

10 February 2016

Amar Prashant
Mirvac
Level 26, 60 Margaret Street
Sydney NSW 2000
Via email: amar.prashant@mirvac.com

Contamination Advice - 2 Figtree Drive, Sydney Olympic Park, NSW

Dear Amar,

Mirvac Projects Pty Ltd (Mirvac, the 'client') engaged JBS&G Australia Pty Ltd (JBS&G) to provide additional environmental advice in relation to responding to comments from Sydney Olympic Park Authority (SOPA)¹ and NSW Environment Protection Authority (EPA)² on the State Significant Development (SSD) Application for a proposed redevelopment at Site 53, 2 Figtree Drive, Sydney Olympic Park, NSW (the 'site').

A response to comments relating to environmental (site contamination) matters follows based on information provided to JBS&G³.

SOPA Comments

Comment 4 (b)

JBS&G understand that Mirvac shall incorporate requirements for waste classification and disposal, including sampling and analyses requirements, in the Construction Environment Management Plan for the site. This shall include, but not be limited to:

- All waste excavated fill/soil materials generated at the site will be classified in accordance with the NSW EPA Waste Classification Guidelines (2014);
- All waste excavated fill/soil materials will be transported and disposed of to a facility that can lawfully receive that type of waste; and
- Waste excavated asbestos contaminated fill will be handled in accordance with the requirements in Part 7 of the POEO (Waste) Regulation 2014 and the Notice of Exemption from Clause 79: Reporting on transportation of asbestos waste solely within New South Wales.

Comment 4 (c)

JBS&G understand that Mirvac shall incorporate details of management of excavation seepage (if encountered) during construction in the Construction Environmental Management Plan.

¹ SSD 15_7033 – Site 53, 2 Figtree Drive, Sydney Olympic Park, letter to Department of Planning and Environment dated 25 November 2015 by Sydney Olympic Park Authority

² Mixed use development at Site 53, Sydney Olympic Park (SSD 7033) – Notice of Exhibition, letter to Department of Planning and Environment dated 9 December 2015 by NSW Environment Protection Authority

³ Copy of comments from SOPA and NSW EPA that relate to site contamination; *Phase 1 and Phase 2 Environmental Site Assessment, SOPA Site 53 2 Figtree Drive Sydney Olympic Park NSW*, 16 July 2014, JBS&G Australia Pty Ltd (JBS&G 2014).

Management (i.e. collection and discharge or disposal) of accumulated groundwater seepage (if encountered) during construction shall be in accordance with requirements in the *Protection of the Environment Operation (POEO) Act 1997*. Approval from the regulatory authority relevant to the discharge method shall be required prior to discharge of water (if required).

Approval from NSW Department of Primary Industries (Office of Water) for excavation dewatering (if required) is not considered necessary based on advice provided by Office of Water, provided dewatering (if required) is temporary and does not exceed 3 megalitres per year.

NSW EPA Comments

1. EPA Licensing and Regulation

JBS&G do not consider licensing under the *POEO Act 1997* is required for proposed contamination management activities at the site based on:

- Contaminated soil treatment is not proposed at the site; and
- Contaminated groundwater treatment (if required) will be less than 100 megalitres per year.

Activities at the site shall comply with requirements under the *POEO Act 1997*.

JBS&G understand that Mirvac shall refer to SOPA requirements (if any) for management of contamination in the Construction Environmental Management Plan.

4. Water Quality Targets / Underground Car Park

The potential for groundwater seepage is expected to be low based on a geotechnical investigation (DP, 2014)⁴ which reported:

- “Regional groundwater table is expected to be below the bulk excavation level. However, some seepage through and along strata boundaries should be expected...”; and
- The presence of residual clays and saturated soils comprising laminite and shale. These geology are typically of low hydraulic conductivity and are expected to produce low seepage rates.

JBS&G understand that the proposed basement design incorporates an appropriate seepage collection and management system that will prevent pollution of waters. This includes a seepage collection system including sub-floor drainage to a collection point. Collected water (if any) shall be managed via discharge of water shown to be of suitable quality and approved by the regulatory authority relevant to the discharge method.

5. Waste Management

JBS&G understand that Mirvac shall incorporate requirements for waste classification and disposal, including sampling and analyses requirements, in the Construction Environment Management Plan for the site. This shall include, but not be limited to:

- All waste excavated fill/soil materials generated at the site will be classified in accordance with the NSW EPA Waste Classification Guidelines (2014);
- All waste excavated fill/soil materials will be transported and disposed of to a facility that can lawfully receive that type of waste; and
- Waste excavated asbestos contaminated fill will be handled in accordance with the requirements in Part 7 of the POEO (Waste) Regulation 2014 and the Notice of Exemption

⁴ Report on Geotechnical Investigation, Proposed Site 53 Redevelopment, 2 Figtree Drive Sydney Olympic Park, August 2014, Douglas Partners (DP 204)

from Clause 79: Reporting on transportation of asbestos waste solely within New South Wales.

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email awoinarski@jbsg.com.au.

Yours sincerely:

A handwritten signature in black ink, appearing to read 'A. Woinarski', with a long horizontal stroke extending to the right.

Andrei Woinarski
Principal
JBS&G Australia Pty Ltd

Attachments:
(1) Limitations

Attachment 1– Limitations

This report has been prepared for use by the client who has commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the client and other parties.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by JBS&G, and should not be relied upon by other parties, who should make their own enquires.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements.

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Ground conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.