Appendix G Contamination Report

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By Email: MichaelRomano@crowngroup.com.au

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Date 9/3/2016

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Ref AS121727

Dear Michael,

RE: SITE AUDIT TO SUPPORT REZONING, 7-23 AND 25-33 WATER STREET. STRATHFIELD SOUTH

As a NSW-EPA accredited Contaminated Sites Auditor, I am conducting a contamination audit in relation to the site located at 7-23 and 25-33 Water Street, Strathfield South NSW on behalf of Westport Pty Ltd (Westport) c/o Crown Group. The two properties that make up the site are owned as follows:

- 7-23 Water Street: Westport Pty Ltd
- 25-33 Water Street: R.J. Green & Lloyd Pty Ltd

Graeme Nyland of ENVIRON Australia Pty Ltd (now Ramboll Environ Australia Pty Ltd) previously prepared a Site Audit Report (SAR) and accompanying Site Audit Statement (SAS) GN271 dated 19 April 2007 regarding a Remedial Action Plan (RAP) for four properties located at Water and Dunlop Streets, South Strathfield. The four properties are located on top of a backfilled quarry and include the current site (7-23 and 25-33 Water Street) in the east. The previous SAR reviewed the investigation results across the (previously considered) four sites and provided comment on the adequacy of the investigations. The SAR reviewed and commented on the RAP which was conceptual in nature and was based on the development concept plan at the site. The SAR found that data was lacking in relation to several aspects, however, these were for the most part considered acceptable to manage during remediation, or as contingencies after remediation. The SAR identified outstanding issues with respect to investigations, remediation planning and remediation documentation (Section 11.4 of the SAR).

The **previous concept plan** was for development of all four properties, prepared by Allen Jack & Cottier (received 5 March 2007). It showed a total of

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14 blocks of two to nine storey apartments as well as open space and areas of tree planting. Basements were to be constructed across the majority of the properties, including within the filled quarry. The previous development proposed a basement level that would not intersect the groundwater table, as interference with the groundwater regime (e.g., via dewatering) was considered undesirable. Development across the properties was to be staged and may have been independent of each other.

The proposed remediation was described in the following documents:

- Report "Remedial Action Plan for 8 & 10 Dunlop Street, 7-23 & 25-33 Water Street, South Strathfield, New South Wales" dated September 2006. Prepared by Environmental & Earth Sciences NSW (EES) for Kell & Rigby
- Letter "Addendum to Remedial Action Plan for 8 & 10 Dunlop Street, 7-23 & 25-33 Water Street, South Strathfield, New South Wales" dated 22 November 2006. Prepared by EES for Kell & Rigby.

Key elements of the remediation works identified in the RAP, based on the concept plan, were as follows:

- Capping and management of the filled quarry area including installation of a landfill gas collection and extraction system comprising a perimeter vertical gas interception trench and a horizontal gas venting blanket;
- Remediation and validation of USTs, associated infrastructure and resulting tank pits;
- Implementation of a Site Management Plan during site earthworks including procedures for identification and management of any unexpected contamination; and
- Implementation of a long term Environmental Management Plan including ongoing monitoring and maintenance requirements, as well as maintenance worker protection measures following completion of the site remediation system.

The previous SAR concluded that *"…the site could be made suitable for the purpose of 'residential with minimal access to soil including high-rise apartments and flats' and 'parks, recreational open space, playing fields including secondary schools' by implementation of the remedial approach recommended by EES in their Remedial Action Plan and Addendum, subject to the following Conditions:*

- *Preparation of a detailed remedial action plan(s), specific to proposed developments, in accordance with the concepts outlined in the Remedial Action Plan dated September 2006 and Addendum dated 22 November 2006, incorporating consideration of the items listed in Section 11.4 of this Site Audit Report.*
- *Audit of the detailed remedial action plan(s) by a NSW EPA accredited contaminated sites auditor to verify the first condition.*
- *Compliance with a specific long term Environmental Management Plan, developed prior to completion of site remediation and development, in light of contamination that will remain on the site".*

I was engaged as Site Auditor for the revised development concept in June 2014. I was involved in preparation of the previous SAR and became accredited as a Site Auditor in 2010. Graeme Nyland has maintained involvement in the audit as peer reviewer.

The **current concept plan** for development applies to the eastern two properties (7-23 and 25-33 Water Street) of the four properties previously considered, and has been prepared by Robertson & Marks (plans dated 27 January 2016). The plans show five blocks of three to eight storey apartments as well as open space and areas of tree planting, largely underlain by two large basement areas. The basement areas are up to three levels deep, with two basement levels proposed within the known footprint of the filled quarry. An analysis has not been performed to determine to what depth the various basements are proposed with respect to the groundwater table. This needs to be considered in the detailed design of the development and in the remediation planning. The southern-most basement area is proposed to be two levels deep in an area that is close to the filled quarry, but not within the quarry footprint. More accurate delineation of the filled quarry boundary and assessment of landfill gas conditions in proximity to this boundary would be required if this depth of basement were to be retained in this area.

In order to be consistent with the previous RAP, the basement depth should be maintained above the level of the groundwater table within the footprint of the filled quarry. Additional investigations and remediation design would be required to support a basement of more than one level, that extended below the groundwater table within the footprint of the filled quarry. With regards to remaining issues I consider the current concept plan to be adequately consistent with the previous concept plan for the purposes of remediation planning. The previous RAP addressed the entirety of the quarry area, but now the quarry will continue offsite to the west (and partially south). However, the previous RAP contemplated development of the larger site in stages which is consistent with the current proposal. Therefore, the existing RAP documentation is considered suitable to support a rezoning application for the site with respect to the requirements of SEPP 55.

In accordance with the findings of the previous SAR, preparation of a detailed RAP is required. Douglas Partners Pty Ltd (Douglas) has been engaged by Westport with a view to undertaking any additional investigations required and preparation of the detailed RAP. I have commenced discussions with Douglas regarding the issues raised in the previous SAR and in relation to changes to the proposed development that will need to be addressed by their work. It is considered appropriate to address these issues during the detailed design stage post rezoning approval.

During the course of the audit I will review the information as it becomes available and provide comments as appropriate. I will review the works undertaken with respect to guidelines approved by the EPA under Section 105 of the NSW Contaminated Land Management Act 1997.

As required in the previous SAR, prior to any remediation I will audit the detailed RAP to confirm that the site can be made suitable for the proposed use by implementing the detailed RAP. This can be documented in a Section B Site Audit Statement or Interim Audit Advice if required. At the satisfactory completion of the remediation works, a Section A Site Audit Statement can be issued certifying that the site is suitable for its proposed use. Additional staged advice can also be provided throughout the audit in the form of Interim Advice letters if required.

Please do not hesitate to contact me if you have any questions regarding the above.

Yours sincerely
Ramboll Environ Australia Pty Ltd

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EPA Accredited Site Auditor

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