

21 March 2006

Ref: 31-0230

Mobil Oil Australia Pty Ltd
Pegasus Centre
PO Box 484
Altona VIC 3018

Attn: Bogusia Smolenski

Dear Bogusia,

Interim Opinion Letter No. 2 – Quix Service Station, Lansvale

1 INTRODUCTION

As a NSW EPA accredited site auditor, I am conducting an audit relating to the Quix Service Station located at 161 Hume Highway, Lansvale, NSW.

I previously prepared an interim opinion letter dated 31 March 2005 to provide an opinion on the Remediation Action Plan (RAP, URS, 7 July 2003) and a subsequent RAP Addendum (3 March 2005) outlining their remediation proposal. The site is now the subject of Agreement No. 26081 dated 10 November 2006 to a Voluntary Remediation Proposal.

The scope of work for this interim letter comprised review of:

- EPA Agreement to Voluntary Remediation Proposal, Agreement No 26081 dated 10 November 2005 (the VRA)
- 'Environmental Management Plan – Construction and Commissioning of Groundwater Remediation System - Quix Service Station, 161 Hume Highway, Lansvale, NSW' Draft Report dated 2 December 2005.

The remediation system is being installed to partially fulfil Phase 2 of the Performance Schedule listed in Part 3 of the VRA. The proposed remediation system is as follows:

- A total fluids pumping and treatment system to address phase separated hydrocarbons (PSH) and dissolved phase hydrocarbons in the area of the tank pit where PSH occurs. This involves extraction of fluids from wells, removal of bitumen surfacing and excavation of trenches for installation of pipework, and effluent treatment by separation of PSH and an air stripper with liquid and vapour phase granular activated carbon (GAC)
- Delivery of oxygen via insitu Submerged Oxygen Curtain (iSOC) system in seven wells in the east and northeast edges of the site (LMW13, 14, 17 and new wells PW1, 2, 4 and 5) where there is dissolved phase diesel contamination in groundwater

Responsibility for implementation of the EMP will primarily lie with the URS project manager, though there will be an EMP management team that also contains the Construction Manager and On Site Supervisor. In my opinion the measures proposed in the EMP are able to be implemented.

Table 1 of the EMP identifies environmental risks that apply to the proposed works. The risks identified in my opinion appear consistent with the proposed works. Further pollution of groundwater by introduced organisms is not identified as a risk. Presumably the proprietary technology to be used for enhanced bioremediation (by oxygen delivery) contains no substances that could harm the groundwater quality.

Table 2 of the EMP presents the environmental measures proposed for environmental aspects and impacts. These cover the range of risks identified in Table 1. In general the control measures are adequately site specific. However, I make the following comments:

- Venting of off gases and pipe leaks are (appropriately) listed as aspects under Air Quality, but do not have a corresponding control measure. Control measures under this category relate only to dust and burning. Odours from gas venting are not considered.
- Wastes encountered during excavation are listed as an aspect under 'Waste' but do not have a corresponding control measure. Wastes that will be encountered during excavation include the bitumen surface and potentially contaminated soil.

With respect to the items listed under 'Site Management Plan' in the EPA (1997) *Guidelines for Consultants Reporting on Contaminated Sites*, the following comments are made:

Aspect	Comment
Site stormwater management plan	Includes secondary containment, and collection of rainwater that falls within treatment facility.
Soil management plan	Includes sediment control of stockpiles. Soil will be generated during trench excavation. It's proposed fate is not stated.
Noise control plan	Includes silencing devices or noise abatement enclosures for noisy equipment.
Dust control plan	Includes dust control measures .
Odour control plan	Includes deodorant for short term nuisance odours, does not address venting of gases.
Occupational health and safety plan	Not included in EMP, though it contains a Safety and Environment Checklist.

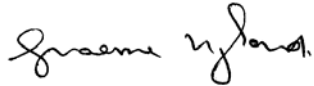
Subject to the comments above, in my opinion the EMP adequately address the environmental issues that are most likely to be relevant to the proposed remedial activities.

* * *

This opinion letter does not constitute a Site Audit Report or Site Audit Statement.

Please do not hesitate to contact me if you have any questions or comments on the above.

Yours faithfully,
ENVIRON Australia Pty Ltd

A handwritten signature in black ink, appearing to read 'Graeme Nyland'.

Graeme Nyland
EPA Accredited Site Auditor 9808