. Additional shallow groundwater well/s are proposed to be installed during the DSI, however, these are not anticipated to require approval from WaterNSW given that abstraction is not planned and the groundwater wells would not be installed across different aquifers. Approval / licencing may be required for dewatering during remediation works.
28b	Draft Interim Remedial Action Plan (Golder 2020d)	Section 9.5	The following licence requirements should be considered: Approval from Sydney Water for discharge of contaminated water to sewer.	Updated.
29a	Draft Interim Remedial Action Plan (Golder 2020d)	Section 10	The Interim RAP identifies additional investigation works that will inform remediation for the site. Therefore, this section would benefit from the following: Acknowledgement of additional investigation works and how this will impact the proposed activities	Updated. Refer to Section 10.1.

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29b	Draft Interim Remedial Action Plan (Golder 2020d)	Section 10	The Interim RAP identifies additional investigation works that will inform remediation for the site. Therefore, this section would benefit from the following: Step by step process outlining excavation, material tracking, disposal, validation.	Refer to Section 10.1 and Section 10.4.2. Further detail to be included in the ARCP to be prepared by the Remediation Contractor.
30a	Draft Interim Remedial Action Plan (Golder 2020d)	Section 11	Should the following be required to be included in the CEMP: Work health and safety plan?	Not included. It is assumed that the Remediation Contractor will have a standalone Health and Safety Plan.
30b	Draft Interim Remedial Action Plan (Golder 2020d)	Section 11	Should the following be required to be included in the CEMP: Remediation Schedule?	Updated.
30c	Draft Interim Remedial Action Plan (Golder 2020d)	Section 11	Should the following be required to be included in the CEMP: Hours of operation?	Updated.
30d	Draft Interim Remedial Action Plan (Golder 2020d)	Section 11	Should the following be required to be included in the CEMP: Contingency plans for site incidents (environmental and health and safety)?	Updated.
31	Draft Interim Remedial Action Plan (Golder 2020d)	Section 12.3.3	Please include a protocol for workers when a UFP is encountered.	No edits. Refer to Section 11. An unexpected finds procedure for site personnel should be included in the CEMP / ARCP and/or Health and Safety Plan.
32a	Draft Interim Remedial Action Plan (Golder 2020d)	N/A	Please include what interim management measures are required given asbestos has been detected where no hardstand cover exists.	Updated. Refer to Section 10.2
32b	Draft Interim Remedial Action Plan (Golder 2020d)	N/A	Please include discussion on staging of additional investigation, remediation and reporting as necessary.	Refer to Section 10.1