

10 February 2021

Fabcot Pty Ltd
1 Woolworths Way
Bella Vista NSW 2153

Attn: Michael Rumble

By email: mrumble@woolworths.com.au

Dear Michael

RE: INTERIM AUDIT ADVICE LETTER NO. 3 - REMEDIATION ACTION PLAN, 11-13 PERCY STREET, AUBURN NSW

Ramboll Australia Pty Ltd
Level 3, 100 Pacific Highway
PO Box 560
North Sydney NSW 2060

T +61 2 9954 8100
www.ramboll.com

Ref 318000944

1. INTRODUCTION

As a NSW Environment Protection Authority (EPA) accredited Contaminated Sites Auditor, I am conducting an Audit in relation to the site located at 11-13 Percy Street, Auburn NSW, identified as Lots 1 and 2 in DP1183821 (Attachment 1). The audit has been commissioned by Fabcot Pty Ltd (Fabcot) who propose to develop the site as a Woolworths Customer Fulfilment Centre (CFC) which will comprise a single storey warehouse and distribution centre for online sales. The audit is a non-statutory audit.

This interim audit advice (IAA No. 3) letter provides an independent review of a Remediation Action Plan (RAP) which has been prepared for the site:

- 'Remediation Action Plan, 11-13 Percy Street, Auburn, NSW 2144' dated 4 February 2021, Geo-Logix Pty Ltd (Geo-Logix) (*the RAP*)

2. PREVIOUS INTERIM AUDIT ADVICE

Previously, I have prepared two interim advice letters. An initial advice, dated 11 May 2020 (IAA No. 1), was prepared to provide an independent review of the suitability and appropriateness of environmental investigations undertaken at the site up until that date and provide recommendations for any additional actions required to make the site suitable for the proposed commercial/industrial use. The reports reviewed were:

- 'Phase 1 & 2 Environmental Site Assessment, 11-13 Percy Street, Auburn, NSW' dated 14 January 2000, OTEK Australia Pty Ltd (OTEK).
- 'Stage 1 & 2 Environmental Site Investigation, 11-13 Percy Street, Auburn, NSW' dated 12 June 2012, WSP Pty Ltd (WSP).

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- 'Detailed Site Investigation Report, 11-13 Percy Street, Auburn, NSW' dated 22 November 2019, Geo-Logix Pty Ltd (Geo-Logix) (*the DSI*).

IAA No. 1 identified data gaps that were to be addressed to further characterise the contamination status of the site and confirm site suitability. The recommendations included in IAA No.1 were:

1. *"Additional assessment to confirm that there is no on-site source of [trichloroethylene] TCE in the vicinity of well MW102.*
2. *Additional assessment of the potential vapour intrusion risk to on and off-site receptors from chlorinated hydrocarbon concentrations in groundwater on-site. The assessment should include the potential for preferential pathways for vapour migration and temporal considerations.*
3. *Preparation and implementation of a Remediation Action Plan (RAP) outlining the removal and validation of the identified [underground storage tanks] USTs and the [asbestos containing material] ACM identified at the site surface and in shallow soils by Geo-Logix. The RAP should also consider the need for further groundwater characterisation in the vicinity of the abandoned UST should residual contamination be observed during remediation of the USTs. The RAP should include an inspection process during removal of hardstand to assess for any unidentified sources of contamination.*
4. *Any material being removed from site should be classified for off-site disposal in accordance the EPA (2014) Waste Classification Guidelines.*
5. *Any material being imported to the site should be assessed for potential contamination in accordance with NSW EPA guidelines as being suitable for the intended use or be classified as VENM.*
6. *Preparation of a final site validation report by a qualified environmental consultant, certifying the suitability of the site for the proposed development.*
7. *Preparation of an Environmental Management Plan (EMP) for the management of any contamination remaining on site following the redevelopment that presents a risk to human health or the environment."*

Fabcot engaged Geo-Logix to undertake an additional soil vapour assessment and groundwater monitoring event to address recommendations 1 and 2 above. The results of these investigations were documented in the following reports:

- 'Soil Vapour Investigation Report, 11-13 Percy Street, Auburn, NSW' dated 21 July 2020, Geo-Logix (*the soil vapour investigation*).
- 'Groundwater Monitoring Event, 11-13 Percy Street, Auburn, NSW' dated 29 July 2020, Geo-Logix (*the May 2020 GME*).

IAA No 2, dated 7 August 2020, provided comments on the additional investigation reports. In the IAA, I concluded that *"I am in general agreement with the conclusions of the soil vapour investigation drawn by Geo-Logix. These are that:*

- *The source of the chlorinated hydrocarbon impact in groundwater appears to be from a source upgradient of the site to the east or south-east and that the soil vapour plume resulting from the groundwater impact is generally delineated in the south-eastern portion of the site.*
- *Based on the proposed development design, there is no complete exposure pathway to future commercial site occupants from vapour inhalation pathways.*
- *There is a potential vapour intrusion risk to subsurface maintenance or construction workers in a localised area within the south-eastern portion of the site from vapour inhalation.*

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- *The indoor inhalation risk to occupants of the commercial building to the north of the site on 15 Percy Street is incomplete."*

The IAA No 2 recommended preparation of a RAP to address ACM that has previously been identified at the site and the potential for additional underground tanks or other unexpected finds to be encountered during the redevelopment.

3. PROPOSED DEVELOPMENT

The site is to be redeveloped by Fabcot as a distribution centre for online sales. The development is to comprise a single-story warehouse across most of the site footprint (occupying approximately 16,200 m²) with truck and car parking to the east, south and west of the warehouse.

The eastern portion of the building extends across the lower area of the site currently occupied by the building undercroft, car parking area and wash bay. Due to this portion of the site being a flood zone, the building across this area is proposed to be constructed on a suspended slab. The area below the suspended slab is to an open and unoccupied area. The design plan is provided in Attachment 2.

For the purposes of this audit, the 'commercial/industrial' land use scenario will be assumed.

4. EVALUATION OF CONCEPTUAL SITE MODEL

A conceptual site model (CSM) is a representation of the contaminant source, pathway and receptor linkages at a site. Geo-Logix developed a CSM during the initial site investigations and developed it iteratively throughout the site assessments to inform decisions around the required remediation and management. Table 4.1 provides the Auditors review of the CSM included in the RAP.

Table 4.1: Review of the Conceptual Site Model

Element of CSM	Consultant	Auditor Opinion
Contaminant source and mechanism	Geo-Logix do not specifically identify the contaminant sources and mechanism within the CSM, however, during the DSI Geo-Logix undertook a review of site history and identified contaminants related with potential site activities, including use of the site for the manufacture of white goods, and plastic packaging, USTs, ASTs and vehicle maintenance, uncontrolled filling of the site and neighbouring land uses. Following the DSI, Geo-Logix inferred the source of the TCE and its degradation products was the off-site former printing facility to the south-east of the site and that chlorinated hydrocarbons were migrating on to the site in groundwater within the alluvial sediments of the former creek channel that underlies the site.	Sources of potential contamination have been identified during historical site investigations. The source of the chlorinated hydrocarbons (TCE and its degradation products) detected in groundwater in the eastern portion of the site is uncertain. The chlorinated hydrocarbon contamination in groundwater and soil vapour has been delineated on-site and indicates the source of the impact is likely to be off-site to the south-east.
Affected media	Soil, soil vapour and groundwater	The affected media have been identified.
Receptor identification	Geo-Logix identified the following potential receptors: <ul style="list-style-type: none"> • On-site commercial users • On-site construction workers • On-site maintenance/trench workers • Neighbouring site users • Groundwater 	The identified receptors are appropriate.

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Element of CSM	Consultant	Auditor Opinion
	<ul style="list-style-type: none"> Recreational users of surface water Aquatic ecosystems in Haslams Creek and Parramatta River 	
Exposure pathways	<p>Identified exposure pathways considered in the CSM included:</p> <ul style="list-style-type: none"> Soil ingestion, dermal contact and dust inhalation Inhalation of vapours in indoor air and outdoor air derived from soil and groundwater Leaching of contaminants from soils to groundwater Abstraction of groundwater Discharge of contaminated groundwater to surface water <p>Exposure to terrestrial ecology is considered incomplete due to hardstand limiting soil access across the site. Exposure to groundwater from abstraction and exposure to surface water receptors (recreational and aquatic ecosystems) are identified as being incomplete or not relevant.</p>	<p>The considered exposure pathways are appropriate, however there is no rationale provided by Geo-Logix for considering the exposure pathway to surface water as incomplete. The Auditor notes that chlorinated hydrocarbon impacts in groundwater have been delineated down gradient to the north-east but are present in one well (MW104) in the north-eastern corner of the site at concentrations below the adopted groundwater investigation level for protection of aquatic ecosystems. The risk to aquatic ecosystems in off-site surface water receptors is therefore considered to be low.</p> <p>Abstraction of groundwater on-site for beneficial use is not proposed under the current or future site use.</p> <p>The vapour intrusion exposure pathway to current and future users of a commercial building is considered incomplete as the development design overlying the groundwater contaminant plume comprises building on a suspended slab such that vapours are vented before entering the building. Vapour intrusion is a potential exposure pathway for subsurface workers.</p>
Presence of preferential pathways for contaminant movement	<p>Geo-Logix acknowledges the potential for the infilled creek to act as a preferential pathway for groundwater migration and the presence of peat layers in the alluvial sediments that may act as stores of TCE enabling back diffusion of VOCs into groundwater.</p> <p>The potential for vapour intrusion into future subsurface service trenches is identified.</p>	<p>While it is identified that the infilled creek is likely to provide a preferential pathway for groundwater flow, the Auditor considers that the potential for groundwater contamination to migrate through this pathway has been adequately assessed during the site investigations.</p> <p>The Auditor agrees that the potential for vapour intrusion into service trenches requires further assessment or management.</p>
Evaluation of data gaps	<p>The potential vapour intrusion risk to trench workers is identified as a data gap.</p> <p>The potential for buried areas of asbestos to be present on the site is identified as requiring further investigation to confirm if any management or remediation is required.</p> <p>Validation of soils under building footprints and hardstand through visual inspection for ACM and potential unidentified sources of contamination is proposed to address this data gap.</p>	<p>In addition to the identified data gaps, the need for additional groundwater assessment in the area of the UST should be assessed following tank removal based on visual assessment and validation sampling results.</p>

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Element of CSM	Consultant	Auditor Opinion
Potentially complete source-pathway-receptor (SPR) linkages	<p>Geo-Logix identify the following potentially complete exposure scenarios:</p> <ul style="list-style-type: none"> Construction worker exposure to bonded asbestos during site redevelopment Trench worker exposure to asbestos during operation of the site Trench worker inhalation of TCE vapour emanating from groundwater while completing sub surface maintenance works. 	<p>The identified complete SPR linkages are appropriate.</p> <p>In addition, there is a potential for off-site receptors to be impacted by asbestos dust during the redevelopment and for construction workers to encounter groundwater impacted by chlorinated hydrocarbons should intrusive works intercept groundwater in the south-eastern portion of the site.</p>

Auditor's Opinion

The Auditor is of the opinion that the CSM is acceptable for the purposes of remedial planning and is a reasonable representation of the contamination at the site. The Auditor considers the following:

- The proposed development plans indicate that construction of the warehouse in the eastern portion of the site where the chlorinated hydrocarbon plume is located will be on a suspended slab, which will mitigate any vapour intrusion risk to future commercial site users within the building. Soil vapour assessment across the remainder of the site indicates a low risk of vapour intrusion in areas where slab on grade construction will occur. The vapour intrusion risk to subsurface construction and maintenance workers requires further assessment or management.
- Additional characterisation of fill is required to confirm the potential risk to construction workers and future site users from ACM in fill and a visual inspection of surface soils under buildings and concrete slabs is to be undertaken during the development to assess for ACM in fill and other sources of contamination.
- The proposed development plans indicate that there will be limited vegetation and plantings of trees across the site, indicating that the ecological risks to plants across the site as part of the proposed development are low.
- There is potential for interaction with shallow groundwater in the eastern portion of the site during site development. Concentrations of chlorinated hydrocarbons in groundwater in the south-eastern portion of the site may present a risk to human health or the environment and should be managed appropriately during site development.

5. EVALUATION OF PROPOSED REMEDIATION

5.1 Remediation Required

Geo-Logix determined remedial requirements based on review of investigation results against screening criteria and consideration of aesthetic issues. The Auditor has summarised the issues identified as requiring remediation and the preferred options considered in the RAP in Table 5.1.

An unexpected finds protocol and a program of sampling is included in the RAP that will address fill materials potentially contaminated by ACM and soils underlying current buildings and concrete slabs. The location of surface ACM, suspected ACM in fill and the potential UST are shown on Figure 6 in the RAP included as Attachment 3 of this letter.

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Table 5.1: Remediation Required and Preferred Options

Description	Extent of Remediation/Management Required	Preferred Options
Bonded ACM at the site surface	Removal of surface ACM identified: <ul style="list-style-type: none"> On the ground surface of the berm along the eastern site boundary In a stockpile of waste materials and waste filled pit in the undercroft area in the south-east of the site On the surface of the northern entrance driveway Areas identified on Figure 6 in RAP	Handpicking and disposal of ACM off-site Disposal of waste stockpiles off-site
Asbestos Contaminated Soil	Asbestos has been detected in fill materials in the north-western and western portions of the site. Additional characterisation of this material is proposed through test pitting and sampling. Soils impacted with asbestos above the remediation acceptance criteria (RAC) to be remediated and validated. Areas identified on Figure 6 in RAP	Characterisation of fill materials through test pitting Remediation of ACM impacted fill through off-site disposal
Potential UST in central portion of the site	Location based on GPR survey and identified on Figure 6 in RAP	Decommissioning by removal and validation
Unexpected finds (UF) including more extensive ACM impacts.	Surface inspection following removal of concrete slabs Inspection of ground surface on 2m transects beneath removed concrete slabs and buildings and investigation of suspect soil or fill with an excavator	Off-site disposal of impacted soils
Chlorinated hydrocarbons (TCE and its degradant products) in groundwater and soil vapour beneath the south-eastern portion of the site	Management to protect construction and maintenance workers undertaking subsurface works from potential vapour inhalation risk.	Implementation of a construction phase and operational phase Environmental Management Plans detailing Work Health and Safety measures for trench workers who may be exposed to TCE and its degradant products.

Auditor's Opinion

The identified remediation extent and proposed remedial options are considered appropriate for the known contamination. It is noted that a site specific tier 2 assessment of the vapour intrusion risk posed to construction and intrusive maintenance workers from the chlorinated hydrocarbons in groundwater has not been undertaken. However, based on the vapour concentrations reported during the DSI, management of vapour intrusion risk to intrusive subsurface workers through implementation of an EMP is considered an acceptable approach to managing the potential risk.

The additional characterisation of fill for ACM and the implementation of a visual surface inspection protocol is appropriate to assess conditions under buildings and concrete slabs during the development. It is noted that the RAP does not include a contingency remediation strategy should the results of the fill characterisation and surface inspection indicate a larger than anticipated volume of soil requiring remediation. Any changes to the proposed remediation works as a result of the additional characterisation and surface inspection should be reviewed by the Auditor. A Remedial Works Plan or an amended RAP may be required to document the changes.

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5.2 Evaluation of RAP

The Auditor has assessed the RAP by comparison with the checklist included in NSW EPA (2020) *Consultants Reporting on Contaminated Land*. The RAP was found to generally address the required information, as detailed in Table 5.2 below, except as noted in Auditor comments.

Table 5.2: Evaluation of Remedial Action Plan

Remedial Action Plan	Auditor Comments
<p><i>Remedial Goal</i></p> <p>That the site is suitable for ongoing commercial/industrial use. Objectives of the RAP include:</p> <ul style="list-style-type: none"> – Define Areas of Environmental Concern (AEC) and Contaminants of Potential Concern (COPC); – Evaluate remedial options in consideration of site conditions, logistical constraints and commercial objectives; – Define Data Quality Objectives (DQOs) and Remediation Acceptance Criteria (RAC) to ensure the remediated site will be suitable for the proposed use and will not present an unacceptable risk of harm to human health or the environment; – Define remediation procedures and methodologies; – Define remediation validation methodology; – Establish environmental safeguards so that remediation is undertaken in an environmentally acceptable manner; and – Define Work Health and Safety (WHS) requirements to protect site workers undertaking site remediation. 	<p>In the Auditor's opinion, the remediation goal and objectives are appropriate.</p>
<p><i>Discussion of the Extent of Remediation Required</i></p> <p>Remediation required for each area was discussed within the RAP (See Table 5.1 above). It is noted that while the proposed additional characterisation of fill in two areas of the site for ACM is outlined in the RAP, this management action is not listed in Section 7 of the RAP 'Site Contamination Summary'.</p>	<p>The Auditor considers the extent of known remediation required is adequately addressed in the RAP.</p> <p>The additional characterisation of fill proposed in two areas of the site where the potential for ACM in fill was previously identified, and inspection of the site surface following removal of concrete, is required to determine that no additional remediation of impacted soils is required.</p>
<p><i>Selected Preferred Remedial Option and Rationale</i></p> <p>Remedial options were not assessed in the RAP and the rationale for selection of the preferred remediation option was not provided. Based on the current known extent of remediation (hand picking of ACM and decommissioning of the UST), off-site disposal of impacted soils is proposed.</p> <p>It is noted in the RAP that, depending on the extent of impacted soil requiring remediation or management following the surface inspection process, containment of soils on-site and management of soils under an EMP may be required. This is identified as a contingency to be addressed if encountered and is not included as a detailed remediation option.</p> <p>Groundwater remediation was not considered necessary and is not discussed in the RAP.</p>	<p>While a range of remediation options were not considered, based on the main contaminant of concern being ACM at the site surface, hand picking and off-site disposal of ACM fragments is considered appropriate.</p> <p>The Auditor notes that if the requirement for remediation of ACM impacted soils is identified through the additional fill characterisation or the surface inspection, the remedial option for ACM impacted fill may require reassessment. This is likely to include a hold point in the development while the appropriate remediation strategy is confirmed and agreed with relevant stakeholders.</p> <p>Remedial options for remediation of chlorinated hydrocarbons in groundwater were not considered in the RAP. Based on the localised nature of the contamination, the low risk to future site users and the source of the contamination likely to be off-site, remediation of groundwater is not considered</p>

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Remedial Action Plan	Auditor Comments
	necessary and management of any potential risk through a management plan is acceptable.
<p><i>Description of Remediation to be Undertaken</i></p> <p>Surface ACM: Hand picking of bonded asbestos from the site surface across the area in accordance with WA DOH Guidelines. Methodology outlined in RAP.</p> <p>Stockpiled building material and rubbish in the pit in the southeast corner of the site is to be placed in a skip bin lined with plastic sheeting and disposed off-site to landfill as Special Waste (Asbestos).</p> <p>Potential ACM in fill: Test pits are to be completed across the impacted area at a density two times that defined in WA DOH (2009). Remediation of identified impacted fill through excavation and handpicking in accordance with methodology outlined in RAP.</p> <p>UST decommissioning: removal by accredited tank removal contractor. Stockpiled soils to be classified for off-site disposal or validated for reuse.</p> <p>Surface inspection: An inspection of the site surface following removal of concrete by an appropriately qualified and experienced Environmental Consultant by undertaking line walk across the area of removed concrete on two metre spacing. Any suspect soil or fill to be further inspected using an excavator.</p>	The methodologies for remediation described in the RAP are acceptable.
<p><i>Proposed Validation Criteria</i></p> <p>The soil validation criteria proposed in the RAP are:</p> <p>NEPM health-based screening levels (HSLs) and health-based investigation levels (HILs) for commercial/industrial site use. HSLs assume a sand soil type.</p> <p>NEPM Management Limits are also included for assessment of petroleum hydrocarbons.</p> <p>For assessment of asbestos, NEPM HSL D criteria are to be adopted for ACM (0.05% w/w) and AF/FA (0.001% w/w) and no visible asbestos in the top 0.1 m.</p> <p>Ecological criteria were not considered relevant as the site surface will be fully sealed following development and the site is located within an area of industrial land use.</p>	The adopted RAC are acceptable.
<p><i>Proposed Validation Testing</i></p> <p>Surface ACM: Visual validation by a Licensed Asbestos Assessor and provision of a Clearance Certificate.</p> <p>Asbestos in fill excavation validation: Collection of soil samples from base of excavation on a 5 m grid and bulk screening of 10 L samples for ACM (>7 mm) and laboratory analysis for AF/FA for comparison with RAC. Visual inspection and provision of a Clearance Certificate.</p> <p>Asbestos in fill remediation validation: Stockpiles to be sampled at a rate of 1 per 25 m³, with a minimum of three samples per stockpile. Visual assessment and measurement of the %w/w ACM of each 10 L</p>	<p>The proposed validation sampling is acceptable.</p> <p>The Auditor notes that no groundwater validation sampling is proposed. Based on previous site investigation data this is considered acceptable, however, should gross soil contamination be encountered during the removal of the UST, consideration should be given to installation of a groundwater monitoring well to confirm contamination of groundwater has not occurred.</p> <p>The Auditor notes that imported material must either be VENM or ENM. Any materials classified under a Resource Recovery Order or Exemption, or other materials that are not classified as VENM or ENM should be sampled with the density of testing</p>

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Remedial Action Plan	Auditor Comments
<p>soil sample in accordance with the WA DOH (2009) gravimetric method and 500 ml samples for AF/FA.</p> <p>UST excavation: Collection of soil samples from the base of excavation at rate of one per tank and from the walls of the excavation at a rate of one per five linear metres. Stockpiled soil to be sampled at a rate of 1 per 25 m³, with a minimum of three samples per stockpile. Analysis of soil samples for TRH, VOCs, PAHs, OCPs and heavy metals.</p> <p>Surface inspection: Visual inspection by line walk across the area of removed concrete on two metre spacing. Any suspect soil or fill should be further inspected using an excavator.</p> <p>Imported Material: To be classified as ENM or VENM.</p>	<p>commensurate with the documentation provided and the consistency of the results.</p>
<p><i>Contingency Plan if Selected Remedial Strategy Fails</i></p> <p>The RAP includes an unexpected finds protocol and procedure for assessing and managing additional areas of asbestos impacted soil if identified. Potential management options, including treatment by hand picking, off-site disposal, management insitu and encapsulation are listed as potential contingency actions, however, details of the strategies are not provided.</p> <p>The RAP notes that other types of unexpected find should be assessed by an experienced environmental consultant and managed in accordance with the NEPM.</p>	<p>The proposed remediation strategy of off-site disposal of ACM and unexpected finds has a low risk of failure as validation failure would lead to further excavation.</p> <p>However, it is noted that should the remediation strategy change, a revision to the RAP will be required and will need to be reviewed by the Site Auditor.</p>
<p><i>Site Management Plan (operation phase) including stormwater, soil, noise, dust, odour and OH&S</i></p> <p>The RAP requires the remediation contractor to prepare a site-specific Health and Safety Plan (SSHSP) prior to works commencing, including an Asbestos Removal Control Plan.</p> <p>A Site Management Plan (SMP) is also required to be prepared documenting the environmental monitoring and management measures to be implemented during remediation and construction. Procedures are to be prepared for management of water and soil, air quality, noise and traffic management.</p> <p>The RAP identifies a list of minimum requirements to be addressed in the SSHSP and SMP and includes a summary of responsibilities and duties to be undertaken by the remediation contractor in relation to work health and safety.</p>	<p>The identified minimum requirements for the SSHSP and SMP are appropriate.</p>
<p><i>Remediation Schedule and Hours of Operation</i></p> <p>Civil remediation work to be restricted to 7 am to 6pm Monday to Saturday.</p> <p>The anticipated duration of the works and start date is not provided.</p>	<p>Acceptable. The remediation contractor should include a proposed schedule of works in the SMP.</p>
<p><i>Interim Site Management Plan (before remediation)</i></p> <p>Not discussed in RAP</p>	<p>The majority of the site area is currently sealed or covered with buildings which limit the potential for contaminants to present a risk to current site users and neighbouring site users.</p>
<p><i>Contingency Plans to Respond to Site Incidents</i></p>	<p>Acceptable.</p>

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Remedial Action Plan	Auditor Comments
Contingency plan for site incidents is included in the RAP, including unexpected finds, excessive dust, odours, noise, flooding and equipment failure	
<p><i>Licence and Approvals</i></p> <p>The RAP includes details of required regulatory approvals and licences.</p> <p>Materials to be disposed offsite shall be classified in accordance with EPA (2014) <i>Waste Classification Guidelines</i> and transported in accordance with requirements of the POEO Act 1997.</p> <p>Regulation requirements for the movement and disposal of asbestos are included and the RAP, which states that asbestos removal is to be completed under the supervision of a Class B Licenced Asbestos Removalist. A site-specific asbestos removal permit is to be obtained at least seven days before the work is to commence.</p> <p>An Asbestos Removal Control Plan is to be prepared by the party undertaking asbestos removal activities prior to the commencement of works.</p> <p>Imported materials will only be accepted to the site if they meet the definition of:</p> <ul style="list-style-type: none"> • Virgin Excavated Natural Material (VENM) as defined in the Protection of the Environment Operations Act (1997) Schedule 1; • Excavated Natural Material (ENM) as defined in EPA (2014). 	The relevant licenses and approvals have been appropriately identified in the RAP.
<p><i>Contacts/Community Relations</i></p> <p>The RAP states that as the immediate surrounding land use is non-sensitive (industrial precinct), community consultation on site remediation is not considered necessary. The RAP does indicate that signage will be installed at site entrances detailing the location of first aid facilities and after hour contacts and that warning signs will be placed around the perimeter of the site to prevent unauthorised access.</p>	Acceptable.
<p><i>Long Term Environmental Management Plan</i></p> <p>A Long Term Environmental Management Plan (LTEMP) has been proposed which will identify management measures to be implemented to mitigate potential vapour intrusion risks to subsurface construction or maintenance workers undertaking intrusive works in the south-eastern portion of the site. The minimum requirements for the EMP are identified in the RAP. The RAP also indicates the parties responsible for implementing the RAP (Fabcot as the site owner). The RAP also notes the required mechanism for notification of the EMP (notification on the 10.7 Planning Certificate and covenant on title) and the requirement for the EMP to be made a condition of development consent by Council.</p> <p>It is noted in the RAP that the EMP may be required to manage any additional contamination identified during the remediation and development but does</p>	<p>The LTEMP will be required to manage risks to intrusive site workers associated with potential vapour inhalation.</p> <p>Should additional contamination be identified during remediation that requires management with an EMP, the proposed remediation strategy and ongoing management requirements will need to be detailed in a revised RAP and approved by the Site Auditor.</p> <p>Confirmation that Council agree with the implementation of an EMP will also be required.</p> <p>Future development consents should include a condition requiring the conditions of any SAS to be conditions of the development to assist with the enforceability of the LTEMP.</p>

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Remedial Action Plan	Auditor Comments
not indicate what this contamination may comprise or what management measures may be required.	

Auditor's Opinion

In the Auditors' opinion, the proposed remediation approach in the RAP is adequate for remediation of surface ACM, the identified UST and further characterisation of ACM in fill. Management of potential risk to intrusive workers from inhalation of chlorinated hydrocarbons in soil vapour through implementation of a LTEMP is also considered an acceptable approach. If adequately implemented, the RAP should ensure that the site is suitable for the proposed commercial land use, subject to successful implementation of the strategy and preparation of a validation report and an appropriate LTEMP. Auditor review of any addition to or alteration of remediation requirements is required should the remediation strategy change following further characterisation of fill material or to manage unexpected finds.

6. CONCLUSIONS AND RECOMMENDATIONS

The RAP proposes additional characterisation of fill for asbestos and remediation of surface ACM and a UST through off-site disposal. A surface inspection protocol is included to inspect for ACM impacted fill and other potential sources of contamination following removal of buildings and concrete slabs. The RAP proposes remediation of any impacted fill by off-site disposal. It is proposed to manage potential risk to intrusive workers from inhalation of chlorinated hydrocarbons in soil vapour through implementation of a LTEMP. The LTEMP will stipulate health and safety requirements to be implemented to manage any potential risk.

Based on consideration of historical data reviewed in the two previous IAA prepared for the site and the CSM, competent implementation of the RAP should ensure that the site is suitable for its proposed commercial site use. The following is noted in making this consideration:

- The RAP does not identify an alternate remediation approach should significant volumes of asbestos impacted fill be encountered following removal of site buildings and concrete cover. Should the remediation strategy change as a result of additional fill characterisation or the surface inspection process, the proposed remediation works should be reviewed by the Auditor. A Remedial Works Plan or an amended RAP may be required to document the changes.
- Further assessment of groundwater in the vicinity of the UST may be required if significant soil contamination is identified.
- After successful implementation of the RAP and any addendums, a Site Audit Statement and accompany Site Audit Report will be prepared assessing the suitability of the site for the proposed use, as well as the long-term management requirements.
- With respect to the proposed LTEMP, it is recommended that future development consents include a condition requiring the conditions of any Site Audit Statement to be conditions of the development to assist with the enforceability of the LTEMP.

* * *

Consistent with the NSW EPA requirement for staged 'signoff' of sites that are the subject of progressive assessment, remediation and validation, I advise that:

- This advice letter does not constitute a Site Audit Report or Site Audit Statement.
- At the completion of the remediation and validation I will provide a Site Audit Statement and supporting documentation.

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- This interim advice will be documented in the Site Audit Report.

Yours faithfully

Ramboll Australia Pty Ltd



Louise Walkden

EPA Accredited Site Auditor 1903

Attachments: 1 Site Boundaries
 2 Proposed Development Plan
 3 Extent of Proposed Remediation



Legend

- Site boundary
- Lot boundaries

AREA SCHEDULE

PARKING

RECEIVING DOCKS 1300mm	5
DELIVERY TRUCK DOCKS 900mm	28
B2B STAGING TRUCKS (incl. 1 Figure Dock & 2 Van Loading Dock)	3

Builder and/or subcontractors shall verify all project dimensions before commencing on-site work or off-site fabrication. Figured dimensions shall take precedence over scaled dimensions. This drawing is copyright and cannot be reproduced in whole or in part or by any medium without the written permission of Nettleton Tribe Partnership Pty Ltd.

Key Plan

[illegible]

Client Logo

Build:

Builders Logo

Project Name
CFC Percy St. Auburn

Project Address
**13 Percy Street,
Auburn, NSW 2144**

Drawing Title
SITE PLAN - OPTION 7

Author: ES	Checker: Checker	Sheet Size: A1	Scale: 1 : 500
Drawing Number: 11250 SK038			Issue: P1

nettleontribe

Nettleton tribe partnership Pty Ltd ABN 58 161 683 122
Level 5, 344 Queen Street, Brisbane, QLD 4000
+61 7 3239 2444
e: brisbane@nettletontribe.com.au w: nettletontribe.com.au

