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17 November 2025

Akalan Projects P/L
Mr Raphael Pullin
rpullin@akalan.com.au

SUBJECT: Interim Audit Advice #3

SITE: St George Private Hospital Expansion

Dear Raphael,

I write in my capacity as the appointed NSW EPA Accredited Site Auditor (#1501) to provide this Auditor's Advice Letter in support of the SEARs application for the proposed St George Private Hospital Expansion. The site comprises 119–129 Princes Highway, 2 Hogben Street and 1 South Street, Kogarah, with a combined area of approximately 2,200 m². The existing site currently includes a sealed car park and a commercial building, and the proposed development involves construction of a multi-storey hospital with five-levels of basement parking.

I have reviewed the following documents prepared by Tetra Tech Coffey:

- Preliminary Site Investigation, Report Ref: 754-SYDGE381816-R01-Rev3, dated 20 October 2025.
- Detailed Site Investigation, Report Ref: 754-SYDGE381816-R02-Rev3, dated 10 November 2025.
- Interim Remediation Action Plan, Report Ref: 754-SYDGE381816-R03.Rev 2, dated 10 November 2025
- Groundwater Impact Assessment, Report Ref: SYDGE381816AB, dated 22 October 2025.

The audit review outcomes provided in Interim Advice Letters #1 and #2 have been satisfactorily addressed in the revised documentation.

Detailed Site Investigation

The DSI identified no significant soil contamination within the accessible portions of the site, with all reported concentrations below the adopted health investigation criteria. The drilling method was not optimal for asbestos detection, but no asbestos was observed. Formaldehyde was detected in groundwater at elevated concentrations, with trace detections of chloroform and carbon disulphide, triggering the need for additional assessment of potential human-health risks during excavation and within the completed basement areas. The southern building footprint remains to be investigated following demolition.

Remediation Action Plan

The RAP proposes excavation and off-site disposal, which aligns with the basement construction methodology and will achieve site remediation concurrently with development. The RAP provides clear procedures for waste classification, off-site disposal, and validation.

Uncertainty remains regarding the risk posed by formaldehyde in groundwater. The RAP manages this uncertainty by:

- requiring additional groundwater assessment prior to construction
- undertaking modelling to determine whether formaldehyde presents an unacceptable vapour intrusion risk to future site users
- acknowledging the engineering and building controls that may be required to mitigate any identified vapour risk
- committing to refining the RAP in response to new data.

I concur with the RAP in its current form. Vapour-intrusion protection measures are well-established, widely implemented, and would not represent a significant impost to the proposed development should such controls ultimately be required. On this basis, and with the assurance that the RAP contains defined mechanisms for ongoing Auditor engagement and approval of any refinements, I am satisfied to endorse the RAP.

The site is considered capable of being rendered suitable for the intended land use, subject to full implementation of the RAP and incorporation of findings from the additional groundwater assessment.

Going forward, the consultant is to undertake the following:

- Prepare a Sampling and Analysis Quality Plan (SAQP) outlining the scope and methodology for the required additional assessments.
- Following completion of the additional assessment, provide a data-gap investigation report and a Human Health Risk Assessment (HRA) clearly defining any identified risks.
- Revise the RAP as necessary, based on the outcomes of the additional investigations and the HRA, to ensure any complete exposure pathways are appropriately mitigated.

All of the above deliverables are to be submitted to the Site Auditor for review and approval via Interim Audit Advice prior to any ground excavation commencing.

Please contact me if you require any clarification.

Yours sincerely,



David Gregory
NSW EPA Accredited Site Auditor (#1501)
Geo-Logix Pty Ltd

Limitations

This interim advice is limited to Audit review of the subject reports. It does not constitute a site audit report or statement, nor does it pre-empt the conclusions to be drawn at the end of the site audit process.