

Request for Information



8201825301-RFI-017_01-00_GMC Planning Team Contamination Details Clarification.docx

RESPONSE TO RFI

Response:	R. Kempton	Company:	Cardno	Date:	17/3/2020
Position:	Snr Project Manager				

Information Provided:

The information below addresses the query from RFI 017 and was initially provided to Goulburn Mulwaree Council in Sections 7.8 and 7.9 of the *RUG Phase 1 - Project Review* (Cardno 2018), however, was omitted from the SEE (Cardno 2020).

Analytical soil data gathered during the *Phase 1* (Cardno 2018) was screened against the adopted Site Assessment Criteria (SAC) to determine if there is an unacceptable risk to ecological receptors and/or human health under the proposed land use of ongoing commercial / industrial. Whilst the ecological SAC was exceeded in some soil samples, the exceedances are considered unlikely to present an unacceptable risk due to the absence of ecological receptors at or in close proximity to the exceedances and in consideration of a landfill cap / revegetation layer being constructed during the development (read below).

Following construction of the new RUG Facilities Cardno do not foresee significant ecological receptors interacting with soil in which contaminant concentrations were reported above the ecological SAC. The proposed development will include construction of a formal landfill cap over developed areas, in accordance with the *Solid Waste Landfill Guidelines* (NSW EPA, 2016), and for disturbed areas a revegetation layer suitable as a growth medium will be constructed, which is expected to eliminate the potential pathway for ecological exposure.

It must be noted that the Preliminary Environmental Site Investigation undertaken as part of the *Phase 1* was preliminary in nature and as such not all portions of the site proposed RUG site were assessed in sufficient detail to make a conclusive statement on the suitability of the entire site area. The following conclusions and recommendations were provided in the *RUG Phase 1 - Project Review* (Cardno 2018) that are being adopted by the project to address the observed exceedances to the SAC to manage the associated human health and ecological risks:

- > The preliminary environmental investigation identified an exceedance of the EIL SAC for benzo(a)pyrene in TP102 and copper in TP101. It is noted in the concept site model that TP101, TP102 and TP105 are located within the landfilled area and the sampled soils are near surface materials comprising the intermediate landfill cover. As such Cardno consider that there are no sensitive ecological receptors within close proximity to the contaminants identified in these soils.
- > Soils used as the intermediate cover were found to exceed the adopted ecological screening criteria, however the proposed development will comprise of the construction of a formal landfill cap, in accordance with the *Solid Waste Landfill Guidelines* (NSW EPA, 2016), whereby a revegetation layer suitable as a growth medium will be included. Therefore it can be considered that the development will involve the construction of an engineered cap over these soils, eliminating the pathway for ecological exposure
- > The presence of asbestos fines and bonded asbestos within the landfill cover soils was identified in test pit TP102 at 0.3mbgl. No evidence of ACM was noted on the surface or within the top 100mm of the surface. Any construction activities in this area involving the exhumation or drilling into the landfill cap must be conducted under appropriate occupational hygiene measures – as detailed in *SafeWork How to Manage and control asbestos in the workplace – Code of Practice* (2011) and GWMC management plans. The requirements to safely manage the potential presence of ACM materials must be incorporated in the construction tender requirements, which will feed into the construction safety management plan that will determine the requirement for further

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assessment and the appropriate control measures in line with the proposed construction methodology.

- > As noted above, the potential presence of asbestos will be communicated to workers, including those undertaking investigation and those involved with construction, so that health concerns are adequately managed.
- > An unexpected finds protocol will be developed and established by the construction contractor to ensure that unexpected finds of contamination (including asbestos) are managed in a manner that retains the health and safety of human and ecological receptors.
- > Workplace hygiene procedures associated with foundation construction in previously land fill areas containing residual waste materials will be established and included in the construction safety management plan.