

18 June 2020

Karissa Kendall  
Project Director | Infrastructure Delivery, Major Projects  
Level 1, 1 Oxford Street, Darlinghurst, NSW 2010  
C/o  
Justine Newby Senior Project Manager  
Level 19, 9 Hunter Street, Sydney NSW 2000  
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Dear Karissa,

**Re: Interim Audit Advice No. 1**  
**Proposed Remediation – Upper Fort Street, Observatory Hill, Millers Point**  
**NSW**

## 1. Introduction

As a NSW Environmental Protection Authority (EPA) Accredited Contaminated Site Auditor, I have been engaged by Schools Infrastructure to conduct a site audit in relation to the site identified as proposed Lot 2 DP 244444, Lots 2, 3, 4 and 9 DP 732592, Lots 106, 107 and 108 DP 748340 and Lot 5 DP 258013 at Upper Fort Street, Observatory Hill, Millers Point NSW, in accordance with the Contaminated Land Management Act 1997 (NSW) (the Act) and relevant guidelines made or approved under s105 of that Act.

It is understood that Department of Planning, Industry and Environment (DPIE) invited the NSW Environmental Protection Authority (EPA) to provide advice on the EIS and include recommendations for conditions of approval for the development.

Item No. 58 of the EPA recommendations requires that:

*‘Given that remediation is a likely requirement, the applicant will need to engage an EPA-accredited Site Auditor for the duration of the construction works to ensure that any works in relation to soil or groundwater contamination are appropriately managed. This should be done as soon as possible.’*

The ultimate objective of the site audit is to provide a Site Audit Report and Site Audit Statement certifying whether in the Auditor’s opinion, in relation to contaminated land, the site is suitable for the proposed educational land use.

This interim audit advice is provided to assist in the progress of the site audit. This interim advice does not constitute a Site Audit Statement or a Site Audit Report, nor does it pre-empt the final site audit conclusion. A Site Audit Statement will be issued at the end of the audit process.



## 2. Background

The site is located within the City of Sydney area and occupies an area of approximately 5,700 m<sup>2</sup>. It is understood that the site is currently occupied by a primary school. Historical information indicates that the site has been used as a school since the early 1940's. It is understood that the site is to remain an educational land use with the redevelopment of buildings and facilities onsite.

JBS&G identified potential contaminating activities including imported fill of unknown origin, hazardous building materials from former and current structures and heavy vehicle usage adjacent to the site. JBS&G found that fill has been impacted by metals, petroleum hydrocarbons and asbestos. Remediation of the fill was required through the cap and containment onsite of impacted fill.

## 3. Document Review

The following updated documents have been provided to the auditor for consideration as part of this site audit in response to IAA01.

*'Schools Infrastructure New South Wales c/o Johnstaff Projects Pty Ltd, Fort Street Public School Detailed Site Investigation, Upper Fort Street, Observatory Hill, Millers Point, NSW'* dated 9 August 2019 by JBS&G Australia Pty Ltd (JBS&G).

*'Schools Infrastructure New South Wales c/o Johnstaff Projects Pty Ltd, Remedial Action Plan, Fort Street Public School Detailed Site Investigation, Upper Fort Street, Millers Point, New South Wales'* dated 14 October 2019 by JBS&G.

I undertook a site visit on the 18 June 2020 to become familiar with the current site conditions.

## 4. Auditor Comments

It is considered that the remediation approach recommended by JBS&G is appropriate subject to detailed comments below.

### Main Comments

- Please ensure capping depths are consistent with standard practice i.e. 0.5 m grasses/shrubs and 1.2 m for trees.
- An asphalt layer was noted in five locations (only two were sampled and submitted for analysis) that is associated with particularly elevated concentrations of total polycyclic aromatic hydrocarbons (PAHs). Please confirm that this layer will be segregated from the fill material during earthworks and disposed off-site.
- Fill encountered at TP1B appears in consistent with other fill material over the site and is reporting particularly elevated concentrations of PAHs. Consideration should be given to segregating this material for off-site disposal.

### Detailed Comments

#### *Detailed Site Investigation*

Section 2.2. Please note location of garage within the site and provide description of contents.

Section 2.3. A fire station is located south of the site, please discuss any potential impacts from PFAS in substances possibly used at the first station.

Section 2.7. Please discuss likely groundwater flow direction (include within RAP as well)

Section 6.3. Laboratory analysis in Table 6.3 states OPPs were analysed for however these results are not included in Table A, please clarify.



## Remedial Action Plan

### Section 5.5.2.

- Capping designated for pavers only appropriate where the pavers cannot be lifted.
- Capping proposed in landscaped areas is inappropriate i.e. 0.1-0.2 grasses and shrubs should be 0.5 m and 0.7 m for trees should be 1.2 m (subject to tree types proposed).

Section 6.2.6.1. A survey plan of the marker layer level and final surface levels is to also be provided to allow for assessment of capping layer depth. The survey plan showing the extent of the capped fill should also show the containment area in relation to the site boundary.

Section 6.2.6.2. The consultant should inspect any imported VENM at the source site and upon arrival at the site to ensure material complies with POEO Act 1997 for VENM. Adequately source documentation must include sampling and analysis for the analytes outlined in Table 6.2. Please also analysis for OCP and PCBs in waste classification assessments.

Please provide a survey plan of the site boundary coordinates within the validation report.

Prior to the commencement of excavation works, a VENM assessment of the natural soil and bedrock, and a waste tracking register to be used during development, must be provided for the Auditors review.

## 5. Closure

If you have any comments or questions, please do not hesitate to contact the undersigned at [melissa.porter@senversa.com.au](mailto:melissa.porter@senversa.com.au) or via mobile on 0402537759.

Yours sincerely,

**Melissa Porter**

NSW EPA Accredited Auditor 0803

MP/ES

**Technical Limitations and Uncertainty** – JBS&G Australia Pty Ltd included limitations in their reports. The Interim Audit Advice must also be subject to those limitations. The Auditor has prepared this document in good faith but is unable to provide certification outside of areas over which the Auditor had some control or is reasonably able to check. The Auditor has relied on the documents referenced in preparing the Auditors' opinion. If the Auditor is unable to rely on any of those documents, the conclusions of the audit could change. It is not possible in a Site Audit Report to present all data which could be of interest to all readers of this report. Readers are referred to the referenced reports for further data. Users of this document should satisfy themselves concerning its application to, and where necessary seek expert advice in respect to, their situation.

This Interim Advice is not a Site Audit Report or a Site Audit Statement, as defined in the Contaminated Land Management Act 1997, but forms part of the Site Audit process. It is intended that a Site Audit Statement and report will be issued at the completion of the site audit. Consistent with NSW EPA requirements for staged "sign-off" of sites that are the subject of progressive assessment, remediation and validation, the Auditor is required to advise that:

- This site audit advice does not constitute a site audit report or statement.
- This letter is considered by the Auditor to be consistent with NSW EPA guidelines and policies.
- This letter will be documented in the final Site Audit Statement and associated documentation.
- At the completion of the site audit, a Site Audit Statement will be prepared, for the consent agency to include the Site's property information, held by the local council.

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19 June 2020

Karissa Kendall  
Project Director | Infrastructure Delivery, Major Projects  
Level 1, 1 Oxford Street, Darlinghurst, NSW 2010  
C/o  
Justine Newby Senior Project Manager  
Level 19, 9 Hunter Street, Sydney NSW 2000  
newby.j@rootpartnerships.com.au

Dear Karissa,

## **Re: Interim Audit Advice No. 2**

### **Proposed Remediation – Upper Fort Street, Observatory Hill, Millers Point NSW**

#### **1. Introduction**

As a NSW Environmental Protection Authority (EPA) Accredited Contaminated Site Auditor, I have been engaged by Schools Infrastructure to conduct a site audit in relation to the site identified as proposed Lot 2 DP 244444, Lots 2, 3, 4 and 9 DP 732592, Lots 106, 107 and 108 DP 748340 and Lot 5 DP 258013 at Upper Fort Street, Observatory Hill, Millers Point NSW, in accordance with the Contaminated Land Management Act 1997 (NSW) (the Act) and relevant guidelines made or approved under s105 of that Act.

It is understood that Department of Planning, Industry and Environment (DPIE) invited the NSW Environmental Protection Authority (EPA) to provide advice on the EIS and include recommendations for conditions of approval for the development.

Item No. 58 of the EPA recommendations requires that:

*‘Given that remediation is a likely requirement, the applicant will need to engage an EPA-accredited Site Auditor for the duration of the construction works to ensure that any works in relation to soil or groundwater contamination are appropriately managed. This should be done as soon as possible.’*

The ultimate objective of the site audit is to provide a Site Audit Report and Site Audit Statement certifying whether in the Auditor’s opinion, in relation to contaminated land, the site is suitable for the proposed educational land use. This interim audit advice is provided to assist in the progress of the site audit. This interim advice does not constitute a Site Audit Statement or a Site Audit Report, nor does it pre-empt the final site audit conclusion. A Site Audit Statement will be issued at the end of the audit process.

#### **2. Background**

The site is located within the City of Sydney area and occupies an area of approximately 5,700 m<sup>2</sup>. It is understood that the site is currently occupied by a primary school. Historical information indicates that the site has been used as a school since the early 1940’s. It is understood that the site is to remain an educational land use with the redevelopment of buildings and facilities onsite.



JBS&G identified potential contaminating activities including imported fill of unknown origin, hazardous building materials from former and current structures and heavy vehicle usage adjacent to the site. JBS&G found that fill has been impacted by metals, petroleum hydrocarbons and asbestos. Remediation of the fill was required through the cap and containment onsite of impacted fill.

### 3. Document Review

I undertook an initial review of available historical reports and the draft remedial action plan. Comments and requests for clarification auditor were presented in Interim Audit Advice (IAA) #01 dated 18 June 2020. A site visit was undertaken on 18 June 2020. The consultant JBS&G has provided a response to these comments in addition to updated Remedial Action Plan:

- ‘Schools Infrastructure New South Wales. Remedial Action Plan, Fort Street Public School, Upper Fort Street, Millers Point, New South Wales’ dated 19 June 2020 by JBS&G Australia Pty Ltd (JBS&G) (RAP).

### 4. Auditor Comments

I have undertaken a review of the updated RAP and consider that the comments in IAA No. 1 have been satisfactorily addressed. I conclude that the site can be made suitable for the proposed primary school education facility subject to implementation of the RAP (JBS&G, 19 June 2020), successful validation and implementation of a long-term environmental management plan.

### 5. Closure

If you have any comments or questions, please do not hesitate to contact the undersigned at [melissa.porter@senversa.com.au](mailto:melissa.porter@senversa.com.au) or via mobile on 0402537759.

Yours sincerely,

**Melissa Porter**

NSW EPA Accredited Auditor 0803

MP/ES

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