

27 March 2015 Our Ref: AS121111B

Lend Lease (Millers Point) Pty Ltd Attn: Mark Burns 30 The Bond 30 Hickson Road Millers Point NSW 2000

By email: Mark.Burns @lendlease.com

Dear Mark

Re: Barangaroo, Block 5 Remediation DA (SSD 6533), Off-site Treatment of Waste

As a NSW-EPA accredited Contaminated Sites Auditor, I am conducting a contamination audit in relation to the southern portion of the site known as "Barangaroo", at Millers Point, NSW on behalf of Lend Lease (Millers Point) Pty Ltd (Lend Lease).

I previously prepared a Site Audit Report and accompanying Site Audit Statement GN447A dated 31 July 2013 regarding the Remediation Action Plan (RAP, by AECOM Australia Pty Ltd (AECOM), dated 24 July 2013) relating to revocation of the EPA declaration from EPA declaration site number 21122. An Environmental Impact Statement (EIS, by JBA Urban Planning Consultants Pty Ltd, dated 2014) was subsequently submitted to support a State Significant Development application for Remediation of Block 5 (SSD 6533), located within the declaration site. The EIS referred to the RAP.

The NSW Environment Protection Authority (EPA, letter dated 20 November 2014) reviewed the EIS and made the comment that the proposed remediation method ("Off-site ex-situ treatment") was not consistent with the proposed remediation method discussed in the RAP. The EPA considered that the RAP proposed on-site treatment prior to disposal at a licensed landfill while the EIS proposed treatment at an off-site treatment facility prior to disposal at a licensed landfill. AECOM conducted a review of the EPA's comments and the RAP and prepared the following letter that I have been provided for review:

 "Barangaroo, Block 5 Remediation DA (SSD 6533), Preliminary Methodology for Off-site Transport and Treatment of Hazardous Waste, Hickson Road, Millers Point" dated 4 March 2015, by AECOM.

AECOM identified sections in the RAP where the potential for excavated material to be transported off-site for treatment prior to disposal is contemplated (Sections 13.3 and 14.1) and concluded that "the proposed ex-situ remediation approach including off-site treatment of materials from Block 5 is consistent with the VMP/ Block 4 RAP…".

I note that the RAP does not explicitly list off-site treatment when discussing the preferred remediation option for Block 5 (Section 11.3) or the Remediation Works Overview for Block 5 (Section 12.3.3). However, the later general sections of the RAP (including the referenced Sections 13.3 and 14.1) do consider the potential for off-site treatment, therefore the proposed off-site treatment of material prior to disposal to a licensed landfill is consistent with the remediation approach described in the RAP. However, as noted by the EPA, if using off-site treatment as the primary means of waste management, this will require careful management to ensure the controls specified in the RAP are implemented. While not the most preferred option, off-site treatment is consistent with EPA guidelines if managed appropriately.

I note that the EPA also made comment on odour control procedures. These were discussed in the AECOM letter (4 March 2015) and further details are to be provided in an Air Quality and Odour Management Sub-Plan which is not the subject of Site Auditor review.

Yours faithfully

ENVIRON Australia Pty Ltd

Graeme Nyland

Accredited Auditor 9808