



**REPORT TO
HEALTH INFRASTRUCTURE**

**ON
REMEDIAL ACTION PLAN (RAP)**

**FOR
PROPOSED NEW MULTI-STOREY CAR PARK**

**AT
LIVERPOOL HOSPITAL, MAIN CAMPUS, ELIZABETH
STREET, LIVERPOOL, NSW**

Date: 30 April 2020
Ref: E32465BDrpt6-RAP

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Executive Summary

Johnstaff Projects Pty Ltd on behalf of Health Infrastructure NSW ('the client') commissioned JK Environments (JKE) to prepare a Remediation Action Plan (RAP) for the proposed new multi-storey car park (MSCP) at Liverpool Health + Academic Precinct (Liverpool Hospital), Elizabeth Street, Liverpool, NSW ('the site'). The site location is shown on Figure 1 and the RAP applies to the land within the site boundaries as shown on Figure 2 attached in Appendix A.

This report has been prepared for the proposed MSCP development and supports the lodgement of the associated State Significant Development Application (SSDA).

JKE have previously undertaken a Stage 2 Environmental Site Assessment (ESA) at the site. JKE note that the Contaminants of Potential Concern (CoPC) identified in the Stage 2 ESA did not present a risk to human health. However, data gaps were identified with the Areas of Environmental Concern (AEC) which required further assessment to inform the remediation strategy for the site. Information from the JKE Stage 2 ESA is presented throughout this report (where relevant) and a detailed summary of the findings is included in Section 2.

Post-demolition validation sampling is required to assess the potential for asbestos in soil data gap in the west section of the site, to further assess the extent of remediation. Other CoPC are to be considered for completeness and for waste classification purposes, given that all boreholes drilled within the existing P2 MSCP footprint area meet refusal within fill. The Post-demolition validation scope of works is outlined in Section 4.

The goal of the remediation is to render the site suitable for the proposed development from a contamination viewpoint. The primary aim of the remediation at the site is to reduce the human health risks posed by the site contamination to an acceptable level. The remediation objectives are to:

- Provide a methodology to undertake inspections, further sampling and assessment of the extent of contamination after demolition;
- Provide a methodology to remediate and validate the site;
- Provide a contingency plan for the remediation works;
- Outline site management procedures to be implemented during remediation work; and
- Provide an unexpected finds protocol to be implemented during the development works.

The preferred option for remediation of the contaminated fill at the site is excavation and off-site disposal of the contaminated material. The contaminated fill should be excavated/removed prior to the commencement of bulk earthworks in order to limit the potential for cross-contamination and blending of waste streams.

JKE are of the opinion that the site can be made suitable for the proposed development provided this RAP is implemented accordingly. A site validation report should be prepared on completion of remediation activities and should be submitted to the consent authority.

The conclusions and recommendations should be read in conjunction with the limitations presented in the body of this report.

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Abbreviations

Asbestos Containing Material	ACM
Asbestos Fines/Fibrous Asbestos	AF/FA
Australian Height Datum	AHD
Below Ground Level	BGL
Benzo(a)pyrene Toxicity Equivalent Factor	BaP TEQ
Benzene, Toluene, Ethylbenzene, Xylene	BTEX
Contaminated Land Management	CLM
Contaminant(s) of Potential Concern	CoPC
Chain of Custody	COC
Conceptual Site Model	CSM
Development Application	DA
Data Quality Indicator	DQI
Data Quality Objective	DQO
Detailed Site Investigation	DSI
Ecological Investigation Level	EIL
Environmental Investigation Services	EIS
Ecological Screening Level	ESL
Environmental Management Plan	EMP
Environment Protection Authority	EPA
Environmental Site Assessment	ESA
Ecological Screening Level	ESL
General Approval of Immobilisation	GAI
Health Investigation Level	HILs
Health Screening Level	HSL
JK Environments	JKE
Map Grid of Australia	MGA
National Association of Testing Authorities	NATA
National Environmental Protection Measure	NEPM
Organochlorine Pesticides	OCP
Organophosphate Pesticides	OPP
Polycyclic Aromatic Hydrocarbons	PAH
Polychlorinated Biphenyls	PCBs
Photo-ionisation Detector	PID
Protection of the Environment Operations	POEO
Practical Quantitation Limit	PQL
Quality Assurance	QA
Quality Control	QC
Remediation Action Plan	RAP
Site Assessment Criteria	SAC
Sampling, Analysis and Quality Plan	SAQP
Source, Pathway, Receptor	SPR
State Significant Development Application	SSDA
Toxicity Characteristic Leaching Procedure	TCLP
Total Recoverable Hydrocarbons	TRH
Trip Spike	TS
Upper Confidence Limit	UCL
United States Environmental Protection Agency	USEPA
Validation Assessment Criteria	VAC
Virgin Excavated Natural Material	VENM
Volatile Organic Compounds	VOC
Work Health and Safety	WHS



Units

Litres	L
Metres BGL	mBGL
Metres	m
Millilitres	ml or mL
Micrograms per Litre	µg/L
Milligrams per Kilogram	mg/kg
Milligrams per Litre	mg/L
Parts Per Million	ppm
Percentage	%

1 INTRODUCTION

Johnstaff Projects Pty Ltd on behalf of Health Infrastructure NSW ('the client') commissioned JK Environments (JKE) to prepare a Remediation Action Plan (RAP) for the proposed new multi-storey car park (MSCP) at Liverpool Health + Academic Precinct (Liverpool Hospital), Elizabeth Street, Liverpool, NSW ('the site'). The site location is shown on Figure 1 and the RAP applies to the land within the site boundaries as shown on Figure 2 attached in Appendix A.

This report has been prepared for the proposed MSCP development and supports the lodgement of the associated State Significant Development Application (SSDA).

JKE have previously undertaken a Stage 2 Environmental Site Assessment (ESA) at the site (JKE Ref: E32465BDrpt5, dated 29 January 2020)¹. JKE note that the Contaminants of Potential Concern (CoPC) identified in the Stage 2 ESA did not present a risk to human health. However, data gaps were identified with the Areas of Environmental Concern (AEC) which required further assessment to inform the remediation strategy for the site. Information from the JKE Stage 2 ESA is presented throughout this report (where relevant) and a summary of the findings is included in Section 2.

This RAP has been prepared to address the Stage 2 ESA data gaps by the proposed post-demolition validation assessment outlined in Section 4. The RAP includes a methodology to remediate and validate the site in the event that the actual contamination is identified by the post-demolition validation assessment. A contingency plan for remediation is included together with site management procedures and an unexpected finds protocol to be implemented during remediation.

JKE note based on review of the latest NearMap² aerial imagery, the Ron Dunbier Building which forms part of the site appears to have been recently demolished. Any unexpected finds in this area associated with future works should be addressed as outlined in this RAP.

1.1 Proposed Development Details

Based on the supplied information, JKE understand the proposed MSCP development will include demolition of the existing P2 MSCP, associated on-grade car park to the east, and internal roads and landscaped areas in the north-eastern corner of the western campus. A new MSCP (seven levels) is to be constructed in the east section of the site, which will be oriented east-west. Extending off the eastern end of the southern side of the new MSCP will be a circular vehicle ramp structure. We understand that two additional floors may be provided to the structure at a later stage. The proposed car park structure will be supported on piles socketed into the underlying bedrock. An on-grade park associated with the new MSCP is proposed in the west section of the site.

¹ JKE, (2020). Report to Health Infrastructure on Stage 2 Environmental Site Assessment (ESA) for Proposed New Multi-storey Car Park at Liverpool Health + Academic Precinct, Elizabeth Street, Liverpool, NSW (referred to as the 'JKE Stage 2 ESA')

² <http://maps.au.nearmap.com/>, viewed 28 April 2020

The ground floor level will be constructed at approximately RL10.5m and will require filling above existing grade to a maximum height of approximately 1m to achieve design subgrade level. Lifts are proposed towards the western end of the southern side of the new MSCP. We have assumed that the lift pit will require excavation to a maximum depth of approximately 2m below design subgrade level. New asphaltic concrete paved roadways and landscaping (including trees, shrubs, grass and synthetic grass) are proposed around the new MSCP. We have not been informed if surplus material will be generated as part of the proposed development.

JKE understand that civil infrastructure works (including the demolition of the existing Ron Dunbier building, located in the east section of the site) are to occur prior to construction of the new MSCP. The civil infrastructure works are captured under a separate planning pathway. Based on review of the latest NearMap aerial imagery, the Ron Dunbier Building appears to have been recently demolished.

Copies of relevant proposed development drawings supplied by the Johnstaff Projects Pty Ltd are attached in Appendix B.

1.2 Remediation Goal, Aims and Objectives

The goal of the remediation is to render the site suitable for the proposed development from a contamination viewpoint. The primary aim of the remediation at the site is to identify and reduce the human health risks posed by potential site contamination to an acceptable level.

The remediation objectives are to:

- Provide a methodology to undertake inspections, further sampling and assessment of the extent of potential contamination after demolition;
- Provide a methodology to remediate and validate the site in the event that contamination that pose a risk to site receptors are identified requiring remediation;
- Provide a contingency plan for the remediation works;
- Outline site management procedures to be implemented during remediation work; and
- Provide an unexpected finds protocol to be implemented during the development works.

1.3 Scope of Work

The RAP was prepared generally in accordance with a JKE proposal (Ref: EP51648BD) of 20 April 2020 and written acceptance from the client of 28 April 2020. The scope of work included consultation with the client, regarding the remedial options and sequence of works, and preparation of a RAP.

The scope of work was undertaken with reference to the National Environmental Protection (Assessment of Site Contamination) Measure 1999 as amended (2013)³, other guidelines made under or with regards to the

³ National Environment Protection Council (NEPC), (2013). *National Environmental Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013)*. (referred to as NEPM 2013)

Contaminated Land Management Act (1997)⁴ and SEPP55. A list of reference documents/guidelines is included in the appendices.

⁴Contaminated Land Management Act 1997(NSW)(referred to as CLM Act 1997)

2 SITE INFORMATION

2.1 Background and Summary of Site History

JKE have recently prepared a number of reports for the future development of Liverpool Hospital. The JKE Stage 2 ESA for the site included a site inspection and a desktop review of historical information. The site has been occupied by the hospital since the late 1800's.

The potential contamination sources and CoPC identified by the JKE Stage 2 ESA prior to assessment of the soil and groundwater data are presented in the following table:

Table 2-1: Potential (and/or known) Contamination Sources and Contaminants of Potential Concern

Source / AEC	CoPC
<p><u>Fill material:</u> The site appeared to have been historically filled to achieve the existing levels.</p> <p>Review of aerial photographs indicated that stockpiled soils were located to the east of the former maintenance building between 1961 and 1970. Additionally, a dam/water feature was located to the west of Ron Dunbier Building in 1982 and appeared to have been subsequently filled by 2009. This area is located within the east section of the MSCP site.</p> <p>Remediation works were undertaken immediately to the west of the south-east section of the site and partially within the south-east section of the site in 2008 for the New Clinical Services Building development. Remediation was required due to elevated concentrations of lead and PAHs (including benzo(a)pyrene) and Asbestos Containing Materials (ACM) as Fibre Cement Fragments (FCF) within fill material.</p> <p>The fill may have been imported from various sources and could be contaminated. Verification of imported material during previous remediation was not undertaken.</p>	<p>Heavy metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc), petroleum hydrocarbons (referred to as total recoverable hydrocarbons – TRHs), benzene, toluene, ethylbenzene and xylene (BTEX), polycyclic aromatic hydrocarbons (PAHs), organochlorine pesticides (OCPs), organophosphate pesticides (OPPs), polychlorinated biphenyls (PCBs) and asbestos.</p>
<p><u>Historical agricultural use:</u> The site appeared to have been used for grazing and market garden purposes and a piggery. This could have resulted in contamination across the site via use of machinery, application of pesticides and building/demolition of various structures. Irrigation pipes made from asbestos cement may also be associated with this AEC.</p> <p>Additionally, pesticides may have been used beneath the buildings and/or around the site</p>	<p>Heavy metals, TRH, PAHs, OCPs, PCBs and asbestos</p>

Source / AEC	CoPC
<p><u>Hazardous Building Material:</u> Both friable and non-friable asbestos construction materials have been identified within the Ron Dunbier Building by the JKE Hazardous Building Material Assessment (JKE Ref: E32160Brpt-Hazrev, dated 2 July 2019)⁵. The Ron Dunbier Building appears to have been recently demolished.</p> <p>Hazardous building materials may be present at the surface or within the fill material as a result of former/current building and demolition activities at Liverpool Hospital.</p> <p>JKE have also undertaken a Hazardous Building Material Assessment for the existing P2 MSCP which is to be demolished (JKE Ref: E32465BD2rpt HAZ, dated 5 September 2019)⁶. Hazardous building materials were not identified.</p>	<p>Asbestos, lead and PCBs</p>
<p><u>Onsite and Off-site – Fuel storage and mechanical workshops:</u> SafeWork NSW records and the site inspection indicated that stored hazardous chemicals including Ethyl Alcohol Solution, Acetone and Xylene were identified to the west of the site as shown in Figure 2 attached in Appendix C.</p> <p>SafeWork NSW records for dangerous good (e.g. petroleum storage) indicated that a number of Underground Storage Tanks (USTs) and Above Ground Storage Tanks (ASTs) were formerly located within the western campus of Liverpool Hospital and off-site. The closest UST and AST locations to the site are shown on Figure 2 attached in Appendix C. UST 3 was likely removed during the basement excavation of the hospitals clinical services building. The potential UST 3 and existing ASTs 5 locations are down gradient from the site and were not considered to be a potential source of off-site migration to the site.</p> <p>A former service station and mechanical workshops have been identified to the south-west, within 175m and potentially up-gradient of the site.</p> <p>Spillage or discharge of stored chemicals from up-gradient sites could have occurred and have the potential to migrate onto the site via groundwater or underground service pipework/trenches which run through the site.</p>	<p>Heavy metals (lead), TRH and BTEX</p>

⁵ JKE, (2019b). Report to Johnstaff on Hazardous Building Materials Assessment for Proposed Demolition Works, Rod Dunbier Building, Liverpool Hospital, Liverpool, NSW (referred to as the 'JKE Ron Dunbier HAZMAT')

⁶ JKE, (2019c). Report to Johnstaff Projects Pty Ltd on Hazardous Building Material Survey for Proposed Demolition Works, Liverpool Hospital, P2 Car Park, Goulburn Street, Liverpool, NSW (referred to as the 'JKE P2 MSCP HAZMAT')

Source / AEC	CoPC
<p>Offsite - Dry Cleaners and Printers: Former dry cleaning and printing/letterpress businesses were identified between approximately 100m and 411m to the west and potentially up gradient of the site.</p> <p>Spillage or discharge of stored chemicals from up-gradient sites could have occurred and has the potential to migrate onto the site via groundwater or underground services pipework/trenches which run through the site.</p>	<p>TRHs and VOCs, including tetrachloroethene (also known as perchloroethylene - PCE) and the breakdown products trichloroethene (TCE), cis-1,2-dichloroethene (cis-DCE) and vinyl chloride (VC).</p>

The JKE ESA incorporated data obtained during a separate JKE Stage 2 ESA (JKE Ref: E32465BDrpt4, dated 10 October 2019)⁷, which included sampling from a total of 40 boreholes and four groundwater monitoring wells. Twenty three sampling locations (JKE111 to JKE132, inclusive) of the 40 sampling locations and one groundwater monitoring well (MW122) were positioned generally within the MSCP site area. The applicable sampling locations for the site are shown on Figure 2 attached in Appendix C.

JKE note that sampling locations JKE129, JKE131 and JKE133 are technically located outside of the proposed MSCP development area. However, these sampling locations are located beneath the existing P2 MSCP and therefore were considered sufficient for inclusion of the assessment of potential contamination for the proposed MSCP development. The total number of locations for the MSCP site does not meet the minimum sampling density for hotspot identification, as outlined in the EPA Contaminated Sites Sampling Design Guidelines 1995 based on the MSCP site area of approximately 15,000m². An additional two sampling locations are required to meet the EPA Contaminated Sites Sampling Design Guidelines 1995 recommended sampling density.

Elevated soil concentrations of TRH (F3) were identified in the fill above the ecological-based Site Assessment Criteria (SAC). The source of TRH is likely associated with the importation of fill to the area. The copper and zinc results of all groundwater samples obtained were greater than the ecological-based SAC. Elevations of heavy metals (particularly copper and zinc) are very common in urban groundwater as a result of leaking water infrastructure and surface run-off. The ecological elevations are shown on Figure 4 attached in Appendix C. Based on the Tier 1 risk assessment, the levels of contamination identified in the soils and groundwater at the site above the ecological-based SAC were assessed to pose a low risk to the receptors and remediation was not proposed due to the ecological elevations.

All of the soil laboratory results for the site were below the human-health based SAC. However, refusal was encountered within the fill in all boreholes drilled in the west section of the site (JKE138 to JK133, inclusive), located on the ground floor and within the existing P2 car park as a result of these locations having to be sampled using hand tools.

⁷ JKE, (2019). Report to Health Infrastructure on Stage 2 Environmental Site Assessment (ESA) for Proposed Liverpool Hospital – Civil Infrastructure Works, Elizabeth Street, Liverpool, NSW (referred to as the 'JKE Stage 2 ESA (2019)')

The JKE Stage 2 ESA (2019) identified elevated concentrations of above the human-health based site SAC, notably the following:

- The calculated Asbestos Fines (AF)/ Fibrous Asbestos (FA) concentrations of 0.0373% w/w (JKE136 (0-0.2m)) and 0.0085% w/w (JKE137 (0.04-0.2m)) were above the SAC of 0.001% w/w. The sampling locations and contamination data are shown in Figure 3 attached in Appendix C and are located immediately to the south-west of the site. AF/FA or ACM were not observed during soil sampling and bulk screening field works. AF/FA materials are considered friable; and
- A surface ACM (sample ref: AMF1) were identified immediately to the south west of the site and in the eastern hospital campus (sample ref: AMF101). The ACM sampling locations are shown in Figure 3 attached in Appendix C. The ACM were unable to be broken by hand and therefore considered non-friable by our field staff.

Exposed surface soils were evident at sampling location JKE136. To further assess the risk of asbestos dust exposure to receptors, Interim asbestos controls recommended by JKE were implemented by the South Western Sydney Local Health District (SWSLHD), including asbestos air fibre monitoring and temporary capping/barricading of the exposed surface soils within the area surrounding sampling location JKE136. JKE have subsequently prepared an Interim Asbestos Management Plan (IAMP) in December 2019⁸ for the entire Liverpool Hospital grounds for the SWSLHD. The IAMP included the recommendations for an 'emu pick' of potential surface ACM across the entire hospital grounds, a visual asbestos surface clearance inspection/certificate and at the SWSLHD request a semi-permanent capping procedure for the area surrounding JKE136. JKE have since visually observed the surface where the semi-permanent capping appeared to have been implemented in the landscaped areas around sampling location JKE136, however no further information has been provided.

The JKE Stage 2 ESA identified the following data gaps in the table below:

Table 2-2: Data Gaps from the JKE ESA

Data Gap	Assessment
Underground services and on-site migration of contamination.	<p>Although the risk to the proposed development is considered low, there remains a potential for migration of contamination from off-site fuel storage, mechanical workshops, dry cleaners and printers via underground services and trenches.</p> <p>JKE are of the opinion that the risk can be addressed by the preparation and implementation of an unexpected finds procedure by the head construction contractor.</p>
Extent of AF/FA in fill (JKE136 and JKE137).	<p>At this stage, the extent of the AF/FA impacted fill soil in the north-west section of the site appears likely to be confined to the immediate area surrounding sampling locations JKE136 and JKE137. However, the extent of AF/FA impacted fill soil requires further assessment, including in the west section of the proposed MSCP development area (beneath the existing P2 MSCP), due to the refusal encountered in the fill material in this area. The additional asbestos assessment should be undertaken following demolition of the existing P2 MSCP (to allow access to suitable machinery for sampling</p>

⁸ Report to South Western Sydney Local Health District, on Interim Asbestos Management Plan (IAMP), Interim Due Diligence and Management, at Liverpool Hospital, Elizabeth Street, Liverpool, NSW (JKE ref: E32865PLrpt IAMP, dated 13 December 2019) (referred to as JKE IAMP)

Data Gap	Assessment
	purposes) and the assessment undertaken in accordance with the WA DoH 2009 Guidelines (endorsed in NEPM 2013).

The JKE Stage 2 ESA concluded that the site could be made suitable for the proposed development provided that the following was implemented:

1. Following demolition of the existing P2 MSCP, an additional asbestos assessment was undertaken beneath the P2 MSCP building footprint to address the data gap identified;
2. A RAP was prepared, if required and based on the results of the additional asbestos assessment;
3. An Acid Sulfate Soil Management Plan (ASSMP) was prepared, should the proposed MSCP development include works (e.g. piling) which have the potential to disturb potential Acid Sulfate Soils (ASS) beneath groundwater and/or the ASS detected in the extremely weathered siltstone sample JKE116 (15.4-15.6m);
4. A Salinity Management Plan (SMP) was prepared; and
5. A Construction Environmental Management Plan (CEMP) was prepared by the appointed contractor. The CEMP should include an unexpected finds procedure for contamination.

2.2 Site Identification and Site Information

Table 2-3: Site Identification

Current Site Owner:	Health Infrastructure NSW
Site Address:	Part of 50 Goulburn Street, Liverpool, NSW (Liverpool Hospital). Address also known as Elizabeth Street, Liverpool, NSW.
Lot & Deposited Plan:	Part of Lot 501 DP 1165217
Current Land Use:	Hospital
Proposed Land Use:	Hospital
Local Government Authority:	Liverpool City Council
Current Zoning:	SP2 Infrastructure (Health Services Facility and Education) – Liverpool LEP 2008 (Liverpool Hospital)
Site Area (m²):	Approximately 15,000m ²
RL (AHD in m) (approx.):	10-14
Geographical Location (decimal degrees) (approx.):	Latitude: -33.919244 Longitude: 150.932669
Site Location & Regional Setting:	The site is located in a predominantly residential and commercial area of Liverpool and within the west section of Liverpool hospitals western campus. The Liverpool hospital western campus is bounded by Campbell Street and Liverpool Girls High School to the north, Goulburn Street to the west, The Main Southern Railway to the east and Elizabeth to the south. The site is located in the north east section of the

	western campus. and Liverpool Hospital western campus to the west. Georges River is located approximately 200m to the south-east of the site.
Topography:	The regional topography is characterised by gentle slopes which generally fall to the east and north east at approximately 1-2°. The site itself is generally flat and appears to have been filled to accommodate the existing hospital buildings and features.
Geology & Hydrogeology:	<p>Regional geological information presented in the JKE Stage 2 ESA indicated that the site is primarily underlain by Bringelly Shale of the Wianamatta Group, which typically consists of shale, carbonaceous claystone, claystone, laminite, fine to medium grained lithic sandstone, rare coal and tuff. The eastern and north-eastern section of the site are underlain by clayey quartzose sand and clay.</p> <p>The JKE Stage ESA encountered fill to ranging depths from 0.4m Below Ground Level (BGL) to 4.4mBGL. The fill typically comprised of gravelly sand, sandy gravel, silty sand, clayey sand, silty clayey sand and silty clay with inclusions of ironstone, igneous, sandstone, siltstone and river gravel, root fibres, ash, slag and building rubble (asphalt, bricks, concrete and tile fragments). A number of the sampling locations drilled with hand tools (due to access limitations) were terminated in the fill due to refusal (fill depths are shown on Figure 2 in Appendix C). The fill was underlain by natural clay and siltstone bedrock at some locations.</p> <p>The information reviewed for this assessment indicated that the subsurface conditions at the site are likely to consist of residual and alluvial soils overlying relatively deep bedrock. The potential for viable groundwater abstraction and use of groundwater under these conditions is considered to be low. The groundwater may also be saline. JKE note that there is a reticulated water supply in the area and use of groundwater as a drinking water resource is highly unlikely. Use of groundwater is not proposed as part of the development. There are no proposed basements.</p> <p>Standing Water Levels (SWLs) measured in the monitoring wells installed for the JKE Stage 2 ESA (2019) ranged from 7.85mBGL to 8.2mBGL. Groundwater RLs calculated on these measurements ranged from RL2.81m to RL7.9m. Groundwater RLs calculated on these measurements ranged from RL 1.70m (MWJKE122) to RL 2.99m (JKEMW135).</p> <p>A groundwater contour plot was prepared for the groundwater levels using Surfer v11.0.642 (Surface Mapping Program) for the JKE Stage 2 ESA (2019) indicated that groundwater was likely to flow from the west to the north-east in this area of the hospital. The groundwater contour plot is shown on Figure 5 attached in Appendix C.</p>
Surrounding Land Use:	<p>During the site inspection for the Stage 2 ESA (2019), JKE observed the following land uses in the immediate surrounds:</p> <ul style="list-style-type: none"> • North – Liverpool Girls/Boys High School; • South – Liverpool Hospital Western Campus and TAFE NSW, beyond Elizabeth Street; • East – Liverpool Hospital eastern campus, beyond the Main Southern Railway; and • West – Liverpool Hospital Western Campus.

2.3 Site Inspection

At the time of the JKE Stage 2 ESA (2019) site inspection, the north west section of the site was occupied by P2 MSCP, to the east of the MSCP was a hardstand on grade car park, linked to the MSCP. The north east section of the site was occupied by a multistorey building (identified as Ron Dunbier building). The Ron Dunbier building appeared to be in a dilapidated state and was vacant. The remainder of the site was either occupied by hardstand surfaces including internal roadways or landscaping. The landscaped areas included medium sized trees, shrubs and grass cover. The vegetation appeared relatively healthy with no signs of stress. However, grass cover was scarce in some areas shaded by trees.

2.4 Summary of Site Contamination

As discussed in the summary of the JKE Stage 2 ESA in Section 2.1, the levels of contamination identified in the soils and groundwater at the site above the ecological-based SAC were assessed to pose a low risk to the receptors and remediation was not proposed due to the ecological elevations. Additionally, all of the soil laboratory results for the site were below the human-health based SAC. However, the potential for friable asbestos (AF/FA) in the west section of the site beneath the existing P2 MSCP footprint requires further assessment and has been identified as a data gap. Surface ACM were also identified in areas of the hospital outside of the site. The relevant off-site contamination data is shown on Figure 3 attached in Appendix C.

Post-demolition validation sampling is required to assess the potential for asbestos in soil data gap in the west section of the site, to further assess the extent of remediation. Other CoPC are to be considered for completeness and for waste classification purposes, given that all boreholes drilled within the P2 MSCP footprint area meet refusal within fill. The Post-demolition validation scope of works is outlined in Section 4.

3 REVIEW OF CONCEPTUAL SITE MODEL

The table below includes a review of the conceptual site model (CSM) and this CSM has been used to design the remediation strategy in the event that the post-demolition validation assessment identifies asbestos in soil. The CSM will require further review when additional site data becomes available.

Table 3-1: CSM Review

Potential contaminant source(s) and contaminants of concern	<p>The potential contamination source is the historically imported fill (soil) and/or demolition of former buildings containing asbestos. At this stage, the primary contaminants of concern from a remediation aspect is asbestos.</p> <p>Other CoPC identified in the JKE Stage 2 ESA are to be considered for the post-demolition validation.</p>
Potential Affected media	<p>At this stage, soil/fill has been identified as the potential affected medium for remediation.</p>
Potential Receptor identification	<p>Human receptors include construction workers who come into contact with the potentially contaminated soil and site occupants/users (including adults and children in a commercial-type land use scenario as a hospital).</p>
Potential Exposure pathways	<p>At this stage, the exposure pathway associated potential asbestos in soil to human receptors is the potential for inhalation of airborne asbestos fibres.</p>

4 POST-DEMOLITION VALIDATION

Post-demolition validation is required primarily to assess if the friable asbestos (AF/FA) identified in the fill soil at sampling locations JKE136 and JKE137 located to the south west of the site extends onto the north west section of the site and beneath the existing P2 MSCP footprint.

The post-demolition validation must occur following demolition of the existing P2 MSCP, removal of hardstand (asphaltic concrete (AC)) and prior to any excavation/off-site disposal of the fill.

The site has been identified as 'moderate risk' area in the JKE IAMP due to the detection of friable asbestos in soil in the nearby JKE former sampling locations JKE136 and JKE137. JKE assume that at the time of the post-demolition validation assessment, the site would be a construction site and under management by the principal contractor. A separate and standalone AMP must be prepared and implemented for all asbestos removal/remediation works. The post-demolition validation field works must consider and implement suitable asbestos related controls where necessary.

4.1 Objectives

The objectives of the post-demolition validation investigation are to:

- Further characterise the fill soil contamination conditions in the north west section of the site;
- Finalise the waste classification for the fill soil disposal;
- Confirm the extent of the required soil remediation if contamination is identified;
- Assess whether any of the CoPC (other than asbestos) occur at concentrations that require further remediation and/or variation to the validation plan outlined in the RAP; and
- Facilitate the preparation of a Remedial Works Plan (RWP) in the event that additional or alternative remediation/validation strategies are required.

4.2 Additional Soil Sampling Beneath the P2 MSCP

- Soil samples are to be collected from eight sampling locations (JKE201 to JKE208) targeting the western P2 MSCP footprint area. The proposed sampling locations are shown on Figure 2 in Appendix A;
- Sampling is preferably to occur by test pitting using an excavator. Samples are to be collected from each fill profile and from the top (~ 0.5m) of the natural soil/bedrock beneath the fill; and
- Asbestos quantification of bulk fill samples is required in accordance with the NEPM 2013; and
- All soil samples will be screened using a photo-ionisation detector (PID).

4.3 Decontamination and Sample Preservation

Any re-usable equipment should be decontaminated using a scrubbing brush and potable water and Decon 90 solution (phosphate free detergent) followed by rinsing with potable water.

Samples will be preserved by immediate storage in an insulated sample container with ice. Any additional sample preservation requirements for specific analytes should also be adopted as required. On completion

of the fieldwork, the samples should be delivered in the insulated sample container to a NATA registered laboratory for analysis under standard chain of custody (COC) procedures.

One sample per fill profile at each location is to be submitted for analysis of the CoPC identified for fill (see Table 2-1). Leachate testing (TCLP) will also be undertaken for waste classification purposes. Additional analysis should also be scheduled as required based on any observations of odours, staining and/or elevated PID results.

4.4 Quality Assurance/Quality Control (QA/QC)

Rinsate samples should be obtained during the decontamination process of re-usable equipment as part of the field QA/QC requirements. Inter and intra-laboratory duplicates should be collected and analysed for the soil assessment at a rate of 5% for inter-laboratory and 5% for intra-laboratory analysis. A trip spike and trip blank should also be submitted and analysed with each batch of samples.

4.5 Data Assessment

The data for the site should be assessed using the validation assessment criteria (VAC) outlined in Section 8.2.

For waste classification purposes, the soil data should be assessed against the NSW Waste Classification Guidelines, Part 1: Classifying Waste (2014)⁹.

4.6 Reporting

On completion of the investigation, an interim validation and waste classification assessment report must be completed presenting the results of the investigation and confirming the extent of the required soil remediation works.

In the event that additional soil contamination (other than asbestos) is encountered that requires remedial measures to be implemented outside the scope of this RAP, a RWP must be prepared. The client and validation consultant are to discuss whether the RWP needs to be submitted to the consent authority (this will depend on how substantial the changes are to the scope of remediation) and the client is to take steps to notify consent authority and other relevant authorities as required.

⁹ NSW EPA, (2014). *Waste Classification Guidelines, Part 1: Classifying Waste*. (referred to as Waste Classification Guidelines 2014)

5 REMEDIATION EXTENT

For the purpose of the RAP, it has been assumed that that all fill soil beneath the P2 MSCP are impacted with friable asbestos (AF/FA) and remediation is required. The extent of remediation will be further assessed by the post-demolition validation assessment.

JKE note that all boreholes drilled within the P2 MSCP footprint were terminated within the fill, due to the use of hand tools at sampling locations inaccessible to a drill rig. JKE Stage 2 ESA are shown on Figure 2 attached in Appendix C.

6 REMEDIATION OPTIONS

6.1 Soil Remediation

The NSW EPA follows the hierarchy set out in NEPM 2013 for the remediation of contaminated sites. The preferred order for soil remediation and management is as follows:

1. On-site treatment of soil so that the contaminant is either destroyed or the associated hazard is reduced to an acceptable level;
2. Off-site treatment of excavated material so that the contaminant is either destroyed or the associated hazard is reduced to an acceptable level, after which the soil is returned to the site;

Or if the above are not practicable:

3. Consolidation and isolation of the soil by on-site containment within a properly designed barrier; and
4. Removal of contaminated material to an approved site or facility, followed where necessary by replacement with clean material; or
5. Where the assessment indicates that remediation would have no net environmental benefit or would have a net adverse environmental effect, implementation of an appropriate management strategy.

For simplicity herein, the above hierarchy are respectively referred to as Option 1, Option 2, Option 3 etc.

The Guidelines for the NSW Site Auditor Scheme, 3rd Edition (2017)¹⁰ provides the following additional requirements to be taken into consideration:

- Remediation should not proceed in the event that it is likely to cause a greater adverse effect than leaving the site undisturbed; and
- Where there are large quantities of soil with low levels of contamination, alternative strategies should be considered or developed.

The NEPM 2013 and Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia (2009)¹¹ prefer the following asbestos remediation hierarchy:

1. Minimisation of public risk;
2. Minimisation of contaminated soil disturbance; and
3. Minimisation of contaminated material/soil moved to landfill.

¹⁰ NSW EPA (2017). *Guidelines for the NSW Site Auditor Scheme, 3rd ed.* (referred to as Site Auditor Guidelines 2017)

¹¹ Western Australian (WA) Department of Health (DoH), (2009). *Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia.* (referred to as WA DoH 2009)

6.2 Consideration of Remediation Options

The table below discusses a range of remediation options:

Table 6-1: Consideration of Remediation Options

Option	Discussion	Applicability
Option 1 On-site treatment of contaminated soil	<p>On-site treatment provides a mechanism to reuse the processed material and, in some instances, to avoid the need for large scale earthworks. Some of the treatment options include bio-remediation, soil washing, air sparging and soil vapour extraction, thermal desorption and physical removal of bonded ACM.</p> <p>Depending on the treatment option, licenses may be necessary for specific individual waste streams due to the potential for air pollution and the formation of harmful by-products during incineration processes.</p>	Not applicable for the contaminant of concern identified at the site.
Option 2 Off-site treatment of contaminated soil	<p>Contaminated soils are excavated, transported to an approved/ licensed treatment facility, treated to remove/stabilise the contaminants then returned to the subject site, transported to an alternative site or disposed to an approved landfill facility.</p> <p>This option provides for a relatively short program of on-site works, however there may be some delays if the material is to be returned to the site following treatment. The cost per tonne for transport to and from the site and for treatment is considered to be relatively high. The material would also have to be assessed in terms of suitability for reuse as part of the proposed development works under the waste and resource recovery regulatory framework.</p>	Not applicable for this project as noted above.
Option 3 Removal of contaminated material to an appropriate facility	Contaminated soils would be classified in accordance with NSW EPA guidelines for waste disposal, excavated and disposed of off-site to a NSW EPA licensed landfill. The material would have to meet the requirements for landfill disposal. Landfill gate fees (which may be significant) would apply in addition to transport costs.	<p>Considering that the proposed development includes significant earthworks across the entire site area, this option is considered to be the most practical, technically achievable and economically viable option for this project.</p> <p>JK Environments also understand that this is the preferred remediation option by Health Infrastructure.</p>

Option	Discussion	Applicability
Option 4 Consolidation and isolation of impacted soil by cap and containment	<p>This would include the placement of an impermeable barrier such as concrete/pavers etc, or a warning barrier and non-contaminated soil material, over the existing ground surface to isolate the contaminated material and thereby reduce the health risk to future site users. This action may also reduce the transport of contamination via surface water movement and dust generation.</p> <p>The capping and/or containment must be appropriate for the specific contaminants of concern. An ongoing Environmental Management Plan (EMP) would be required and site identification documentation, possibly including the Section 10.7 council planning certificate, land title or other appropriate statutory documentation, would be modified to note the presence of the contamination. This may impact upon development approval conditions, place restrictions on the use of the land and limit the future potential land value.</p>	Potentially applicable for the contaminants of concern (asbestos). However, may be onerous for Health Infrastructure.

6.3 Preferred Remediation Option and Rationale

The preferred option for remediation at the site is Option 3 – excavation and off-site disposal of the contaminated material. The contaminated fill should be excavated/removed prior to the commencement of earthworks in order to limit the potential for cross-contamination and blending of waste streams.

7 REMEDIATION DETAILS

Prior to commencement of any demolition, site preparation or remediation work within the site, a suitably qualified contaminated land consultant¹² should be engaged as the validation consultant to validate the implementation of the RAP.

7.1 Roles and Responsibilities

Table 7-1: Roles and Responsibilities

Role	Responsibility
Client/Developer	<p>To be confirmed.</p> <p>The client is required to appoint the project team for the remediation and must provide all investigation reports including this RAP to the project manager, remediation contractor, consent authority and any other relevant parties involved in the project.</p>
Project Manager	<p>To be appointed.</p> <p>The project manager is required to review all documents prepared for the project and manage the implementation of the procedures outlined in this RAP. The project manager is to take reasonable steps so that the remediation contractor and others have understood the RAP and will implement it in its totality. The project manager will review the RAP and other documents and will update the parties involved of any changes to the development or remediation sequence (in consultation with the validation consultant).</p>
Remediation Contractor	<p>To be appointed.</p> <p>The remediation contractor is required to review all documents prepared for the project, apply for any relevant removal licences or permits and implement the remediation requirements outlined in this RAP.</p> <p>The remediation contractor is required to collect all necessary documentation associated with the remediation activities and forward this documentation onto the client, project manager and validation consultant as it becomes available. Further details are outlined in the sections below.</p>
Validation Consultant	<p>JKE – subject to formal engagement Contact: Mitchell Delaney, Senior Associated Environmental Scientist</p> <p>The validation consultant provides consulting advice and validation services in relation to the remediation. The validation is required to review any deviation to this RAP or in the event of unexpected finds if and when encountered during the site work. The validation consultant is to have a SafeWork Licensed Asbestos Assessor on staff to provide the necessary surface clearance inspections and certificates for the project.</p> <p>The validation consultant is required to liaise with the client, project manager and remediation contractor on all matters pertaining to the site contamination, remediation and validation.</p>

¹² The consultant must be a certified practitioner (specialising in site contamination), under one of the NSW EPA endorsed certification schemes

7.2 Pre-commencement

The project team is to have a pre-commencement meeting to discuss the sequence of remediation, and the remediation and validation tasks. The site management plan for remediation works (see Section 10) should be reviewed by project manager and remediation contractor, and appropriate steps are to be taken to ensure the adequate implementation of the plan.

7.3 Sequence of Remediation Works

JKE anticipate the following general sequence of work for the project (in the context of the remediation):

1. Demolition and removal of structures and pavement;
2. Completion of the post-demolition validation investigation outlined in Section 4;
3. Remediation and validation of the fill contamination at the site; and
4. Validation of imported soil materials. This includes engineering material such as sub-base and drainage materials (e.g. recovered aggregate etc), or any other materials imported for service trenches etc.

7.4 Remediation Details – Preliminary Set up / Establishment

The fill is to be excavated to the full extent of the contamination areas which are to be confirmed by the post-demolition assessment. Advice should be obtained from the project engineers in order to facilitate this. Such advice may include, but would not be limited to, geotechnical advice in relation to shoring and/or structural advice in relation to adjoining structures and land.

The positioning of site sheds and entry/exit points for truck movements etc should be well thought out so as to facilitate the excavation and removal of fill from contamination areas.

7.5 Demolition of Buildings and Structures

Based on review of the latest NearMap¹³ aerial imagery, the Ron Dunbier Building appears to have been recently demolished. We understand that a destructive hazardous building materials survey is likely to be undertaken for the P2 MSCP. All demolition waste from any buildings/structures are to be disposed off-site to facilities that are appropriately licensed by the NSW EPA to receive the waste.

7.6 Remediation Details – Excavation and Disposal of Contaminated Fill

The procedure for excavation of contaminated fill soil is outlined below:

Table 7-2: Remediation Details – Excavation and disposal of contaminated fill

Step	Primary Role/Responsibility	Procedure
1.	Remediation contractor	<u>Personal Protective Equipment (PPE) and Work Health and Safety (WHS):</u> Check PPE and WHS requirements prior to commencement of remediation works. The minimum PPE required for the remediation at the site includes covered clothing, gloves, dust masks and steel cap boots. Other site/project specific PPE may be

¹³ <http://maps.au.nearmap.com/>, viewed 28 April 2020

Step	Primary Role/ Responsibility	Procedure
		required including hard hat, eye protection, steel toed boots etc and will be dependent on the requirements of the contractor for the site. Further PEE required for asbestos removal works including asbestos control measures, air monitoring etc. will be detailed in the AMP.
2.	Remediation contractor (or their nominated sub-contractor) and to be confirmed by the validation consultant	<p><u>Preparation of Excavation Area:</u> The extent of the areas to be excavated for off-site disposal should be clearly delineated on-site using pegs/star pickets or other appropriate means.</p>
3.	Remediation contractor (or their nominated sub-contractor) and validation consultant	<p><u>Removal of contaminated fill:</u> Excavation of the remediation area further assessed by the post-demolition validation investigation will be undertaken as follows:</p> <ul style="list-style-type: none"> • Submit an application to dispose the fill (in accordance with the assigned waste classification to be confirmed by the post-demolition validation works) to a landfill licensed by the NSW EPA to receive the waste and obtain authorisation to dispose; • A water system will need to be in place to spray the excavated soil during excavation/ remediation works and to decontaminate trucks entering the work area. The general site area should be kept damp during remediation works to minimise the generation of dust; • Asbestos related controls for asbestos removal works are to be implemented as per the AMP; • The remediation area should be excavated to the base of the fill and down to the surface of the underlying natural soil (or bedrock, whichever is encountered first). The works should be done in the most efficient manner that minimises cross contamination. We note that the natural soil/rock levels may vary across the site and provisions will need to be made for careful, detailed excavation and removal of all fill. Even minor amount of fill, if left present at the surface, will result in validation failure and the need for further excavation; • Load the fill onto trucks and dispose in accordance with the assigned waste classification. The receiving licenced landfill facility; • The validation consultant is to obtain validation samples from the base and walls of the remediation excavation to demonstrate that the contaminated fill has been removed and that the underlying natural soil is VENM (see the Validation Plan in Section 8); • The occurrence of unexpected finds (staining/odours, asbestos in areas where not anticipated etc) during the soil removal are to be documented and addressed with regards to Section 9; • If any temporary backfilling/reinstatement is required, this is to occur using clean/validated materials. Preferably the backfill would be sourced from on-site. However, if materials are imported for this purpose, the imported materials must be validated in accordance with the Validation Plan in Section 8; and • All documents including landfill disposal dockets should be retained by the remediation contractor and forwarded to the client and validation consultant. This documentation forms a key part of the validation process and is to be included in the validation report.

Step	Primary Role/ Responsibility	Procedure
4.	Remediation contractor (or their nominated sub-contractor)	<p><u>Isolation/Quarantining of Validated Areas:</u></p> <p>Following excavation of fill and validation of the excavated area, the area should be appropriately isolated/quarantined from the adjoining areas to limit the potential for cross-contamination that could occur via the movement of vehicles and machinery. This could include the installation of temporary fences (e.g. barrier mesh).</p> <p>Any haul routes established to transport contaminated material off site should be suitably defined/established to prevent cross contamination to other areas of the site.</p>

7.7 Disposal Requirements

The fill must be disposed of to a waste facility licensed by the NSW EPA to receive the waste stream. The waste classification for the site will be updated by the post-demolition validation assessment (as outlined in Section 4) must be used to facilitate the lawful disposal of the waste.

7.8 Remediation Documentation

The construction/remediation contractor must keep records and retain all documentation associated with the remediation, including but not limited to:

- Waste/surplus soil disposal dockets;
- Asbestos management documentation, including all relevant notifications, licences, clearance certificates and air monitoring reports (additional details in this regard are to be outlined in the AMP);
- Imported materials information;
- Photographs of remediation works; and
- Waste tracking documentation.

Copies of the documents must be forwarded to the validation consultant on completion of the remediation for inclusion in the validation report.

Any waste movements should be documented. A waste tracking proforma is attached in Appendix D. Copies of the documents must be forwarded to the validation consultant on completion of the remediation for inclusion in the validation report.

7.9 Soil Disposal - Volume and Disposal Analysis

A soil volume analysis should be undertaken on completion of the validation works and reconciled with the quantities shown on the soil disposal dockets. This information is to be reviewed by the validation consultant on completion of the works and an assessment of the quantities of soil disposed off-site (e.g. comparison with the estimated and actual volumes) is to be included in the waste classification report. A review of the

disposal facility's licence issued under the Protection of the Environment Operations (POEO) Act (1997)¹⁴ should also be undertaken to assess whether the facility is appropriately licensed to receive the waste.

An estimate of the fill soil volumes for each of the waste streams is to be provided in the post-demolition validation assessment report.

¹⁴NSW Government, (1997)). *Protection of Environment Operations Act*. (referred to as POEO Act 1997)

8 VALIDATION PLAN

Validation is necessary to demonstrate that remedial measures described in this RAP have been successful and that the site is suitable for the intended land use. The validation can be staged if required, depending on the sequence of excavation.

The sampling and documentation requirements for the validation are outlined in Section 8.1. These are the minimum requirements based on conditions anticipated to exist at the site. Additional validation sampling may be required based on site observations made during remediation. Site observations will also be used as a validation tool to assess the extent of site contamination.

8.1 Validation Sampling and Documentation

The table below outlines the validation requirements for the site.

Table 8-1: Validation Requirements

Aspect	Sampling	Analysis	Observations and Documentation
<i>Demolition of Buildings and Structures (Section 7.5)</i>			
Demolition of structures	As per the hazardous building materials reports	As per the hazardous building materials reports	Copy of destructive hazardous building materials report to be provided to the validation consultant along with any monitoring and/or clearance reports from the demolition. Letter of compliance is required from the demolition contractor confirming that the demolition occurred with regards to the hazardous building materials reports.
<i>Post-demolition Validation Assessment (Section 4.2 – Additional Soil Sampling Beneath the P2 MSCP)</i>			
Soil sampling	As per Section 4.2	Asbestos (500ml), heavy metals, TRH/BTEX, PAHs, OCPs, OPPs, PCBs	Post-demolition investigation report to be prepared by the validation consultant presenting the results and recommendations. Waste classification assessment to be included.
<i>Excavation and off-site Disposal of Asbestos Contaminated Fill (Section 7.6)</i>			
Validation following removal asbestos contaminated fill	Base sample to include min of two samples per excavation, or at least one sample per 10m ² (~3m x 3m grid), whichever is greater. Wall sampling at a minimum of 1 sample per wall but no less than one sample per	Asbestos (500ml) and No visible FCF observed within walls of the based on the excavation	Observations of staining and odour to be recorded. Photographs to be taken. Visual asbestos clearance certificate/s and asbestos air fibre monitoring results to be undertaken and provided. Disposal dockets to be retained.

Aspect	Sampling	Analysis	Observations and Documentation
	5m lineal length. Sampling is to target the same depth/profile where the initial exceedance was encountered.		
Imported Materials – validation of imported materials is required for any materials imported onto the site during the remediation and to the point in time that the site validation report is prepared (e.g. gravels for site preparation, basecourse, landscaping materials, VENM, backfill for service trenches etc).			
Imported VENM backfill (if required)	Minimum of three samples per source. Additional sampling may be required at the validation consultant's discretion based on robustness of supplier documentation/ VENM report.	Asbestos (presence/absence), heavy metals, TRH/BTEX, PAHs, OCPs, OPPs, PCBs. Additional analysis may be required depending on the site history of the source property.	VENM documentation/report required from the remediation contractor. The documentation/report must be provided to the validation consultant prior to importation to the site. The provided documentation/report should include source site history to demonstrate analytes are appropriate. Photographs of the VENM at the source site. The VENM material is to be inspected upon importation by the validation consultant to confirm it is free of visible/olfactory indicators of contamination and is consistent with documentation. Photographic documentation and an inspection log are to be maintained. Where check sampling occurs by the validation consultant due to deficiencies or irregularities in existing VENM documentation, the following is required: <ul style="list-style-type: none"> - Date of sampling and description of material sampled; - An estimate of the volume of material imported at the time of sampling; - Sample location plan; and - Analytical reports and tabulated results with comparison to the validation assessment criteria (VAC).
Imported engineering materials such as recycled aggregate, road base etc or Excavated Natural Material (ENM)	Minimum of three samples per source/material type. Additional testing may be required for ENM to meet the specification within the ENM Order.	Heavy metals (as above), TRHs, BTEX, PAHs, OCP/OPP, PCBs and asbestos (presence/absence). Additional testing may be required for ENM (e.g. foreign materials, pH and	Documentation required to confirm material has been classified with reference to a relevant Resource Recovery Order/Exemption. Review of the facility's Environment Protection Licence (EPL). Photographs of the ENM at the source site.

Aspect	Sampling	Analysis	Observations and Documentation
		electrical conductivity) depending on available documentation.	<p>Material is to be inspected by the validation consultant upon importation to confirm it is free of visible/olfactory indicators of contamination and is consistent with documentation.</p> <p>Dockets for imported material to be provided.</p> <p>Where check sampling occurs by the validation consultant due to deficiencies or irregularities in existing documentation, the following is required:</p> <ul style="list-style-type: none"> - Date of sampling and description of material sampled; - An estimate of the volume of material imported at the time of sampling; - Sample location plan; and - Analytical reports and tabulated results with comparison to the VAC.
Imported engineering materials comprising only natural quarried products.	At the validation consultant's discretion based on robustness of supplier documentation.	At the validation consultant's discretion based on robustness of supplier documentation.	<p>Documentation to be provided from the supplier confirming the material is a product comprising only VENM (i.e. natural quarried product).</p> <p>Review of the quarry's EPL.</p> <p>Material is to be inspected by the validation consultant upon importation to confirm it is free of anthropogenic materials, visible and olfactory indicators of contamination, and is consistent with documentation.</p> <p>Dockets for imported material to be provided.</p> <p>Where check sampling occurs by the validation consultant due to deficiencies or irregularities in existing documentation, the following is required:</p> <ul style="list-style-type: none"> - Date of sampling and description of material sampled; - An estimate of the volume of material imported at the time of sampling; - Sample location plan; and - Analytical reports and tabulated results with comparison to the VAC.

Aspect	Sampling	Analysis	Observations and Documentation
Imported landscaping materials, including mulches, topsoil, garden mix etc	<p>Minimum of three samples per source/material type.</p> <p>Additional sampling may be required at the validation consultant's discretion based on robustness of supplier documentation.</p>	Heavy metals (as above), TRHs, BTEX, PAHs, OCP/OPP, PCBs and asbestos (presence/absence).	<p>Documentation required to confirm material has been produced under an appropriate Australian Standard or similar.</p> <p>Material is to be inspected by the validation consultant upon importation to confirm it is free of visible/olfactory indicators of contamination and is consistent with documentation.</p> <p>Dockets for imported material to be provided.</p> <p>Where check sampling occurs by the validation consultant due to deficiencies or irregularities in existing documentation, the following is required:</p> <ul style="list-style-type: none"> - Date of sampling and description of material sampled; - An estimate of the volume of material imported at the time of sampling; - Sample location plan; and - Analytical reports and tabulated results with comparison to the VAC.

8.2 Validation Assessment Criteria and Data Assessment

The validation assessment criteria (VAC) to be adopted for the validation assessment are outlined in the table below:

Table 8-2: VAC

Validation Aspect	Criteria
Waste classification	In accordance with the procedures and criteria outlined in the NSW EPA Waste Classification Guidelines 2014.
Soil validation	<p>The soil validation criteria to be adopted for the proposed development at the site will be the health-based investigation/screening levels for land use type A (residential with accessible soils' HILs/HSLs). These have been selected as a screening tool. Alternate land use VAC may be considered on a case by case basis.</p> <p>JKE note that the Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia (2009)¹⁵ (endorsed in NEPM 2013), HSL criteria for asbestos fines/fibrous asbestos (AF/FA) in soil is <0.001% w/w for all land use scenarios.</p>
Imported materials	Material imported as general fill must only be VENM or ENM. VENM is defined in the Protection of the Environment Operations Act (1997) ¹⁶ as material:

¹⁵ Western Australian (WA) Department of Health (DoH), (2009). Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia. (referred to as WA DoH 2009)

¹⁶ Protection of Environment Operations Act 1997 (NSW) (PEO Act 1997)

Validation Aspect	Criteria
	<ul style="list-style-type: none"> • That has been excavated or quarried from areas that are not contaminated with manufactured chemicals, or with process residues, as a result of industrial, commercial mining or agricultural activities; • That does not contain sulfidic ores or other waste; and • Includes excavated natural material that meets such criteria for virgin excavated natural material as may be approved from time to time by a notice published in the NSW Government Gazette. <p>ENM and recycled materials are to meet the criteria of the relevant exemption/order under which they are produced.</p> <p>Analytical results for VENM and other imported materials will need to be consistent with expectations for those materials. For VENM, it is expected that:</p> <ul style="list-style-type: none"> - Heavy metal concentrations are to be less than the most conservative Added Contaminant Limit (ACL) concentrations for an urban residential and public open space exposure setting presented in Schedule B1 of the NEPM 2013; and - Organic compounds are to be less than the laboratory PQLs and asbestos to be absent. <p>All materials imported onto the site must also be adequately assessed as being appropriate for the final use of the site. A risk-based assessment approach is to be adopted with regards to the tier 1 screening criteria presented in Schedule B1 of NEPM 2013.</p> <p>Aesthetics: all imported materials are to be free of staining and odours.</p>

Data should initially be assessed as above or below the VAC. Statistical analysis may be applied if deemed appropriate by the consultant and undertaken in accordance with the NEPM (2013).

For imported materials, further assessment of risk can be considered in relation to site specific circumstances/application and available documentation for each material type, although such assessment and importation/use of materials on site should not be contrary to waste exemptions/orders or waste definitions.

8.3 Data Quality

Appropriate QA/QC samples should be obtained during the validation (where applicable) and analysed for the contaminants of concern. As a minimum, QA/QC sampling should include duplicates (5% inter-laboratory and 5% intra-laboratory), trip spikes, trip blanks and rinsate samples.

Data Quality Objectives (DQOs) and Data Quality Indicators (DQIs) should be clearly outlined and assessed as part of the validation process. A framework for the DQO and DQI process is outlined below and should be reflected in the validation report.

DQOs should be established for the validation with regards to the seven-step process outlined in the Site Auditor Guidelines 2006 and with reference to USEPA documents Data Quality Objectives Processes for

Hazardous Waste Site Investigations (2000) and Guidance on Systematic Planning Using the Data Quality Objectives Process (2006). The seven steps include the following:

- State the problem;
- Identify the decisions/goal of the study;
- Identify information inputs;
- Define the study boundary;
- Develop the analytical approach/decision rule;
- Specify the performance/acceptance criteria; and
- Optimise the design for obtaining the data.

DQIs are to be assessed based on field and laboratory considerations for precision, accuracy, representativeness, completeness and comparability.

8.4 Validation Report

As part of the validation process (in addition to the post-demolition validation reporting requirements outlined in Section 4), a site validation report will be prepared on completion of remediation and validation by the validation consultant. The report will outline the remediation work undertaken at the site and any deviations to the remediation strategy. The report will present the results of the validation assessment and will be prepared in accordance with the NSW EPA Guidelines for Consultants Reporting on Contaminated Sites (2020)¹⁷.

The validation report should draw conclusions regarding the success of the remediation/validation and the suitability of the site for the proposed development (from a contamination viewpoint).

¹⁷ NSW EPA, (2020). Guidelines for Consultants Reporting on Contaminated Sites (referred to as Reporting Guidelines 2020)

9 CONTINGENCY PLAN

A review of the proposed remediation works has indicated that the greatest risks that may affect the success of the remediation include identification of unexpected finds. Contingency plans to address these risks are outlined below, in conjunction with a selection of other contingencies that may apply to this project.

9.1 Unexpected Finds

Residual hazards that may exist at the site would generally be expected to be detectable through visual or olfactory means. At this site, these types of hazards may include: underground tanks, soil impacted by asbestos (other than that known) and odorous or stained hydrocarbon impacted soils.

The procedure to be followed in the event of an unexpected find is presented below:

- In the event of an unexpected find, all work in the immediate vicinity should cease and the client should be contacted immediately;
- Temporary barricades should be erected to isolate the area from access to the public and workers;
- The client should engage the validation consultant to attend the site and assess the extent of remediation that may be required and/or adequately characterise the contamination in order to allow for remediation of the material;
- In the event additional remediation is required, the procedures outlined within this report should be adopted where appropriate. Alternatively, an addendum RAP or RWP should be prepared;
- An additional sampling and analytical rationale should be established by the consultant and should be implemented with reference to the relevant guideline documents; and
- Appropriate validation sampling should be undertaken and the results should be included in the validation report.

9.2 Continual Validation Failure (after fill removal)

In the event of a soil validation failure when validating fill removal, the client should be advised then the excavation should be extended in the direction of the failure (in consultation with the validation consultant, client and other relevant stakeholders) and the area re-validated.

9.3 Importation Failure for Imported Materials

Where material to be imported onto the site does not meet the importation acceptance criteria detailed in Section 8, the only option is to not accept the material. Alternative material must be sourced that meets the importation requirements.

10 SITE MANAGEMENT PLAN FOR REMEDIATION WORKS

The information outlined in this section of the RAP is for the remediation work only. The client should make reference to the development consent for specific site management requirements for the overall development of the site.

10.1 Asbestos Management Plan

Prior to the commencement of any soil disturbance in the remediation areas, a remediation/construction-phase AMP is to be prepared to document the asbestos-related management requirements for the remediation.

10.2 Interim Site Management

The JKE IAMP is to be implemented for the site prior to the commencement of remediation. No further interim site management measures are considered necessary at this stage.

10.3 Project Contacts

Emergency procedures and contact telephone numbers should be displayed in a prominent position at the site entrance gate and within the main site working areas. The contact details of key project personnel are summarised in the following table:

Table 10-1: Project Contacts

Role	Company	Contact Details
Project Manager	To be appointed	-
Remediation Contractor	To be appointed	-
Validation Consultant	JKE (at the time of the RAP preparation)	Mitch Delaney Senior Associate mdelaney@jkenvironments.com.au P: 9888 5000
Certifier	To be appointed	-
NSW EPA	Pollution Line	131 555
Emergency Services	Ambulance, Police, Fire	000

10.4 Security

Prior to the commencement of site works, fencing should be installed as required to secure the remediation areas. Warning signs should be erected, which outline the PPE required for remediation work.

10.5 Timing and Sequencing of Remediation Works

The anticipated sequence of remediation works is outlined in Section 7.3. The buildings and structures at the site will need to be demolished to allow site access for the poste-demolition assessment and for remediation works to occur.

10.6 Site Soil and Water Management Plan

The contractor should prepare a detailed soil and water management plan prior to the commencement of site works. Silt fences should be used to control the surface water runoff at all appropriate locations of the site.

All stockpiled materials (if applicable) should be placed within an erosion containment boundary with silt fences and sandbags employed to limit sediment movement. The containment area should be located away from drainage lines, gutters, stormwater pits and inlets and the site boundaries. No liquid waste or runoff should be discharged to the stormwater or sewerage system without the approval of the appropriate authorities.

10.7 Noise and Vibration Control Plan

The guidelines for minimisation of noise on construction sites outlined in AS-2460 (2002)¹⁸ should be adopted. Other measures specified in the consent conditions should also be complied with. Noise producing machinery and equipment should only be operated between the hours approved by Council (refer to consent documents).

All practicable measures should be taken to reduce the generation of noise and vibration to within acceptable limits. In the event that short-term noisy operations are necessary, and where these are likely to affect residences, notifications should be provided to the relevant authorities and the residents by the project manager, specifying the expected duration of the noisy works.

10.8 Dust Control Plan

All practicable measures should be taken to reduce dust emanating from the site. Factors that contribute to dust production are:

- Wind over a cleared surface;
- Wind over stockpiled material; and
- Movement of machinery in unpaved areas.

¹⁸ Australian Standard, (2002). *AS2460: Acoustics - Measurement of the Reverberation Time in Rooms*.

Visible dust should not be present at the site boundaries. Measures to minimise the potential for dust generation include:

- Use of water sprays on unsealed or exposed soil surfaces;
- Covering of stockpiled materials and excavation faces (particularly during periods of site inactivity and/or during windy conditions) or alternatively the erection of hessian fences around stockpiled soil or large exposed areas of soil;
- Establishment of dust screens consisting of a 2m high shade cloth or similar material secured to a chain wire fence;
- Maintenance of dust control measures to keep the facilities in good operating condition;
- Concrete surfaces brushed or washed to remove dust;
- Stopping work during strong winds;
- Loading or unloading of dry soil as close as possible to stockpiles to prevent spreading of loose material around the site; and
- The expanse of cleared land should be kept to a minimum to achieve a clean and economical working environment.

If stockpiles are to remain on-site or an excavation remains open for a period of longer than several days, dust monitoring should be undertaken at the site. If excessive dust is generated all site activities should cease until either wind conditions are more acceptable or a revised method of excavation/remediation is developed.

Dust is also produced during the transfer of material to and from the site. All material should be covered during transport and should be properly disposed of on delivery. No material is to be left in an exposed, un-monitored condition.

All equipment and machinery should be brushed or washed down before leaving the site to limit dust and sediment movement off-site. In the event of prolonged rain and lack of paved areas all vehicles should be washed down prior to exit from the site, and any soil or dirt on the wheels of the vehicles removed. Water used to clean the vehicles should be collected and tested prior to appropriate disposal under the Waste Classification Guidelines 2014.

10.9 Air Monitoring

Reference is to be made to the remediation/construction-phase AMP for details regarding asbestos air fibre monitoring. Air monitoring must only be carried out by personnel registered and accredited by NATA (National Association of Testing Authorities). Filter analysis must only be carried out within a NATA certified laboratory. The monitoring results must conform to the requirements of the NOHSC Guidance note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC:3003 (2005)].

The monitoring program will be used to assess whether the control procedures being applied are satisfactory and that criteria for airborne asbestos fibre levels are not being exceeded. The following levels will be used as action criteria during the air monitoring:

- <0.01 Fibres/ml: Work procedures deemed to be successful;
- 0.01 to 0.02 Fibres/ml: Inspection of the site and review of procedures; and
- >0.02 Fibres/ml: Stop work, inspection of the site, review of procedures, clean-up, rectification works where required and notify the relevant regulator.

10.10 Odour Control Plan

All activities undertaken at the site should be completed in a manner that minimises emissions of smoke, fumes and vapour into the atmosphere and any odours arising from the works or stockpiled material should be controlled. Control measures may include:

- Maintenance of construction equipment so that exhaust emissions comply with the Clean Air Regulations issued under the Protection of the Environment Operations (POEO) Act 1997;
- Demolition materials and other combustible waste should not be burnt on site;
- The spraying of a suitable proprietary product to suppress any odours that may be generated by excavated materials; and
- Use of protective covers (e.g. builder's plastic).

All practicable measures should be taken to reduce fugitive emissions emanating from the site so that associated odours do not constitute a nuisance and that the ambient air quality is not adversely impacted.

The following odour management plan should be implemented to limit the exposure of site personnel and surrounding residents to unpleasant odours:

- Excavation and stockpiling of material should be scheduled during periods with low winds if possible;
- A suitable proprietary product could be sprayed on material during excavation and following stockpiling to reduce odours (subject to an appropriate assessment of the product by the validation consultant);
- All complaints from workers and neighbours should be logged and a response provided. Work should be rescheduled as necessary to minimise odour problems;
- The site foreman should consider the following odour control measures as outlined in NEPM:
 - reduce the exposed surface of the odorous materials;
 - time excavation activities to reduce off-site nuisance (particularly during strong winds); and
 - cover exposed excavation faces overnight or during periods of low excavation activity.
- If continued complaints are received, alternative odour management strategies should be considered and implemented.

10.11 Dewatering

Temporary dewatering is not anticipated to be required as part of the remediation works. If a rain event occurs, this water should be managed appropriately on site in accordance with the remediation contractor's soil and water management plan. This water should not be pumped to stormwater or sewer unless a prior application is made and this is approved by the relevant authorities.

10.12 WHS Plan

A site specific WHS plan should be prepared by the contractor for all work to be undertaken at the site. The WHS plan should meet all the requirements outlined in SafeWork NSW WHS regulations.

As a minimum requirement, personnel must wear appropriate protective clothing, including long sleeve shirts, long trousers, steel cap boots and hard hats. Additional asbestos-related PPE will be required and this will be specified in the remediation/construction-phase AMP. Washroom and lunchroom facilities should also be provided to allow workers to remove potential contamination from their hands and clothing prior to eating or drinking.

10.13 Waste Management

Prior to commencement of remedial works and excavation for the proposed development, the remediation contractor should develop a waste management or recycling plan to minimise the amount of waste produced by the site. This should, as a minimum, include measures to recycle and re-use natural excavated material wherever possible.

10.14 Incident Management Contingency

The validation consultant should be contacted if any unexpected conditions are encountered at the site. This should enable the scope of remedial/validation works to be adjusted as required. Similarly, if any incident occurs on site, the validation consultant should be advised to assess potential impacts on site contamination conditions and the remediation/validation timetable.

10.15 Hours of Operation

Hours of operation should be between those approved by the consent authority under the development approval process.

11 CONCLUSION

JKE are of the opinion that the site can be made suitable for the proposed development provided this RAP is implemented. A site validation report is to be prepared on completion of remediation activities and submitted to the consent authority to demonstrate that the site is suitable for the proposed development.

11.1 Remediation Category

Site remediation can fall under the following two categories outlined in SEPP55:

Table 11-1: Remediation Category

Category	Details
Category 1	<p>Category 1 remediation works are those undertaken in the following areas specified under Clause 9 of SEPP55:</p> <ul style="list-style-type: none"> • A designated development; • Carried out on land declared to be a critical habitat; • Development for which another SEPP or REP requires a development consent; or • Carried out in an area or zone classified as: <ul style="list-style-type: none"> ➢ Coastal Protection; ➢ Conservation or heritage conservation; ➢ Habitat protection, or habitat or wildlife corridor; ➢ Environmental protection; ➢ Escarpment protection or preservation; ➢ Floodway or wetland; ➢ Nature reserve, scenic area or scenic protection; etc. • Work that is not carried out in accordance with the site management provisions contained in the consent authority Development Control Plan (DCP)/Local Environmental Plan (LEP) etc. <p>Approval is required from the consent authority for Category 1 remediation work. The RAP needs to be assessed as part of the development consent. Category 1 remediation work is identified as advertised development work unless the remediation work is a designated development or a state significant development (Clause 13 of SEPP55).</p>
Category 2	<p>Remediation works which do not fall under the above category are classed as Category 2. Development consent is not required for Category 2 remediation works, however the consent authority should be given 30 days' notice prior to commencement of works.</p>

Based on the above, JKE have assessed that the remediation falls within Category 1. Further information is provided in Section 11.2.

11.2 Regulatory Requirements

The regulatory requirements applicable for the site are outlined in the following table:

Table 11-2: Regulatory Requirement

Guideline / Legislation / Policy	Applicability
SEPP55	JKE have assessed that the remediation falls within Category 1, as the proposed development has been identified as a SSDA under the Stage and Regional Development SEPP and development consent is required from the NSW Department of Planning, Industry and Environment, under the <i>Environmental Planning & Assessment Act 1997</i> . This should be confirmed by the client's planner.
Duty to Report Contamination (2015)¹⁹	At this stage, JKE consider that there is no requirement to notify the NSW EPA of the site contamination. This requirement should be reassessed following review of the validation results.
POEO Act 1997	<p>Section 143 of the POEO Act 1997 states that if waste is transported to a place that cannot lawfully be used as a waste facility for that waste, then the transporter and owner of the waste are each guilty of an offence. The transporter and owner of the waste have a duty to ensure that the waste is disposed of in an appropriate manner.</p> <p>Appropriate waste tracking is required for all waste that is disposed off-site.</p> <p>Activities should be carried out in a manner which does not result in the pollution of waters.</p>
POEO (Waste) Regulation 2014	<p>Part 7 of the POEO Waste Regulation 2014 set outs the requirements for the transportation and management of asbestos waste and Clause 79 of the POEO Waste Regulation requires waste transporters to provide information to the NSW EPA regarding the movement of any load in NSW of more than 10 square meters of asbestos sheeting, or 100 kilograms of asbestos waste. To fulfil these legal obligations, asbestos waste transporters must use WasteLocate.</p> <p>Clause 78 of the POEO Waste Regulation requires that a person who transport asbestos waste must ensure that:</p> <ul style="list-style-type: none"> Any part of any vehicle in which the person transports the waste is covered, and leak-proof, during the transportation; and If the waste consists of bonded asbestos material—it is securely packaged during the transportation; and If the waste consists of friable asbestos material—it is kept in a sealed container during transportation; and If the waste consists of asbestos-contaminated soils—it is wetted down. <p>Asbestos waste in any form cannot be re-used or recycled.</p>
SafeWork NSW Code of Practice: How to manage and control asbestos in the workplace (2019)	Sites with asbestos become a 'workplace' when work is carried out there and require a register and AMP. Appropriate SafeWork NSW notification will be required for asbestos removal works or handling. Contractors are also required to be appropriately licensed for the asbestos works undertaken (i.e. Class A licence for friable asbestos work).

¹⁹ NSW EPA, (2015), *Guidelines on the Duty to Report Contamination under the Contamination Land Management Act 1997*. (referred to as Duty to Report Contamination 2015)

12 LIMITATIONS

The report limitations are outlined below:

- JKE accepts no responsibility for any unidentified contamination issues at the site. Any unexpected problems/subsurface features that may be encountered during development works should be inspected by an environmental consultant as soon as possible;
- Previous use of this site may have involved excavation for the foundations of buildings, services, and similar facilities. In addition, unrecorded excavation and burial of material may have occurred on the site. Backfilling of excavations could have been undertaken with potentially contaminated material that may be discovered in discrete, isolated locations across the site during construction work;
- This report has been prepared based on site conditions which existed at the time of the investigation; scope of work and limitation outlined in the JKE proposal; and terms of contract between JKE and the client (as applicable);
- The conclusions presented in this report are based on investigation of conditions at specific locations, chosen to be as representative as possible under the given circumstances, visual observations of the site and immediate surrounds and documents reviewed as described in the report;
- Subsurface soil and rock conditions encountered between investigation locations may be found to be different from those expected. Groundwater conditions may also vary, especially after climatic changes;
- The investigation and preparation of this report have been undertaken in accordance with accepted practice for environmental consultants, with reference to applicable environmental regulatory authority and industry standards, guidelines and the assessment criteria outlined in the report;
- Where information has been provided by third parties, JKE has not undertaken any verification process, except where specifically stated in the report;
- JKE has not undertaken any assessment of off-site areas that may be potential contamination sources or may have been impacted by site contamination, except where specifically stated in the report;
- JKE accept no responsibility for potentially asbestos containing materials that may exist at the site. These materials may be associated with demolition of pre-1990 constructed buildings or fill material at the site;
- JKE have not and will not make any determination regarding finances associated with the site;
- Additional investigation work may be required in the event of changes to the proposed development or landuse. JKE should be contacted immediately in such circumstances;
- Material considered to be suitable from a geotechnical point of view may be unsatisfactory from a soil contamination viewpoint, and vice versa; and
- This report has been prepared for the particular project described and no responsibility is accepted for the use of any part of this report in any other context or for any other purpose.

Important Information About This Report

These notes have been prepared by JKE to assist with the assessment and interpretation of this report.

The Report is based on a Unique Set of Project Specific Factors

This report has been prepared in response to specific project requirements as stated in the JKE proposal document which may have been limited by instructions from the client. This report should be reviewed, and if necessary, revised if any of the following occur:

- The proposed land use is altered;
- The defined subject site is increased or sub-divided;
- The proposed development details including size, configuration, location, orientation of the structures or landscaped areas are modified;
- The proposed development levels are altered, eg addition of basement levels; or
- Ownership of the site changes.

JKE will not accept any responsibility whatsoever for situations where one or more of the above factors have changed since completion of the assessment. If the subject site is sold, ownership of the assessment report should be transferred by JKE to the new site owners who will be informed of the conditions and limitations under which the assessment was undertaken. No person should apply an assessment for any purpose other than that originally intended without first conferring with the consultant.

Changes in Subsurface Conditions

Subsurface conditions are influenced by natural geological and hydrogeological process and human activities. Groundwater conditions are likely to vary over time with changes in climatic conditions and human activities within the catchment (e.g. water extraction for irrigation or industrial uses, subsurface waste water disposal, construction related dewatering). Soil and groundwater contaminant concentrations may also vary over time through contaminant migration, natural attenuation of organic contaminants, ongoing contaminating activities and placement or removal of fill material. The conclusions of an assessment report may have been affected by the above factors if a significant period of time has elapsed prior to commencement of the proposed development.

This Report is based on Professional Interpretations of Factual Data

Site assessments identify actual subsurface conditions at the actual sampling locations at the time of the investigation. Data obtained from the sampling and subsequent laboratory analyses, available site history information and published regional information is interpreted by geologists, engineers or environmental scientists and opinions are drawn about the overall subsurface conditions, the nature and extent of contamination, the likely impact on the proposed development and appropriate remediation measures.

Actual conditions may differ from those inferred, because no professional, no matter how qualified, and no subsurface exploration program, no matter how comprehensive, can reveal what is hidden by earth, rock and time. The actual interface between materials may be far more gradual or abrupt than an assessment indicates. Actual conditions in areas not sampled may differ from predictions. Nothing can be done to prevent the unanticipated, but steps can be taken to help minimise the impact. For this reason, site owners should retain the services of their consultants throughout the development stage of the project, to identify variances, conduct additional tests which may be needed, and to recommend solutions to problems encountered on site.

Assessment Limitations

Although information provided by a site assessment can reduce exposure to the risk of the presence of contamination, no environmental site assessment can eliminate the risk. Even a rigorous professional assessment may not detect all contamination on a site. Contaminants may be present in areas that were not surveyed or sampled, or may migrate to areas which showed no signs of contamination when sampled. Contaminant analysis cannot possibly cover every type of contaminant which may occur; only the most likely contaminants are screened.

Misinterpretation of Site Assessments by Design Professionals

Costly problems can occur when other design professionals develop plans based on misinterpretation of an assessment report. To minimise problems associated with misinterpretations, the environmental consultant should be retained to work with appropriate professionals to explain relevant findings and to review the adequacy of plans and specifications relevant to contamination issues.

Logs Should not be Separated from the Assessment Report

Borehole and test pit logs are prepared by environmental scientists, engineers or geologists based upon interpretation of field conditions and laboratory evaluation of field samples. Logs are normally provided in our reports and these should not be re-drawn for inclusion in site remediation or other design drawings, as subtle but significant drafting errors or omissions may occur in the transfer process. Photographic reproduction can eliminate this problem, however contractors can still misinterpret the logs during bid preparation if separated from the text of the assessment. If this occurs, delays, disputes and unanticipated costs may result. In all cases it is necessary to refer to the rest of the report to obtain a proper understanding of the assessment. Please note that logs with the 'Environmental Log' header are not suitable for geotechnical purposes as they have not been peer reviewed by a Senior Geotechnical Engineer.

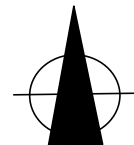
To reduce the likelihood of borehole and test pit log misinterpretation, the complete assessment should be available to persons or organisations involved in the project, such as contractors, for their use. Denial of such access and disclaiming responsibility for the accuracy of subsurface information does not insulate an owner from the attendant liability. It is critical that the site owner provides all available site information to persons and organisations such as contractors.

Read Responsibility Clauses Closely

Because an environmental site assessment is based extensively on judgement and opinion, it is necessarily less exact than other disciplines. This situation has resulted in wholly unwarranted claims being lodged against consultants. To help prevent this problem, model clauses have been developed for use in written transmittals. These are definitive clauses designed to indicate consultant responsibility. Their use helps all parties involved recognise individual responsibilities and formulate appropriate action. Some of these definitive clauses are likely to appear in the environmental site assessment, and you are encouraged to read them closely. Your consultant will be pleased to give full and frank answers to any questions.



Appendix A: Report Figures



LEGEND:

- APPROXIMATE SITE BOUNDARY AND EXTENT OF MULTI-STOREY CARPARK DEVELOPMENT

Title:

SITE LOCATION PLAN

Location:

LIVERPOOL HOSPITAL
ELIZABETH STREET, LIVERPOOL, NSW

Report No:

E32465BDrpt6-RAP

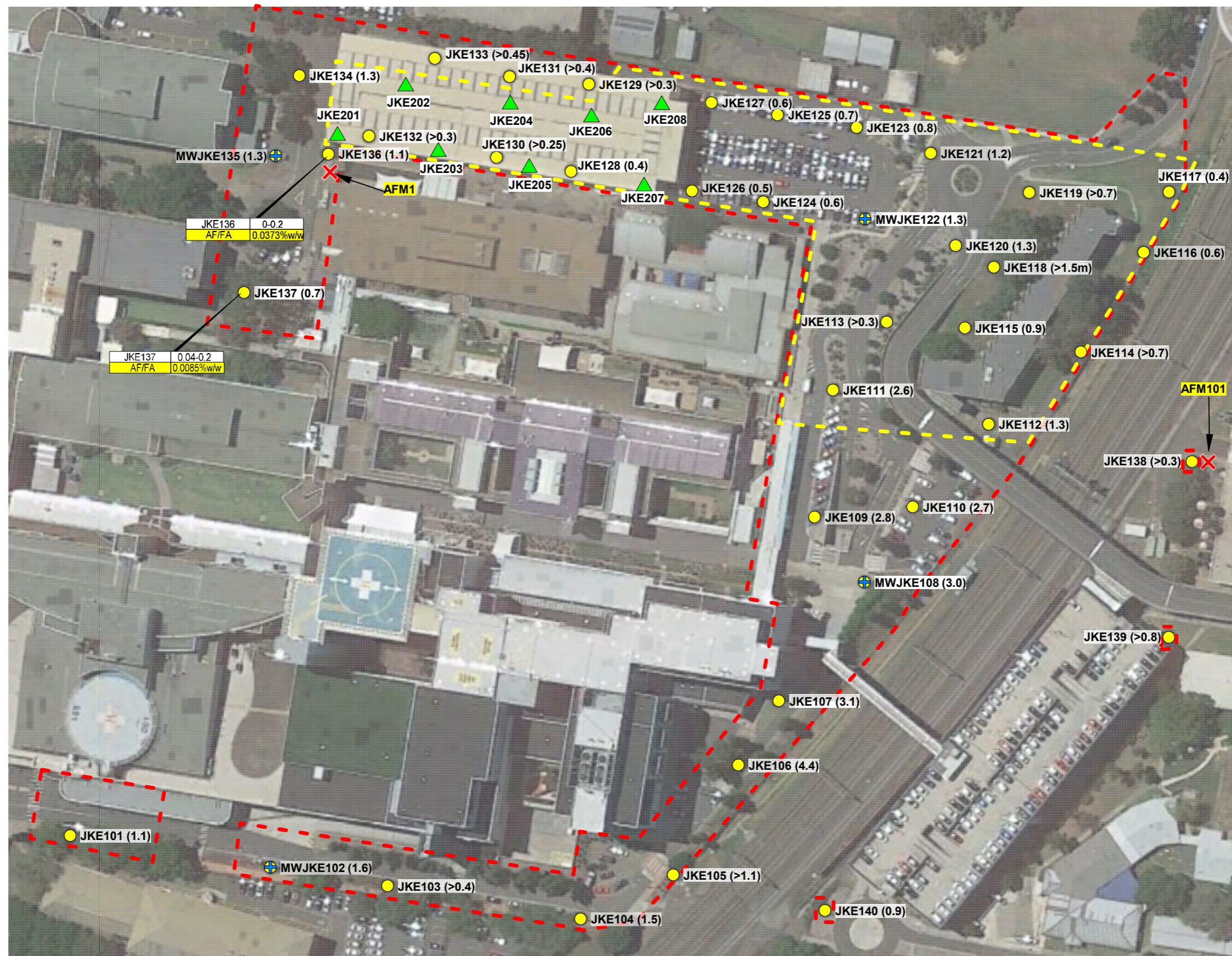
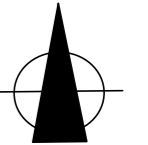
Figure No:

1

JK ENVIRONMENTS

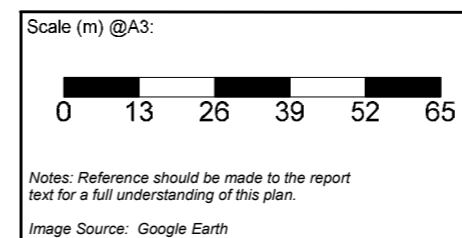


Notes: Reference should be made to the report text for a full understanding of this plan. Image Sources: <https://maps.six.nsw.gov.au/> and [wheris.com](https://www.wheris.com)



LEGEND:

- | | | | |
|---------------|--|----------|---|
| --- | APPROXIMATE SITE BOUNDARY AND EXTENT OF MULTI-STOREY CARPARK DEVELOPMENT | ▲ JKE200 | POST-DEMOLITION VALIDATION, PROPOSED BOREHOLE LOCATION AND NUMBER |
| --- | APPROXIMATE JKE STAGE 2 ESA (2019) SITE BOUNDARY | ✗ AMF | ASBESTOS SURFACE FRAGMENT LOCATION |
| ● JKE (0.1) | JKE STAGE 2 ESA (2019) BOREHOLE LOCATION, NUMBER AND DEPTH OF FILL (m) | ■ | SOIL CONTAMINATION ABOVE SAC FOR HUMAN HEALTH RISK (%W/W) |
| ⊕ MWJKE (0.1) | JKE STAGE 2 ESA (2019) BOREHOLE AND GROUNDWATER MONITORING WELL LOCATION, NUMBER AND DEPTH OF FILL (m) | | |



Title: PROPOSED POST-DEMOLITION VALIDATION SAMPLING PLAN	
Location: LIVERPOOL HOSPITAL ELIZABETH STREET, LIVERPOOL, NSW	
Report No: E32465BDrpt6-RAP	Figure No: 2
JK ENVIRONMENTS	

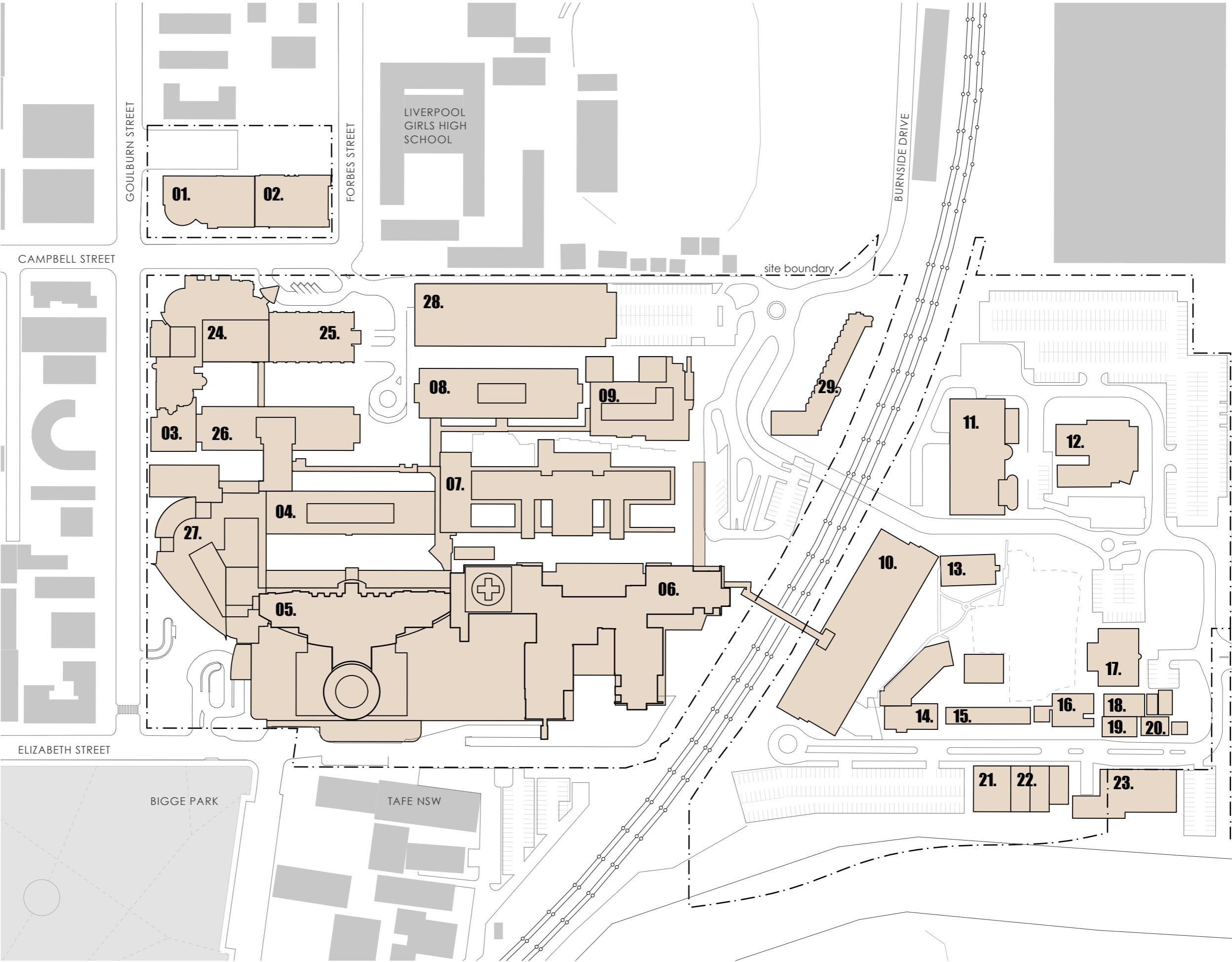


Appendix B: Selected Development Plans

LEGEND

- 01. health services building
- 02. ingham building
- 03. oncology bunkers
- 04. caroline chisholm
- 05. old clinical services building
- 06. new clinical services bld
- 07. mental health centre
- 08. don everett building
- 09. brain injury unit
- 10. P4 multi-storey car park
- 11. central energy building
- 12. ngara health education
- 13. bungala building
- 14. child care centre
- 15. staff education training
- 16. physical recources
- 17. admin building
- 18. multicultural health services
- 19. biu admin
- 20. biu nursing area
- 21. interpret building
- 22. store shed
- 23. isd swsahs
- 24. cancer building
- 25. pathology building
- 26. alex grimson
- 27. thomas & rachael moore edu. centre
- 28. P2 car park
- 29. ron dunbier

- liverpool campus
- existing buildings



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AMENDMENTS		
REV.	DATE	DESCRIPTION
02	10/01/20	FOR REVIEW
03	15/01/20	FOR REVIEW
04	17/01/20	FOR REVIEW
05	31/01/20	FOR REVIEW

CHK	PROJECT
RP	LIVERPOOL HEALTH & ACADEMIC PRECINCT
RP	ELIZABETH STREET LIVERPOOL NSW
RP	CLIENT
RP	HEALTH INFRASTRUCTURE
RP	14/77 PACIFIC HWY, NORTH SYDNEY NSW 2060

PROJECT NORTH	SCALE
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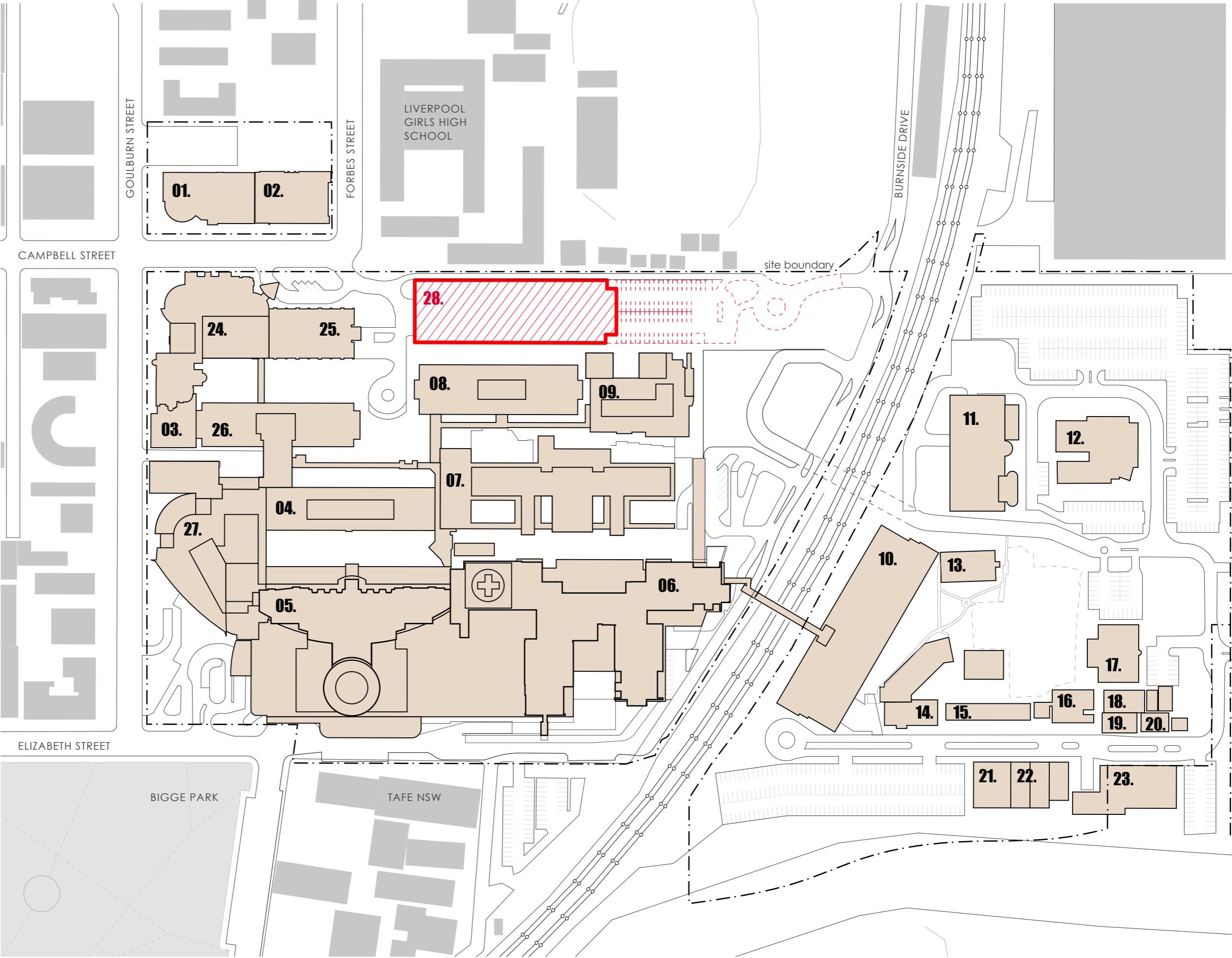
DRAWING	PRINT DATE
EXISTING SITE PLAN	31/01/2020

PROJECT NO.	DRAWING NO.	ISSUE
21807	A-SSDA-MSCP-03	05
STATUS		
DRAFT FOR REVIEW		

LEGEND

- 01. health services building
- 02. ingham building
- 03. oncology bunkers
- 04. caroline chisholm
- 05. old clinical services building
- 06. new clinical services bld
- 07. mental health centre
- 08. don everett building
- 09. brain injury unit
- 10. P4 multi-storey car park
- 11. central energy building
- 12. ngara health education
- 13. bungala building
- 14. child care centre
- 15. staff education training
- 16. physical resources
- 17. admin building
- 18. multicultural health services
- 19. biu admin
- 20. biu nursing area
- 21. interpret building
- 22. store shed
- 23. isd swsahs
- 24. cancer building
- 25. pathology building
- 26. alex grimson
- 27. thomas & rachael moore edu. centre
- *28. P2 car park

- road demo works
- ▨ buildings to be demolished
- ▭ liverpool campus
- existing buildings



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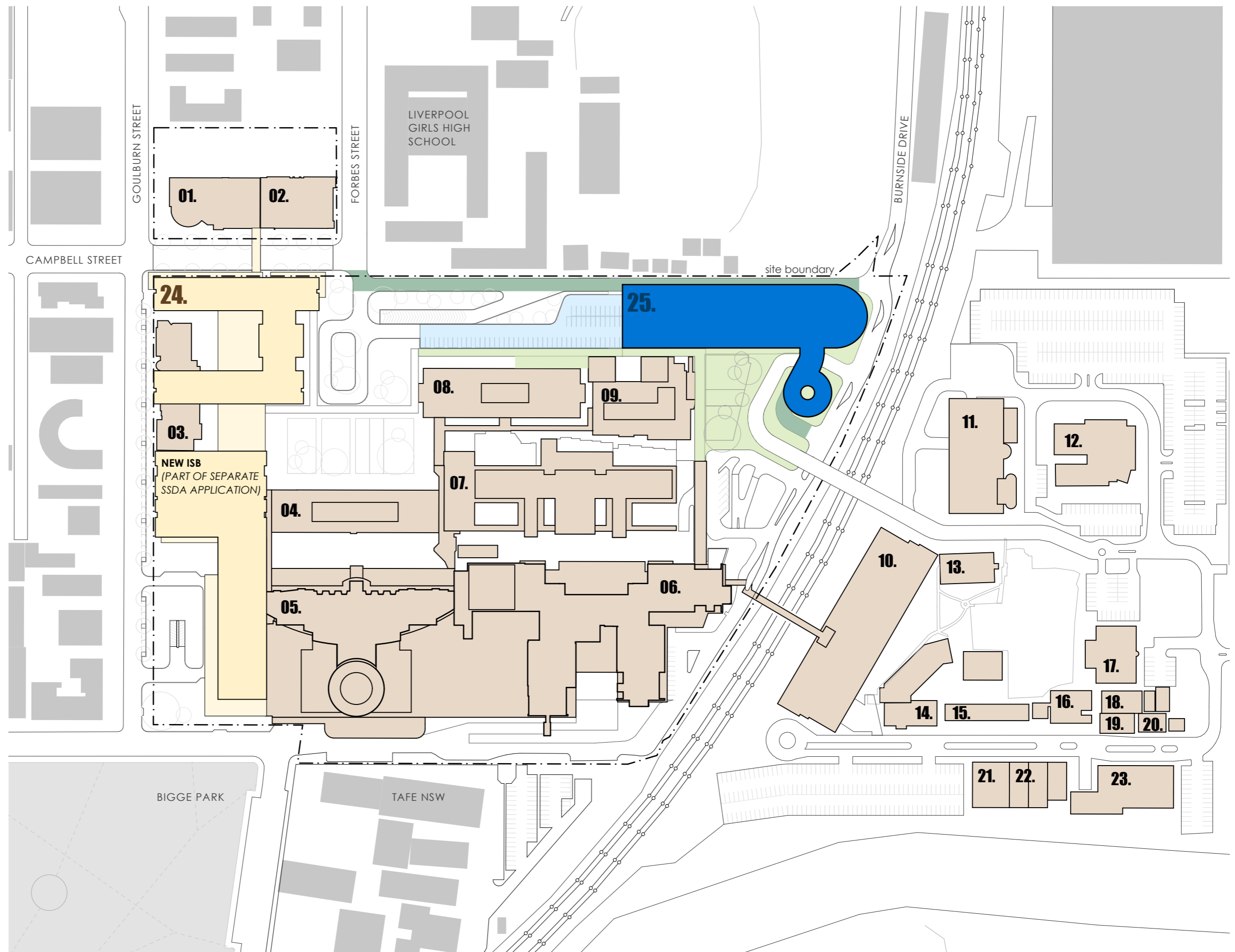
AMENDMENTS	REV.	DATE	DESCRIPTION
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03	15/01/20	FOR REVIEW	
04	17/01/20	FOR REVIEW	
05	31/01/20	FOR REVIEW	

CHK	PROJECT
RP	LIVERPOOL HEALTH & ACADEMIC PRECINCT
RP	ELIZABETH STREET LIVERPOOL NSW
RP	CLIENT
RP	HEALTH INFRASTRUCTURE
RP	14/77 PACIFIC HWY, NORTH SYDNEY NSW 2060

PROJECT NORTH	SCALE
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25mm ON ORIGINAL	

DRAWING	PROJECT NO.	DRAWING NO.	ISSUE
DEMOLITION PLAN	21807	A-SSDA-MSCP-04	05
PRINT DATE	STATUS		
31/01/2020	DRAFT FOR REVIEW		

01. health services building
02. ingham building
03. oncology bunkers
04. caroline chisholm
05. old clinical services building
06. new clinical services bld
07. mental health centre
08. don everett building
09. brain injury unit
10. P4 multi-storey car park
11. central energy building
12. ngara health education
13. bungala building
14. child care centre
15. staff education training
16. physical resources
17. admin building
18. multicultural health services
19. biu admin
20. biu nursing area
21. interpret building
22. store shed
23. isd swsahs
24. new integrated services building (ISB) (seperate SSDA)
25. new multi storey car park



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AMENDMENTS		
REV.	DATE	DESCRIPTION
02	10/01/20	FOR REVIEW
03	15/01/20	FOR REVIEW
04	17/01/20	FOR REVIEW
05	31/01/20	FOR REVIEW

CHK
RP
RP
RP
RP

PROJECT
LIVERPOOL HEALTH & ACADEMIC PRECINCT
ELIZABETH STREET LIVERPOOL NSW

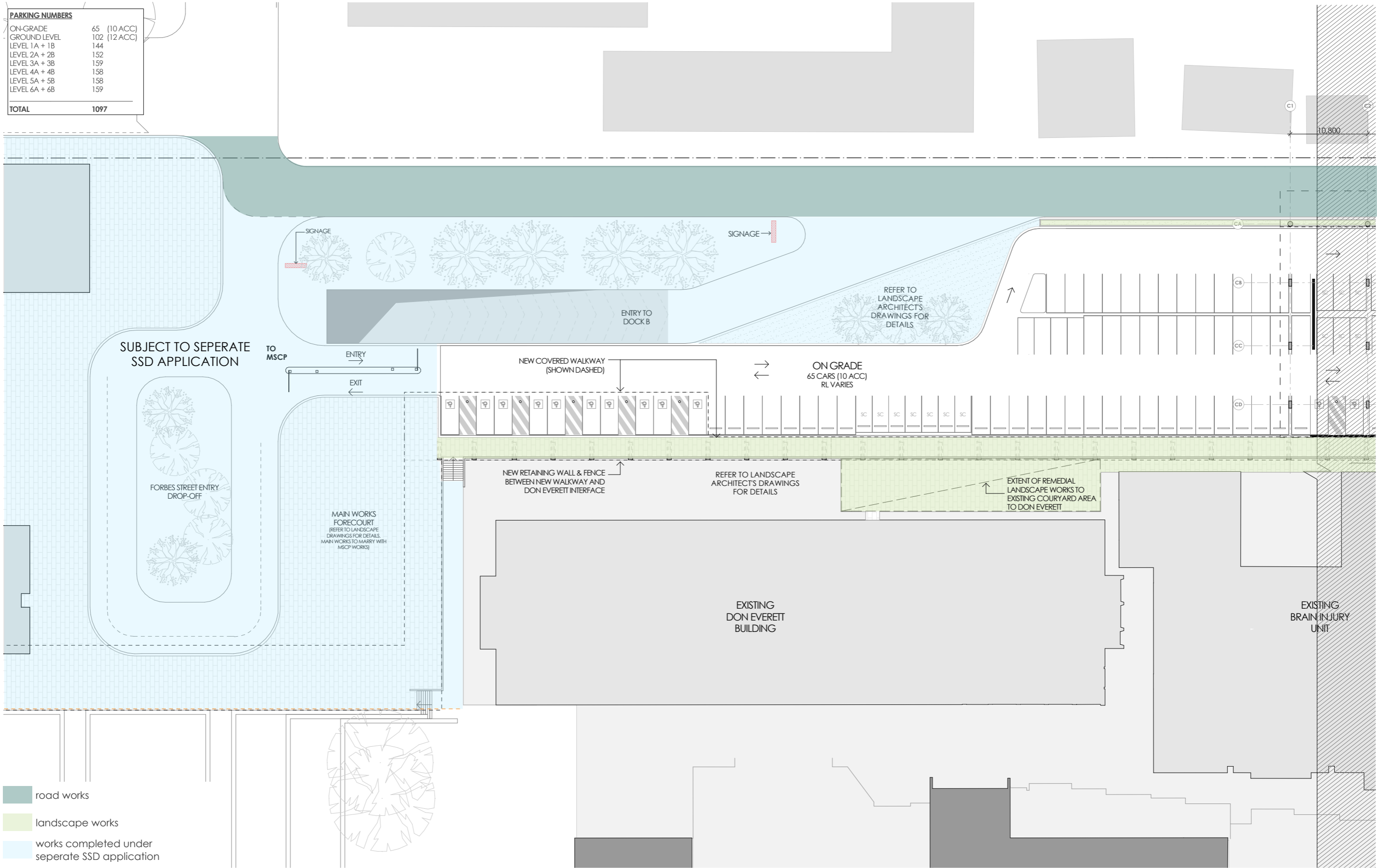
CLIENT
HEALTH INFRASTRUCTURE
14/77 PACIFIC HWY, NORTH SYDNEY NSW 2060

PROJECT NORTH SCALE
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DRAWING
SITE PLAN

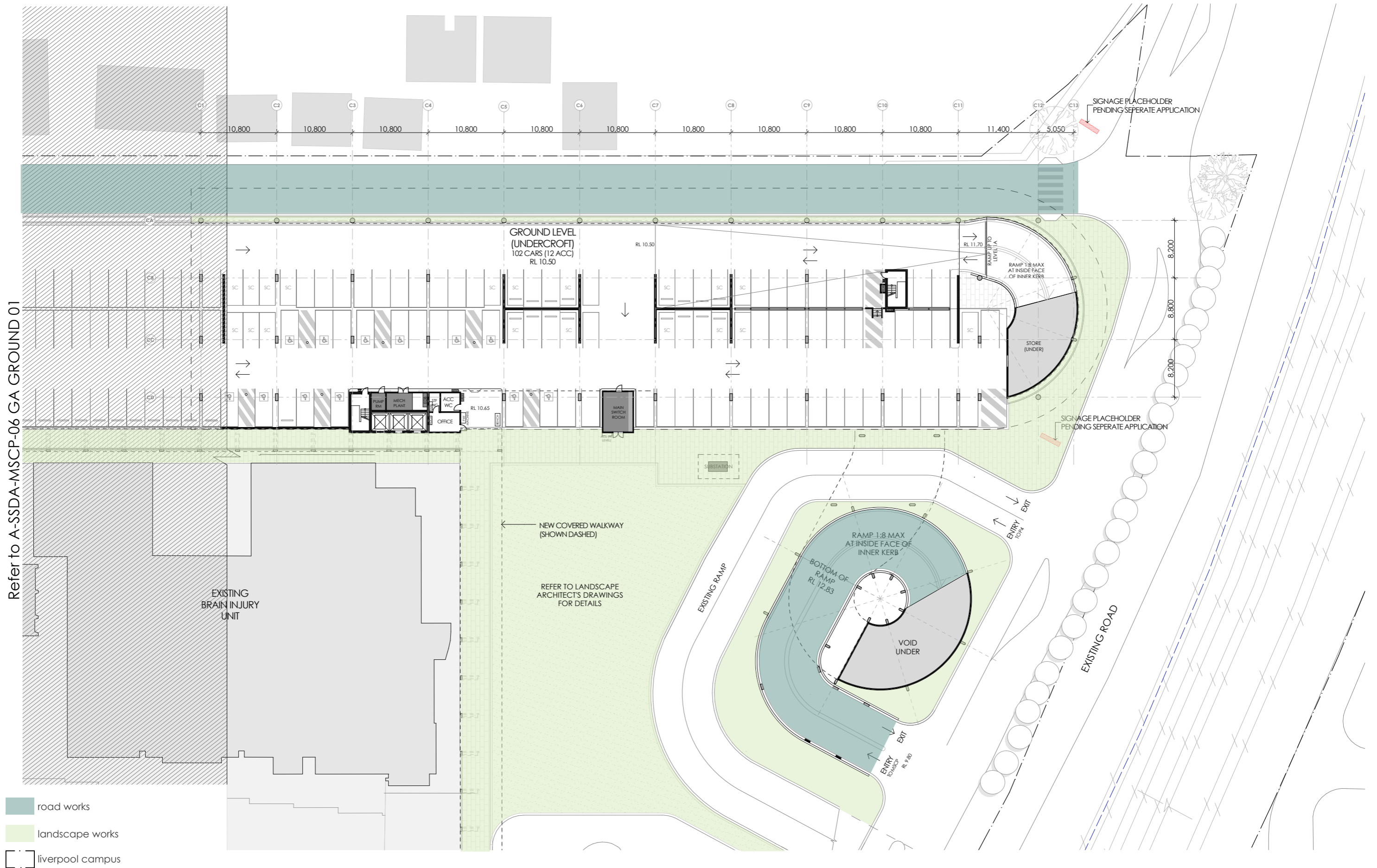
PRINT DATE
31/01/2020

PROJECT NO. 21807	DRAWING NO. A-SSDA-MSCP-05	ISSUE 05
STATUS DRAFT FOR REVIEW		



Refer to A-SSDA-MSCP-07 GA GROUND 01

Refer to A-SSDA-MSCP-06 GA GROUND 01



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REV.	DATE	DESCRIPTION
02	10/01/20	FOR REVIEW
03	15/01/20	FOR REVIEW
04	17/01/20	FOR REVIEW
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FOR REVIEW

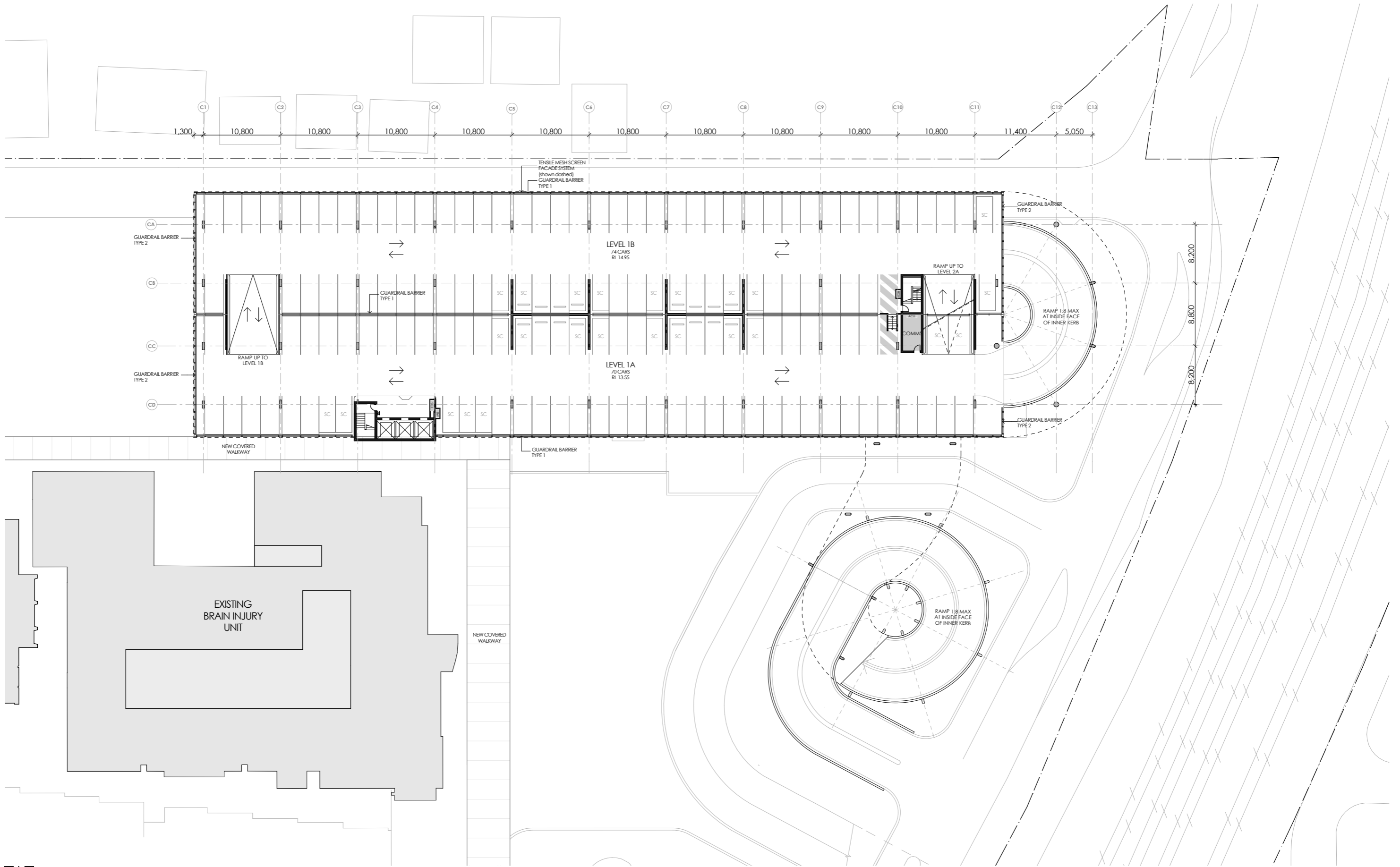
CHK
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PROJECT
LIVERPOOL HEALTH & ACADEMIC PRECINCT
ELIZABETH STREET LIVERPOOL NSW
CLIENT
HEALTH INFRASTRUCTURE
14/77 PACIFIC HWY, NORTH SYDNEY NSW 2060

PROJECT NORTH SCALE
1:500 @A3
25mm ON ORIGINAL

DRAWING
GA GROUND 02 (ROAD LAYOUT)
PRINT DATE
31/01/2020

PROJECT NO.
21807
DRAWING NO.
A-SSDA-MSCP-07
ISSUE
05
STATUS
DRAFT FOR REVIEW



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REV.	DATE	DESCRIPTION
02	10/01/20	FOR REVIEW
03	15/01/20	FOR REVIEW
04	17/01/20	FOR REVIEW
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FOR REVIEW
FOR REVIEW
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FOR REVIEW

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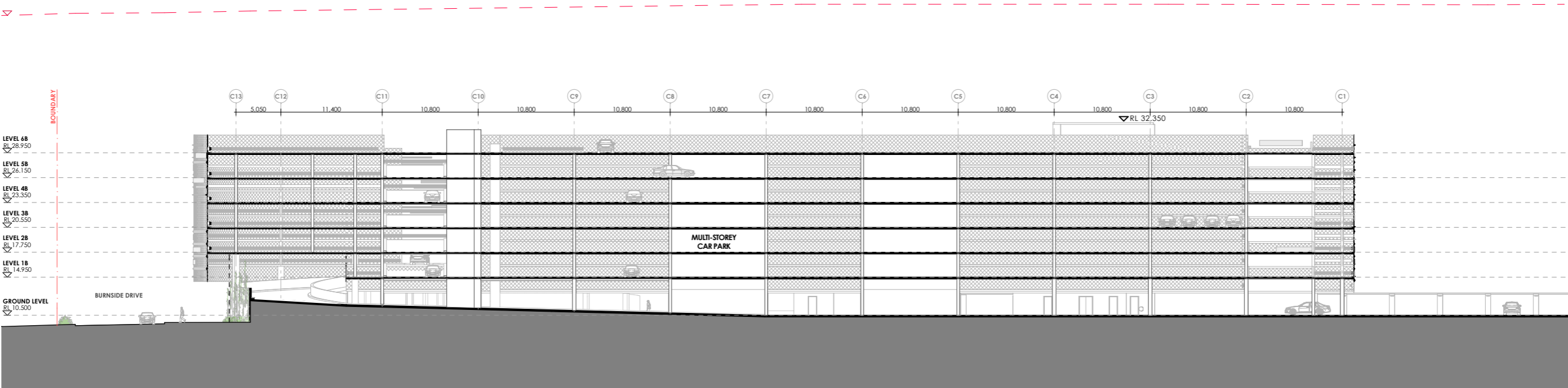
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LIVERPOOL HEALTH & ACADEMIC PRECINCT
ELIZABETH STREET LIVERPOOL NSW
CLIENT
HEALTH INFRASTRUCTURE
14/77 PACIFIC HWY, NORTH SYDNEY NSW 2060

PROJECT NORTH SCALE
1:500 @A3
25mm ON ORIGINAL

DRAWING
GA LEVEL 01
PRINT DATE
31/01/2020

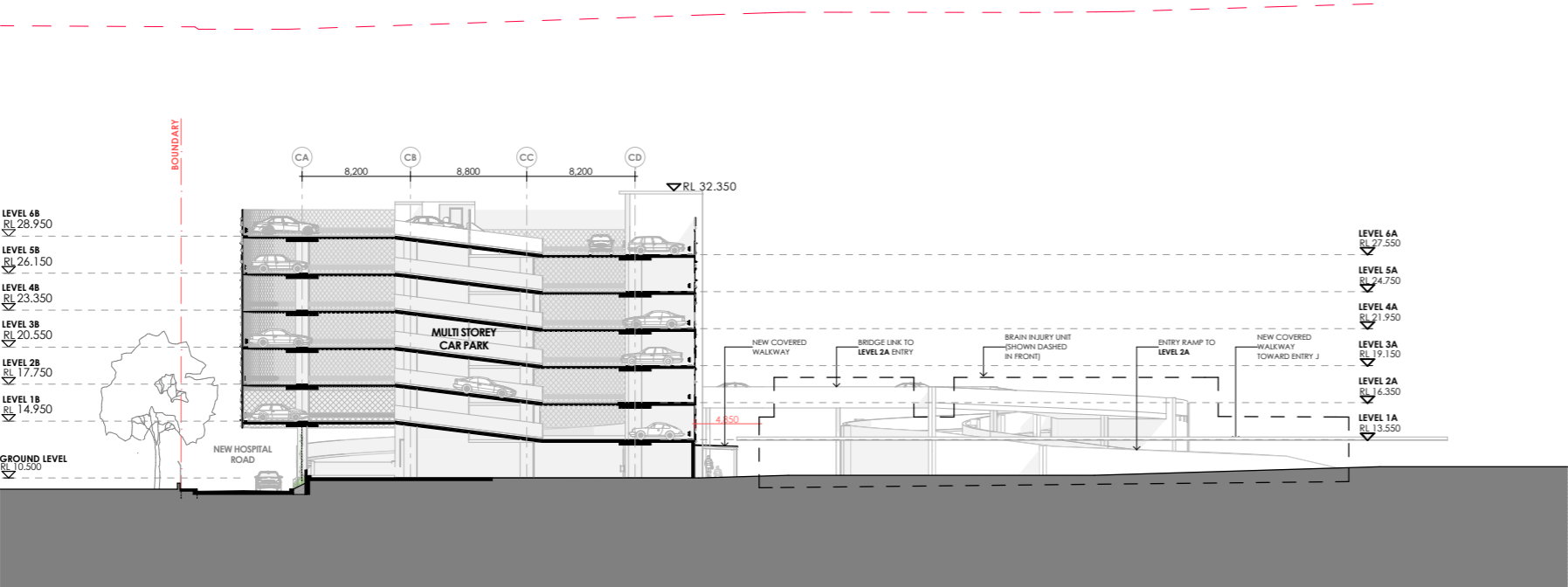
PROJECT NO. 21807	DRAWING NO. A-SSDA-MSCP-08	ISSUE 05
STATUS DRAFT FOR REVIEW		

LEP HEIGHT CONTROL
35m ABOVE GROUND

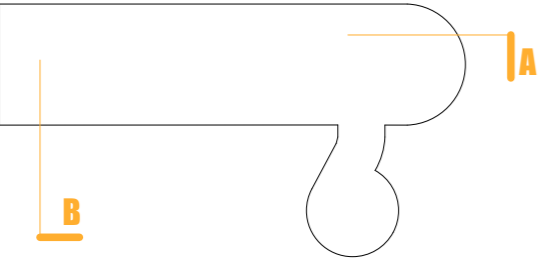


SECTION A

LEP HEIGHT CONTROL
35m ABOVE GROUND



SECTION B



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REV.	DATE	DESCRIPTION
02	10/01/20	FOR REVIEW
03	15/01/20	FOR REVIEW
04	17/01/20	FOR REVIEW
05	31/01/20	FOR REVIEW

DESCRIPTION
FOR REVIEW
FOR REVIEW
FOR REVIEW
FOR REVIEW

CHK
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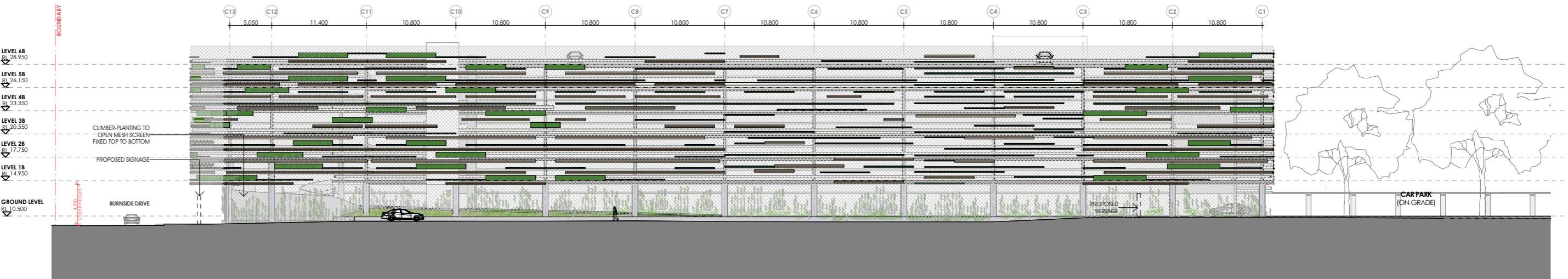
PROJECT
LIVERPOOL HEALTH & ACADEMIC PRECINCT
ELIZABETH STREET LIVERPOOL NSW
CLIENT
HEALTH INFRASTRUCTURE
14/77 PACIFIC HWY, NORTH SYDNEY NSW 2060

PROJECT NORTH SCALE
1:500 @A3
25mm ON ORIGINAL

DRAWING
SECTIONS
PRINT DATE
31/01/2020

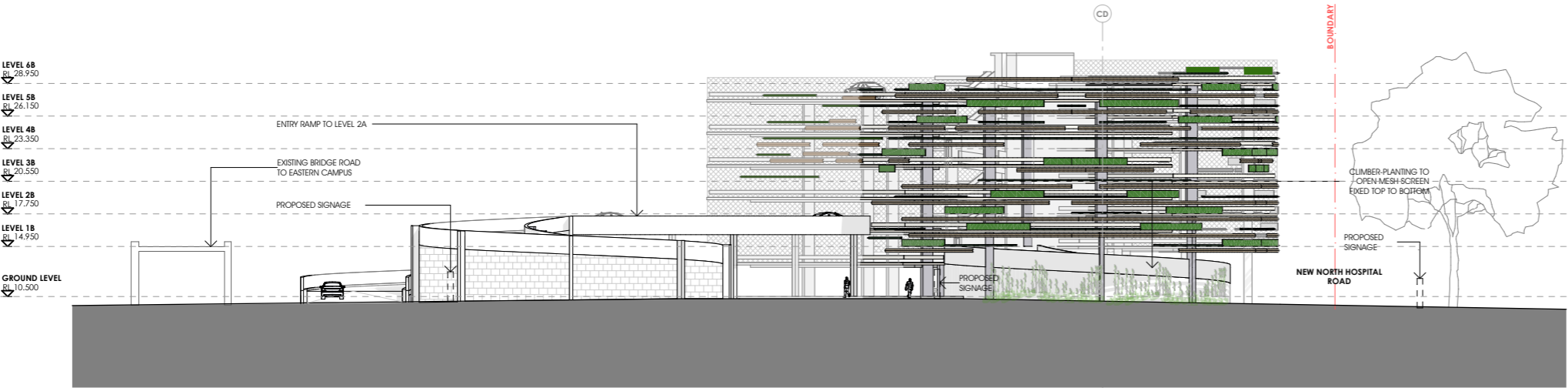
PROJECT NO.
21807
DRAWING NO.
A-SSDA-MSCP-14
ISSUE
05
STATUS
DRAFT FOR REVIEW

LEP HEIGHT CONTROL
35m ABOVE GROUND

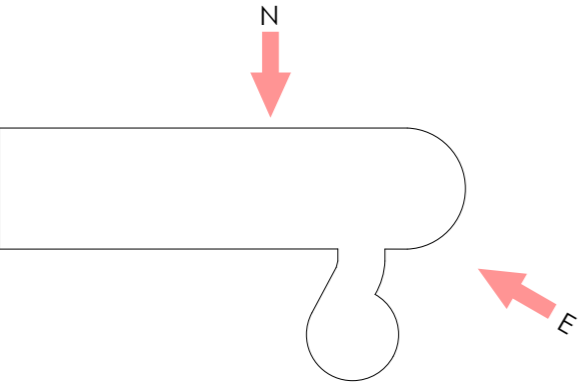


NORTH ELEVATION

LEP HEIGHT CONTROL
35m ABOVE GROUND



EAST ELEVATION



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REV.	DATE	DESCRIPTION
02	10/01/20	FOR REVIEW
03	15/01/20	FOR REVIEW
04	17/01/20	FOR REVIEW
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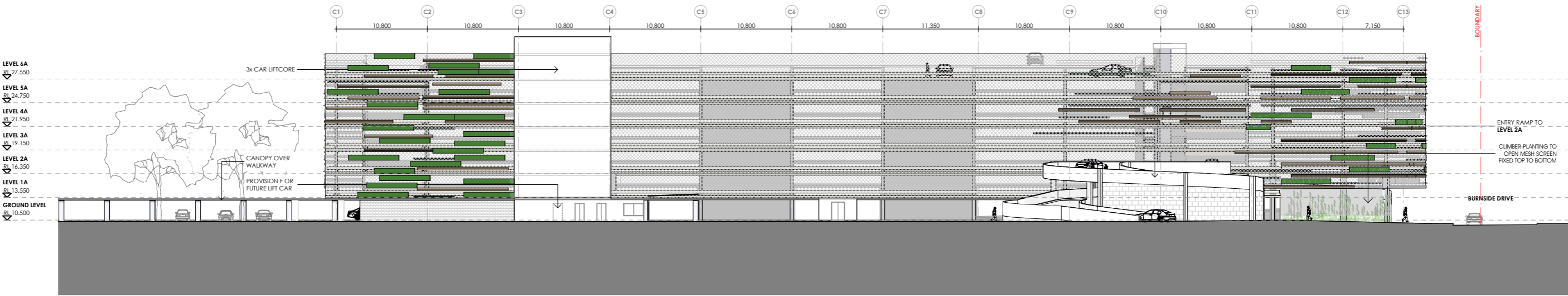
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LIVERPOOL HEALTH & ACADEMIC PRECINCT
ELIZABETH STREET LIVERPOOL NSW
CLIENT
HEALTH INFRASTRUCTURE
14/77 PACIFIC HWY, NORTH SYDNEY NSW 2060

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DRAWING
ELEVATIONS
PRINT DATE
31/01/2020

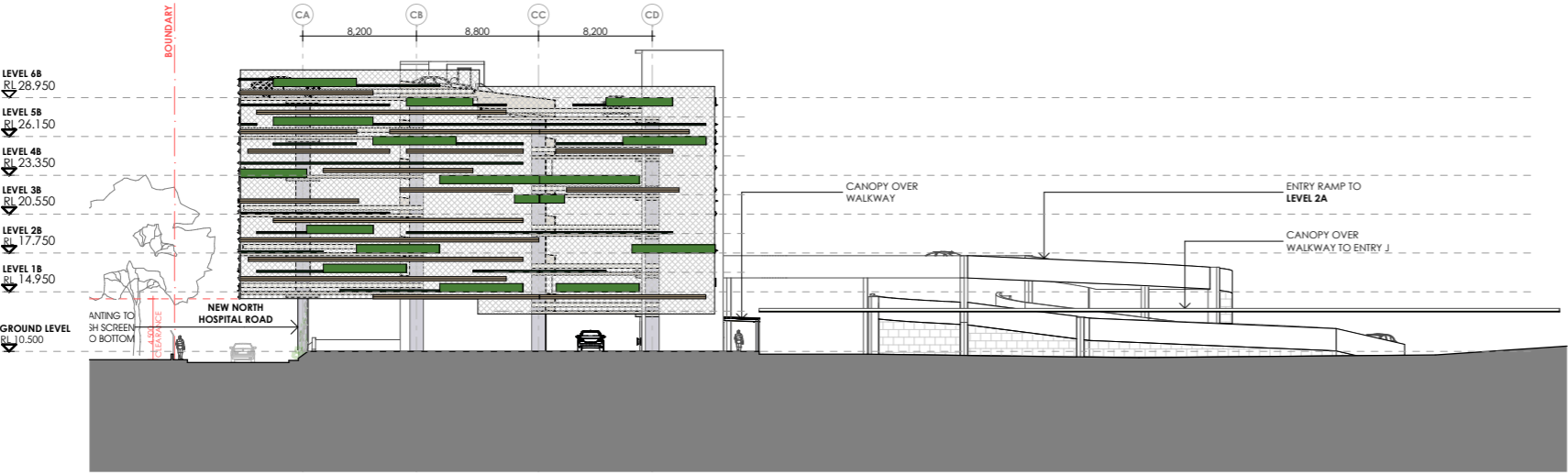
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21807
DRAWING NO.
A-SSDA-MSCP-15
ISSUE
05
STATUS
DRAFT FOR REVIEW

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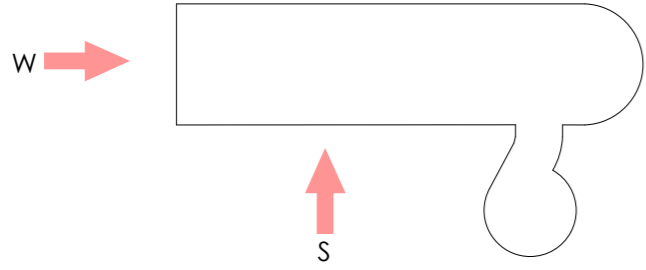


SOUTH ELEVATION

LEP HEIGHT CONTROL
35m ABOVE GROUND



WEST ELEVATION



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REV.	DATE	DESCRIPTION
02	10/01/20	FOR REVIEW
03	15/01/20	FOR REVIEW
04	17/01/20	FOR REVIEW
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FOR REVIEW
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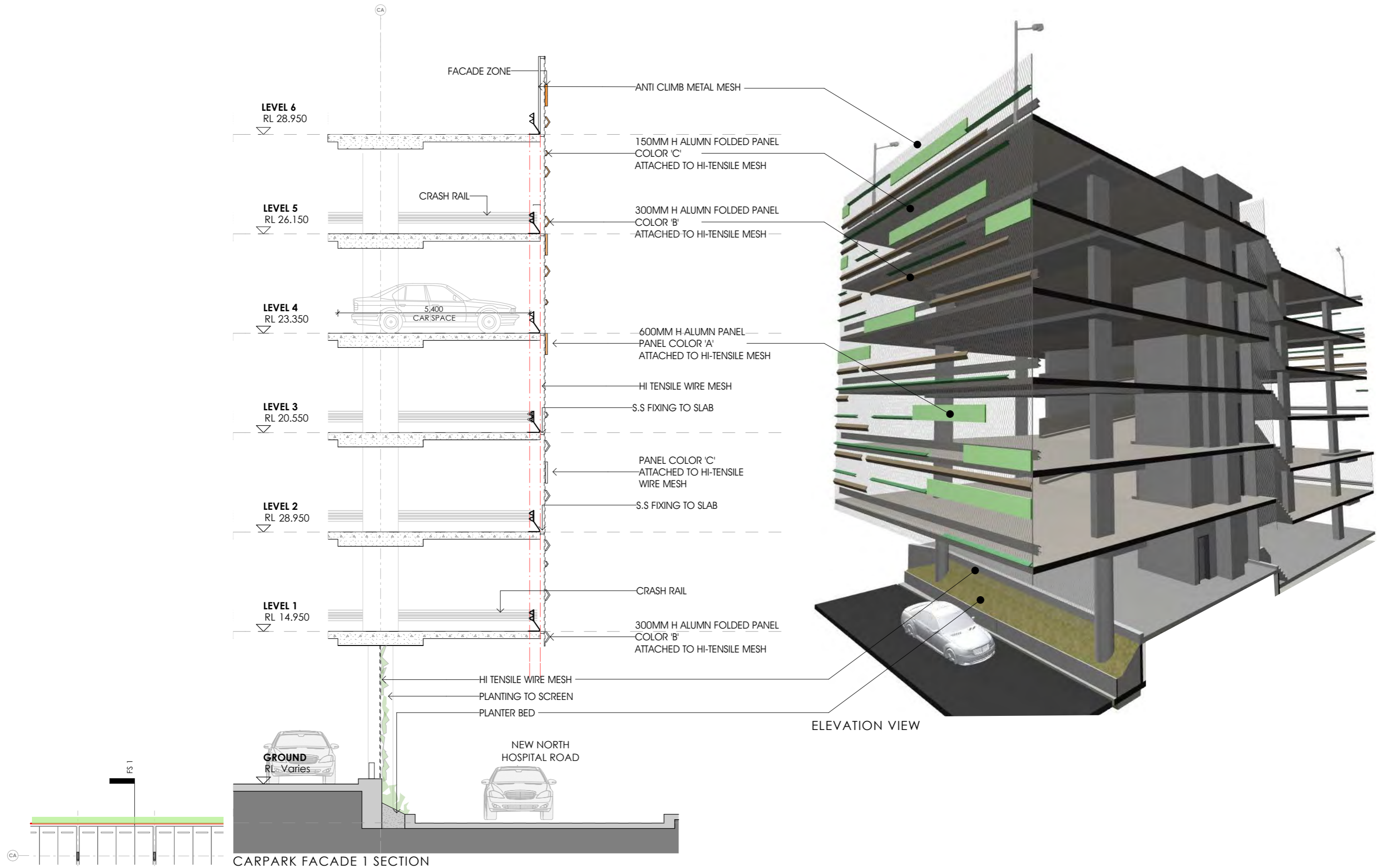
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PROJECT
LIVERPOOL HEALTH & ACADEMIC PRECINCT
ELIZABETH STREET LIVERPOOL NSW
CLIENT
HEALTH INFRASTRUCTURE
14/77 PACIFIC HWY, NORTH SYDNEY NSW 2060

PROJECT NORTH SCALE
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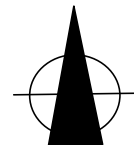
DRAWING
ELEVATIONS
PRINT DATE
31/01/2020

PROJECT NO.
21807
DRAWING NO.
A-SSDA-MSCP-16
ISSUE
05
STATUS
DRAFT FOR REVIEW





Appendix C: JKE Stage 2 ESA Contamination Figures



LEGEND:



APPROXIMATE SITE BOUNDARY
(STAGE 2 ESA INVESTIGATION AREA)



APPROXIMATE EXTENT OF MULTI
STOREY CARPARK DEVELOPMENT

Title:

SITE LOCATION PLAN

Location:

LIVERPOOL HOSPITAL
ELIZABETH STREET, LIVERPOOL, NSW

Report No:

E32465BDrpt5

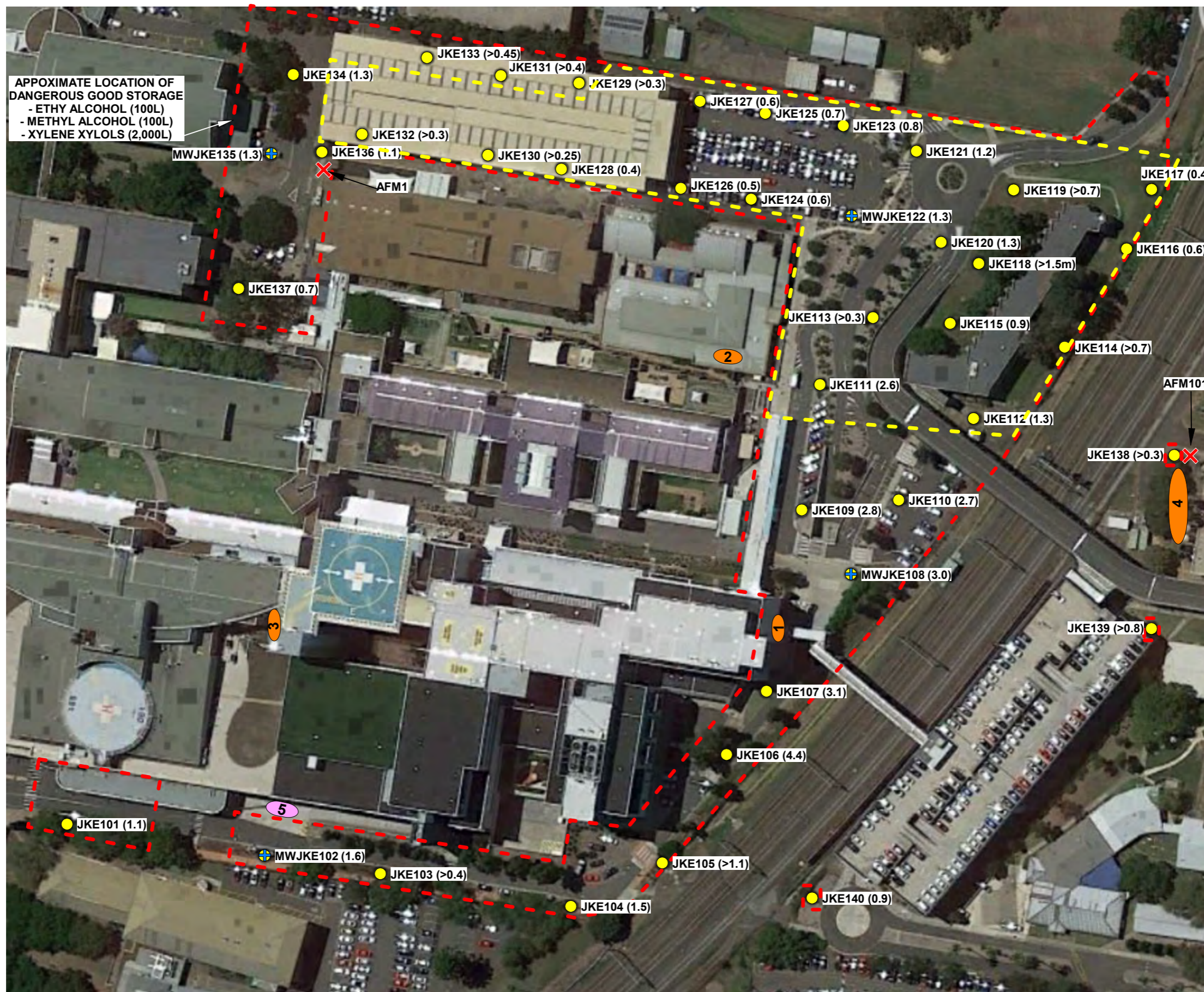
Figure No:

1

JK ENVIRONMENTS



Notes: Reference should be made to the report text for a full understanding of this plan. Image Sources: <https://maps.six.nsw.gov.au/> and wheris.com



LEGEND:

- APPROXIMATE SITE BOUNDARY
- APPROXIMATE EXTENT OF MULTI STOREY CARPARK DEVELOPMENT
- JKE (0.1) BOREHOLE LOCATION, NUMBER AND DEPTH OF FILL (m)
- ⊕ MWJKE (0.1) BOREHOLE AND GROUNDWATER MONITORING WELL LOCATION, NUMBER AND DEPTH OF FILL (m)

- ✗ AMF ASBESTOS SURFACE FRAGMENT LOCATION
- 1 APPROXIMATE LOCATION OF UNDERGROUND STORAGE TANK, REMOVED IN 2008
- 2 & 3 APPROXIMATE LOCATION OF UNDERGROUND STORAGE TANK, STATUS UNKNOWN
- 4 APPROXIMATE LOCATION OF EXISTING UNDERGROUND STORAGE TANK

- 5 APPROXIMATE LOCATION OF EXISTING ABOVEGROUND STORAGE TANKS, WITHIN A BASEMENT

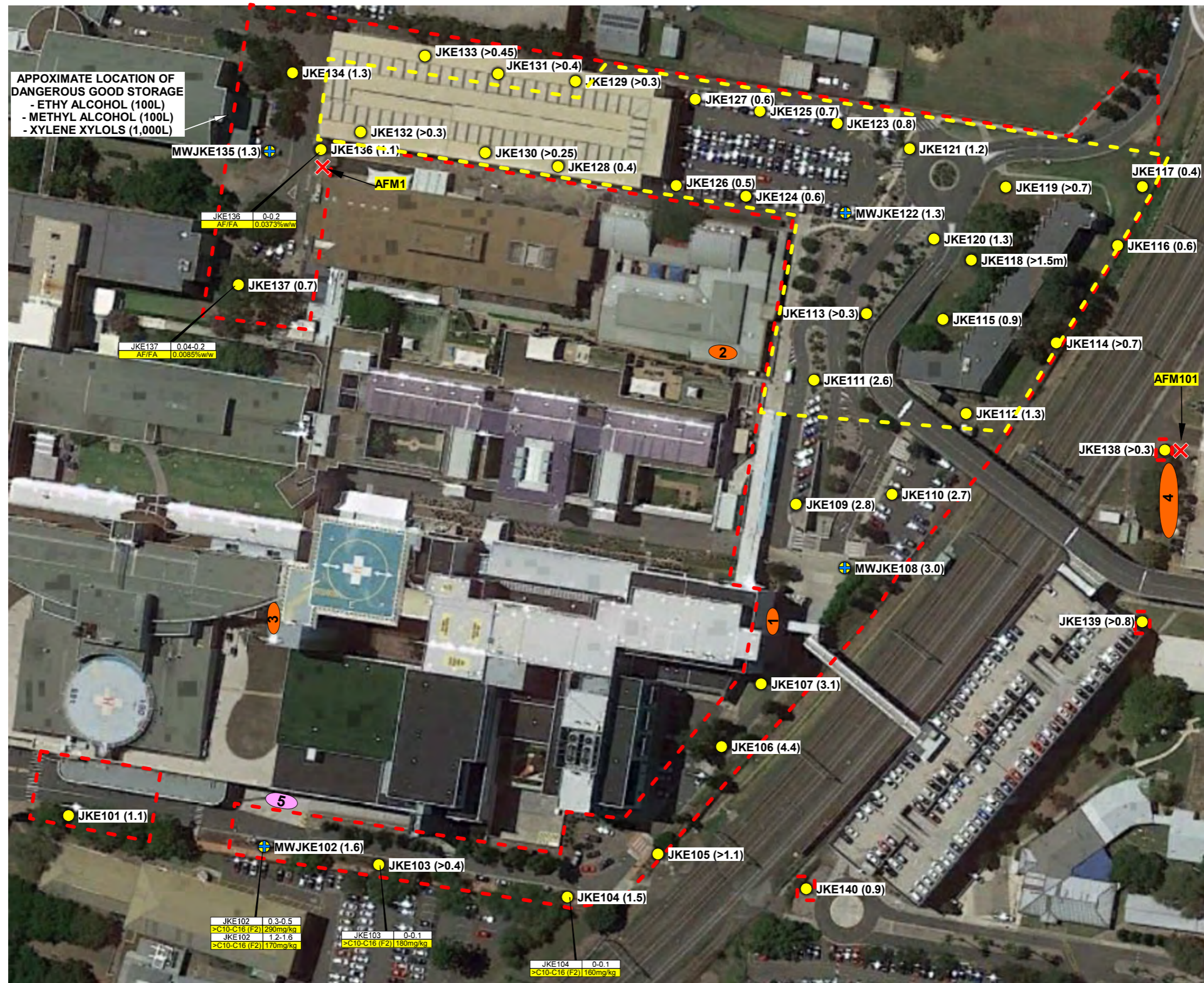
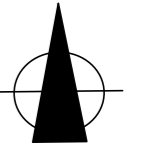
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Notes: Reference should be made to the report text for a full understanding of this plan.

Image Source: Google Earth

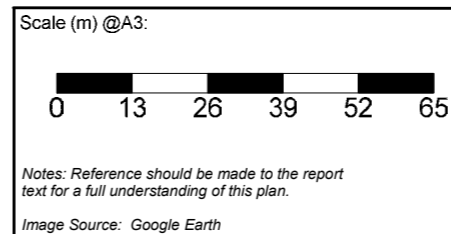
Title: SAMPLING LOCATION PLAN	
Location: LIVERPOOL HOSPITAL ELIZABETH STREET, LIVERPOOL, NSW	
Report No: E32465BDrpt5	Figure No: 2
JK ENVIRONMENTS	





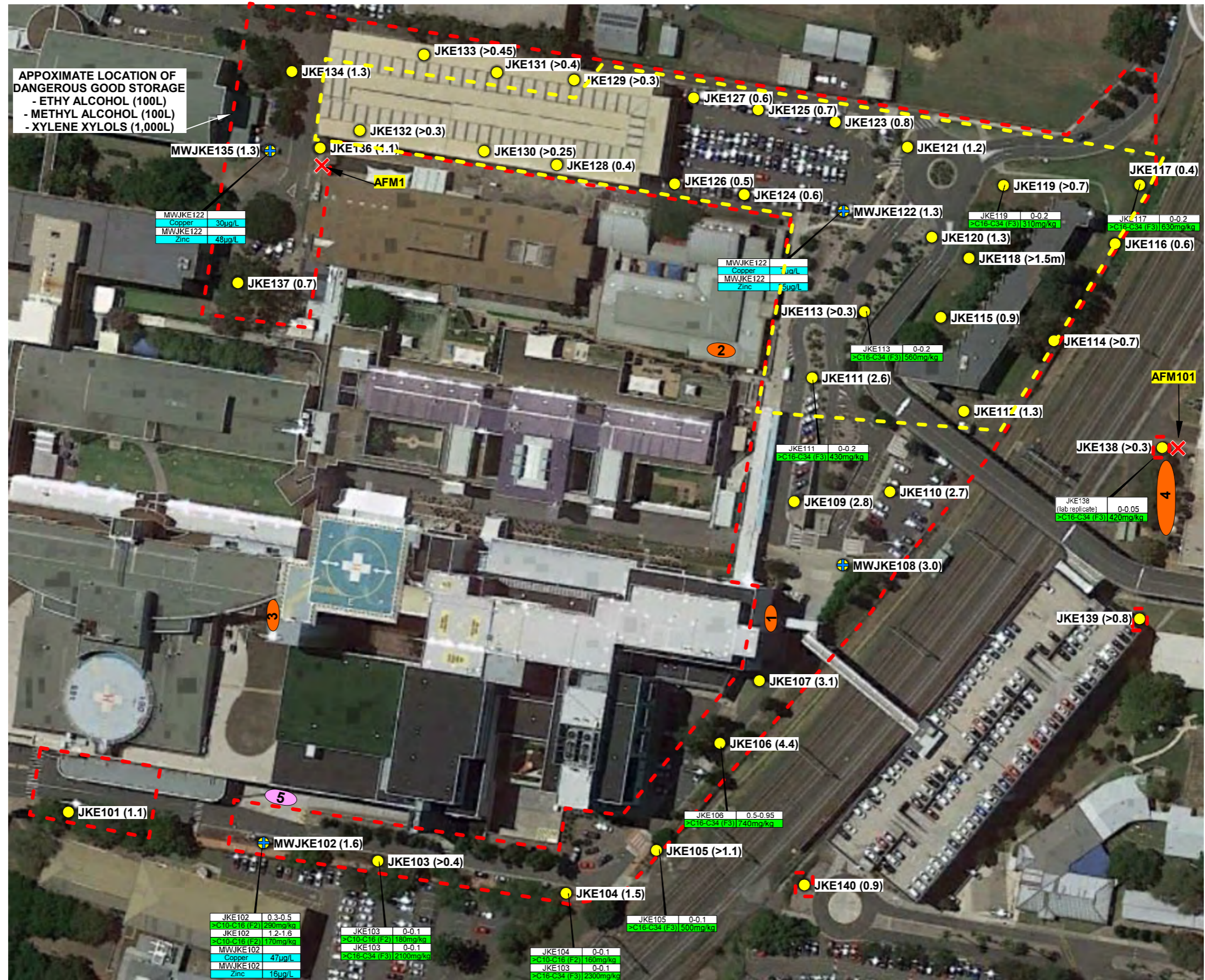
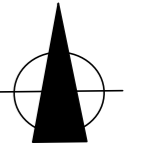
LEGEND:

- APPROXIMATE SITE BOUNDARY
- APPROXIMATE EXTENT OF MULTI STOREY CARPARK DEVELOPMENT
- JKE (0.1) BOREHOLE LOCATION, NUMBER AND DEPTH OF FILL (m)
- MWJKE (0.1) BOREHOLE AND GROUNDWATER MONITORING WELL LOCATION, NUMBER AND DEPTH OF FILL (m)
- AMF ASBESTOS SURFACE FRAGMENT LOCATION
- 1 APPROXIMATE LOCATION OF UNDERGROUND STORAGE TANK, REMOVED IN 2008
- 2 & 3 APPROXIMATE LOCATION OF UNDERGROUND STORAGE TANK, STATUS UNKNOWN
- 4 APPROXIMATE LOCATION OF EXISTING UNDERGROUND STORAGE TANK
- 5 APPROXIMATE LOCATION OF EXISTING ABOVEGROUND STORAGE TANKS, WITHIN A BASEMENT
- SOIL CONTAMINATION ABOVE SAC FOR HUMAN HEALTH RISK (%W/W or mg/kg)



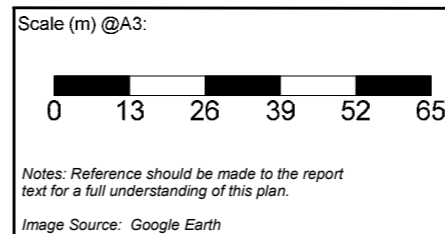
Title: CONTAMINATION DATA PLAN - HUMAN HEALTH	
Location: LIVERPOOL HOSPITAL ELIZABETH STREET, LIVERPOOL, NSW	
Report No: E32465BDrpt5	Figure No: 3
JK ENVIRONMENTS	





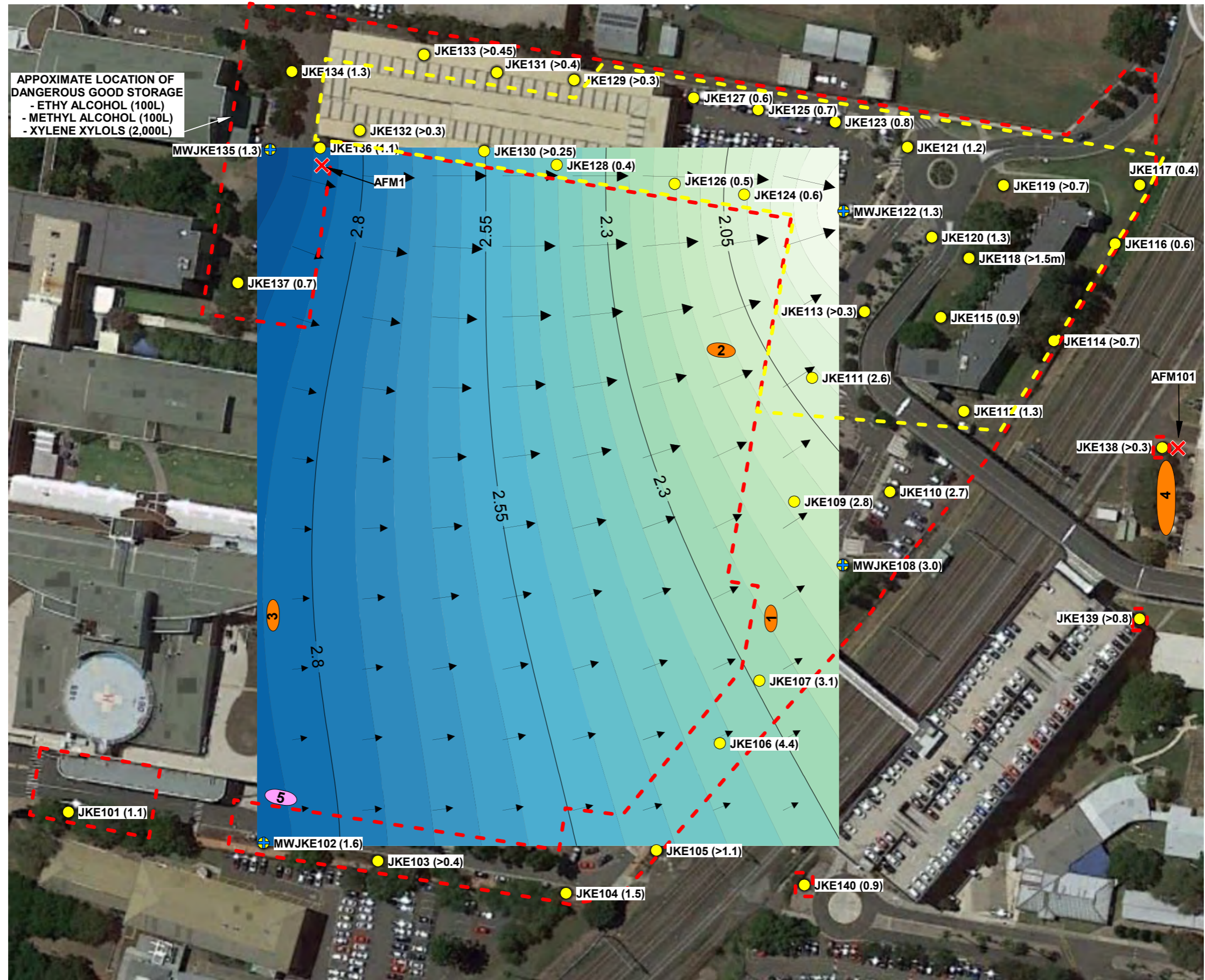
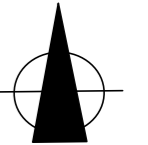
LEGEND:

- APPROXIMATE SITE BOUNDARY
- APPROXIMATE EXTENT OF MULTI-STOREY CARPARK DEVELOPMENT
- JKE (0.1) BOREHOLE LOCATION, NUMBER AND DEPTH OF FILL (m)
- MWJKE (0.1) BOREHOLE AND GROUNDWATER MONITORING WELL LOCATION, NUMBER AND DEPTH OF FILL (m)
- ✗ AMF ASBESTOS SURFACE FRAGMENT LOCATION
- 1 APPROXIMATE LOCATION OF UNDERGROUND STORAGE TANK, REMOVED IN 2008
- 2 & 3 APPROXIMATE LOCATION OF UNDERGROUND STORAGE TANK, STATUS UNKNOWN
- 4 APPROXIMATE LOCATION OF EXISTING UNDERGROUND STORAGE TANK
- 5 APPROXIMATE LOCATION OF EXISTING ABOVEGROUND STORAGE TANKS, WITHIN A BASEMENT
- SOIL CONTAMINATION ABOVE SAC FOR ECOLOGICAL RISK (mg/kg)
- GROUNDWATER CONTAMINATION ABOVE SAC FOR ECOLOGICAL RISK (µg/L)



Title: CONTAMINATION DATA PLAN - ECOLOGICAL	
Location: LIVERPOOL HOSPITAL ELIZABETH STREET, LIVERPOOL, NSW	
Report No: E32465BDrpt5	Figure No: 4
JK ENVIRONMENTS	







Appendix D: Waste Tracking Spreadsheet

Offsite Disposal

[illegible]

¹ After NSW EPA Waste Classification Guidelines/ The excavated natural material order 2014 / Meets POEO VENM Definition / other

² If material was excavated and stockpiled post classification

³ Samples must include those collected specifically for waste classification purposes and samples collected from the source area for purposes other than waste classification

⁴ Keep Units Consistent

^b If volume on docket is different to volume on Waste Classification Letter

⁶ If one is available

⁷ If undertaken

[illegible]

Appendix E: Guidelines and Reference Documents

Contaminated Land Management Act 1997 (NSW)

Managing Land Contamination, Planning Guidelines SEPP55 – Remediation of Land (1998)

NSW EPA, (1995). Contaminated Sites Sampling Design Guidelines

NSW EPA, (2014). Waste Classification Guidelines - Part 1: Classifying Waste

NSW EPA, (2015). Guidelines on the Duty to Report Contamination under Section 60 of the CLM Act 1997

NSW EPA, (2017). Guidelines for the NSW Site Auditor Scheme, 3rd Edition

NSW EPA (2020). Guidelines for Consultants Reporting on Contaminated Sites.

NSW SafeWork, (2019). Code of Practice: How to Safely Remove Asbestos.

NSW SafeWork, (2019). Code of Practice: How to Manage and Control Asbestos in the Workplace.

National Environment Protection Council (NEPC), (2013). National Environmental Protection (Assessment of Site Contamination) Measure 1999 as amended (2013)

Protection of the Environment Operations Act 1997 (NSW)

Protection of the Environment Operations (Waste) Regulation 2014 (NSW)

State Environmental Planning Policy No.55 – Remediation of Land 1998 (NSW)