

18 December 2018

Kim Gray  
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Level 5,  
38 Humphreys Lane,  
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Via email: [Kim.Gray@sgch.com.au](mailto:Kim.Gray@sgch.com.au)

Dear Kim,

**Re: Interim Advice 2 – review of updated DGA, RAP and responses to Interim Advice 1 for 11 Gibbons Street, Redfern, NSW.**

## 1 Introduction

St George Community Housing (SGCH) 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 11 Gibbons Street, Redfern, 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 community housing, in accordance with the NSW EPA (2017) Contaminated Land Management Guidelines for the NSW Site Auditor Scheme (3<sup>rd</sup> 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 Auditor has reviewed the following reports related to land contamination assessment:

- Consulting Earth Scientists (CES) (22 November 2018) 18250\_IA1\_Auditor Review CES response;
- JBS&G (14 December 2018) Response to Interim Advice 1: Review of Existing Information for 11 Gibbons Street, Redfern, NSW.
- JBS&G (14 December 2018) Data Gap Investigation, 9-11 Gibbons Street, Redfern, NSW (Ref: 54877/1168438 Rev 3);
- JBS&G (7 December 2018b) Remedial Action Plan, 9-11 Gibbons Street, Redfern, NSW (Ref: 54877/116840 Rev 2).

The purpose of the current IA is to endorse an updated version of the RAP to address queries raised in IA1.

### 4 Summary of Remedial Strategy

The proposed remedial strategy (JBS&G, 14 December 2018) to address known contamination at the site, is as follows:

- Additional investigation to close out identified data gaps which include confirmation of the presence/absence of fuel infrastructure and characterisation of soils underlying the northern and southern building footprints.
- Upon confirmation excavation and off-site disposal of potential petroleum infrastructure including any USTs associated pipe works and former bowser plinths. Understood from anecdotal evidence to be present in the northern southern areas of the site.
- Upon confirmation excavation of tank pit backfill and associated impacted soil to the extent practicable and offsite disposal
- Excavation and offsite disposal of arsenic impacted soils identified at BH11 understood to extend into natural soils at a depth of 1.6mbgl
- Excavation and offsite disposal of impacted fill material as required to achieve proposed development subgrade levels and enable implementation of a cap/cover remedial strategy based on physical separation. It is noted based upon current development plans the entire footprint is proposed to be paved with a minimum thickness of 200mm underlain by a visual marker layer.
- Implementation of a long-term management plan to manage retained contaminated soils on site.
- The RAP presents an unexpected finds protocol as a central component to the contingency plan should additional contamination be identified during the works.

The site validation report will be prepared in accordance with the OEH 2011 Guidelines for Consultants Reporting on Contaminated Sites.



## 5 Auditor Opinion

The RAP has been reviewed in accordance with the requirements outlined in EPA (2017) Contaminated Land Management Guidelines for the NSW Site Auditor Scheme (3rd edition), OEH (2011) Guidelines for Consultants Reporting on Contaminated Sites.

Notwithstanding some inconsistencies associated with capping plans and the presence of landscaped areas as part of the proposed development, the Auditor considers the RAP to be practical and the site capable of being made suitable for the mixed commercial/residential land use.

## 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 the undersigned.

Yours sincerely,

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

**Matthew Rendell**  
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