

24 January 2019

Health Infrastructure
c/- Sue Folliott
TSA Management
Via email: sfolliott@tsamanagement.com.au

Interim Audit Advice (0503-1901-1): Proposed Tweed Valley Hospital, 771 Cudgen Road, Cudgen NSW – Audit Status Update

Dear Sue,

1. Introduction

Andrew Lau, of JBS&G Australia Pty Ltd (JBS&G), has been engaged by TSA Management (TSA) on behalf of Health Infrastructure (HI, the Client) to conduct a site audit at the property located at 771 Cudgen Road, Cudgen, NSW, 2487 (the site). The site is legally identified as Lot 11 in DP 1246853. The site audit relates to the proposed development of the site as the Tweed Valley Hospital.

Andrew Lau is a Site Auditor accredited by the NSW Environment Protection Authority (EPA) under the *Contaminated Land Management Act 1997* (CLM Act 1997) (Accreditation Number 0503).

2. Documents Reviewed

To date, the following documents have been reviewed as part of the site audit:

- *Soil Sampling Analysis and Quality Plan, 771 Cudgen Road, Cudgen, NSW, Version 2.0, OCTIEF Pty Ltd, 10 August 2018 (OCTIEF 2018a).*
- *Preliminary and Detailed Site Investigation – 771 Cudgen Road, Cudgen, NSW 2487, OCTIEF Pty Ltd, 17 October 2018 (OCTIEF 2018b).*
- *Remediation Action Plan, Tweed Valley Hospital site, 771, Cudgen Road, Cudgen NSW, OCTIEF Pty Ltd, 28 November 2018 (OCTIEF 2018c).*
- *Asbestos Clearance Certificate 18084-CC04, 771 Cudgen Road, Cudgen NSW, Cavvanba Consulting Pty Ltd, December 2018 (Cavvanba 2018a).*
- *Soil Investigation Report – Residential House, 771 Cudgen Road, Cudgen NSW, Cavvanba Consulting Pty Ltd, 20 December 2018 (Cavvanba 2018b).*
- *Remedial Action Plan Addendum – Residential House, 771 Cudgen Road, Cudgen NSW, Cavvanba Consulting Pty Ltd, 8 January 2019 (Cavvanba 2019a).*
- *Soil Investigation Report – Farm Shed, 771 Cudgen Road, Cudgen NSW, Cavvanba Consulting Pty Ltd, 16 January 2019 (Cavvanba 2019b).*
- *Remedial Action Plan Addendum – Farm Shed, 771 Cudgen Road, Cudgen NSW, Cavvanba Consulting Pty Ltd, 16 January 2019 (Cavvanba 2019c).*

3. Audit Status

To date, the following audit functions have been completed at the site:

- 27 July 2018 – Commencement of the site audit (0503-1901).
- 31 July 2018 – Review of a draft Sampling Analysis and Quality Plan (SAQP), prepared by the consultant, OCTIEF. The auditor provided comments which were adequately addressed by the consultant, as documented in OCTIEF (2018a).
- 2 August 2018 – Site inspection undertaken by the site auditor assistant to confirm site layout and condition.
- 14 September 2018 – Review of a draft Preliminary and Detailed Site Investigation (PSI/DSI) Report, prepared by OCTIEF. The auditor provided a number of comments which were adequately addressed by the consultant, as documented in OCTIEF (2018b).
- 23 January 2019 – Review and comment on a draft remedial action plan (RAP) (OCTIEF 2018c), additional soil investigation reports (Cavvanba 2018b, Cavvanba 2019b) and RAP addenda (Cavvanba 2019a and Cavvanba 2019c).

Provided that responses/updated reports to satisfactorily address auditor comments issued on 23 January 2019 are received, it is anticipated that a Site Audit Statement (SAS) and accompanying Site Audit Report (SAR) will be issued by the auditor mid-February 2019.

Please note that this interim advice does not constitute a Site Audit Statement or a Site Audit Report, but is provided to assist in the assessment and management of contamination issues at the site in regard to requirements of the site audit. The information provided herein should not be considered pre-emptive of the final audit conclusions, but rather represent the findings of the audit based on a preliminary review of available site information. Furthermore, the interim advice should not be regarded as approval of any proposed investigations or remedial activities, as any such approval is beyond the scope of an independent auditor.

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email alau@jbsg.com.au.

Yours sincerely:



Andrew Lau
NSW EPA Accredited Site Auditor
JBS&G Australia Pty Ltd

Attachments (1) Limitations

Attachment 1 – Limitations

This audit was conducted with a reasonable level of scrutiny, care and diligence on behalf of the client for the purposes outlined in the *Contaminated Land Management Act 1997*. The data used to support the conclusions reached in this audit were obtained by other consultants and the limitations which apply to the consultant's report(s) apply equally to this audit report.

Every reasonable effort has been made to identify and obtain all relevant data, reports and other information that provide evidence about the condition of the site, and those that were held by the client and the client's consultants, or that were readily available. No liability can be accepted for unreported omissions, alterations or errors in the data collected and presented by other consultants. Accordingly, the data and information presented by others are taken and interpreted in good faith.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements. Limited sampling and laboratory analyses were undertaken as part of the investigations reviewed, as described herein. Ground conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this audit are based on the information obtained at the time of the investigations.