

25 October 2012

NSW Dept Planning & Infrastructure
Attn: Chris Ritchie

Sent via Email: chris.ritchie@planning.nsw.gov.au

Dear Chris,

RE: Pasminco and Incitec Consolidated Remediation – Pasminco (06_0184 Mod 4) & Incitec (08_0221 Mod 1)

Thank you for your letter (Ref: 10/21869) which I received on 8 October 2012, inviting me to make a written submission on the Environmental Assessment (combined EA) for the proposed consolidated remediation of the above projects.

I provide my comments below:

Containment Cell Design

The final containment cell design for the Pasminco site was previously approved by contaminated sites auditor Dr Bill Ryall in the following audit report:

- ENSR/AECOM (2008) Site Audit Report & Site Audit Statement, Review of Final Containment Cell Design, Pasminco Cockle Creek Smelter, 13a Main Road, Boolaroo NSW Ref: S40605_SAR_FinalCellDesign_27Feb08, dated 28 February 2008.

As part of this site audit, Dr Ryall engaged an expert support team member to review the engineering design specifications.

Subsequent to this review, a section 75w modification was approved (10 August 2012) for changes to the cap design. This approval (06_184 Mod3) requires that a “cap report” must be prepared at the completion of the cell. The “cap report” is to be reviewed by a site auditor who shall issue a site audit statement and site audit report on the suitability of the containment cell cap and associated infrastructure to meet the remediation objectives.

I note that the combined EA includes a “draft concept design report” for the expansion of the containment cell prepared by Golder. Within this report Golder concludes that *“the components of the containment cell are either not affected or only affected in a minor and acceptable way by the expansion design. Required changes are considered feasible and relatively minor and will be further developed during the detailed design of the cell expansion.”* This is consistent with my understanding of the proposed changes.

Audit of engineered cell design is beyond the scope of a contamination “site audit” and I do not have the relevant qualifications and experience to undertake such a review. Based on my understanding of the proposed changes, they appear to be minor in relation to the previously approved design. Should further engineering review be considered necessary, it should be by an “independent engineering certifier”, being an experienced civil or geotechnical engineer with experience in the design and construction of landfills.

Surface Water and Groundwater Modelling

It is reasonable to incorporate the Incitec groundwater monitoring strategy into the Pasminco remediation program, noting that final approval of the groundwater monitoring will be through

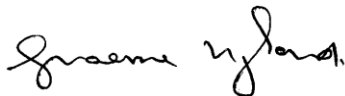
review of the "groundwater monitoring and management plan" (GMMP) which will require review as part of my audit.

Validation of Remediation Works

The same validation criteria and approvals that apply to the Pasminco site will be applied to the Incitec site. I note that final validation sampling across the Incitec site must reflect the site history of the Incitec site. As part of my audit I will review a Remediation Action Work Plan for the Incitec site. This is the same process that has been followed for the Pasminco site.

Yours faithfully,

ENVIRON Australia Pty Ltd

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

Graeme Nyland

NSW EPA Accredited Site Auditor 9808