DLA environmental
ABN 36 926 003 197

Sydney
Unit 2B 30 Leighton Place
Hornsby NSW 2077
Phone: 9476 1765
Fax: 9476 1557
Email: sydney@dlaenvironmental.com.au

Maitland
42B Church Street
Maitland NSW 2320
PO Box 137
Branxton NSW 2335
Phone: 4933 0001
Email: hunter@dlaenvironmental.com.au

2nd September 2014

DL2999

Mr Matthew Twohill
Development Manager
Level 37, Chifley Tower
2 Chifley Square
Sydney NSW 2000

Dear Sir,

Re: Lot 1 DP859608, Wentworth Point Ferry Wharf, 1 Burroway Road, Sydney Olympic Park, NSW, 2127.

DLA Environmental (DLA) are writing to respond to comments from both Auburn City Council, NSW Department of Primary Industries and the NSW Planning and Environment relating to the re-development of Lot 1 DP859608, Wentworth Point Ferry Wharf, 1 Burroway Road, Sydney Olympic Park, NSW, 2127 (Site).

Auburn City Council

1. *It is noted that remediation is proposed to be 'excavate and dispose' (3 levels below ground). It is noted that remediation from all other sites within Wentworth Point is based on the cap and fill option.*

   This is an excavate and remove from site re-development, with no importation of fill materials being required. Due to the minor contamination on-site there is no real cost benefit of keeping the materials on-site.

2. *It is noted that contaminants were only found in specific hotspots. Given the extent of contamination found generally in Wentworth Point is surprising. Was the depth of the*

boreholes adequate to assess the soils to be removed for 3 levels of basement car parking?

The environmental assessment collected from twenty five (25) sample locations, this number is in accordance with the NSW EPA 1995 Sampling Design Guidelines. A total of ninety three (93) soil samples were collected representatively of each of the soil profiles. DLA have confidence that all soil profiles and depths were sufficiently assessed, the boreholes were drilled to a depth of 6m BGL. Two (2) of the three (3) locations encountered stiff red/grey mottled clays, previous geo-technical investigations indicate the clays are present below the 3 level basement. Therefore as these soils have been assessed no further investigations are required. The Site was reclaimed post industry within the area leading to very minor contamination.

3. *The RAP recommends an Environmental Management Plan be prepared. This should be included in the proposal, prior to any consent.*

   An Environmental Management Plan is included within Section 7.0 of the Remediation Action Plan issued by DLA in April 2014.

4. *It is unclear where the excavation of contaminated material would stop. What is proposed for the area of the roads? If this is cap and fill, the RAP must deal with the need for the road to include excavation from time to time.*

   The three (3) assessments undertaken by DLA have identified the contamination to be isolated locations. During remediation the excavations will be validated to confirm no residual contamination remains. If contamination is identified outside of the assessment area an Unexpected Finds Protocol will be implemented. Contamination will be cordoned off until assessed and will be removed off-site. No contaminated material will remain on-site.

5. *Groundwater entering the basement drainage area is proposed to be pumped out. This is likely to be contaminated, but has not been addressed in the proposal or associated studies. Details of measures proposed to treat this water to acceptable water quality standards are require.*

   DLA prior to any de-watering will be applying for a de-watering licence with the NSW Department of Water. Initially groundwater quality will be assessed in accordance with

NEPM 2013 as part of the licence requirements. Dependant on results, appropriate treatment requirements will be implemented.

10. *Acid Sulphate Soils, council has no knowledge of conditions which allow acid sulphate soils to 'naturally neutralise' as referred to in the proposal.*

    Underlying natural estuarine silts and clays have been shown to be acid sulphate soils, however laboratory results indicate in the majority of cases no liming is required. As the soils oxidise, sulphuric acid is released dissolving/breaking down the bivalve and mollusc shells releasing Calcium Carbonate elevating the pH levels of the soils. All estuarine silts and clays will be treated in accordance with the Acid Sulphate Soils Management Plan. Therefore if Acid Sulphate Soils are encountered during excavation they will be treated and disposed of as per the requirements of the management plan.

NSW Department of Primary Industries/NSW Office of Water

An authorisation is likely to be required for the take of groundwater associated with the proposed de-watering to construct the three (3) level basement structure. As such, standard conditions of approval likely to be applied to a part 5 licence under the Water Act 1912 authorising temporary de-watering are as follows:

a) *Clear prediction of the total volumes of groundwater likely to be dewatered, as well as detailed justification and explanation of methodologies to support the prediction.*
b) *Details of water management and disposal during de-watering operations will also be required to support the application for de-watering authorisation from the Office of Water.*
c) *Provision of a Construction Environmental Management Plan (CEMP) to address groundwater encountered.*
d) *Groundwater quality testing to be conducted prior to de-watering and ongoing testing, with reports to be supplied to the NSW Department of Water.*
e) *A copy of written permission from the relevant controlling authority shall be provided to the NSW Office of Water.*

DLA will address all NSW Department of Primary Industries/NSW Office of Water as detailed with the letter dated 24th July 2014 (OUT14/21575) within the pending de-watering application and associated documentations.

Yours faithfully

DLA ENVIRONMENTAL

Richard Bolton

Sydney Regional Manager