
TWEED VALLEY HOSPITAL – 771 CUDGEN ROAD

OCTIEF have undertaken a review of the Tweed Shire Council response letter dated 7 December 2018 (council reference DA18/0685 LN40120) in relation to the Tweed Valley project, and responses to the comments and recommendations in relation to the contaminated land investigation are presented below:

- i) The Historical Heritage Assessment (Niche, 2018) identified past land uses for the site and potentially contaminating activities in the vicinity of the farm dump that should be considered in the detailed site contamination investigation**

Historical land use noted by Niche is consistent with historical agricultural use of the site. The cane tram line easement on the property as noted in the Niche report is considered unlikely to be a source of contamination. Contaminants potentially associated with rail lines generally are consistent with contaminants of concern associated with agricultural land use. Testing for these contaminants was undertaken as part of the detailed site investigation by OCTIEF (including in the area of the former tram easement) and no elevated concentrations were detected.

Evidence of corroded tram line track and harvesting machinery was identified by Niche near the main farm dump. OCTIEF have liaised with Niche regarding the nature of the material identified and the identified items are inert scrap iron / steel waste and not considered potential sources of contamination.

- ii) Some areas in the vicinity of the farm dump were not accessible due to vegetation overgrowth. These areas should be made accessible to enable a thorough assessment and sampling by the environmental consultant and where required, remediation of these areas should be included in any Remediation Action Plan for the site.**

While some areas of the farm dump were not accessible, two targeted soil sampling locations were completed within the area of the dump during the detailed site investigation. These locations reported no concentrations of potential contaminants above guidelines, and given the size of the farm dump, two targeted samples are considered adequate to characterise the soil in this area.

A suitably qualified environmental consultant should be onsite during removal of farm dump to ensure remaining materials in the dump are inert waste, but no additional soil testing in the area is considered to be required unless potentially contaminating material is identified once vegetation is cleared. Disposal of the waste material from the farm dump should be undertaken in accordance with the relevant legislation/ guideline requirements and applicable waste management guidelines for Health Facilities.

iii) Confirmation that the sampling regime used meets the minimum recommendations of the NSW EPA contaminated land guidelines including NSW EPA Guidelines for Assessing Former Orchards and Market Gardens, Guidelines for Assessing Banana Plantations, and Sampling Design Guidelines.

Confirmed that sampling undertaken was based on the NSW EPA contaminated land guidelines for Assessing Former Orchards and Market Gardens, Guidelines for Assessing Banana Plantations, and Sampling Design Guidelines. In accordance with the guidelines, in the cultivated composite sampling was undertaken for analysis of samples i.e) each sample analysed was a composite of 4 subsamples. In the Stage 1 development footprint, 16 individual samples per hectare were collected, and composited into 4 samples for analysis. All individual samples were also submitted to the laboratory and placed on hold pending the analytical results of the composite samples.

A reduced sampling density (8 individual samples (2 composites) per hectare) was considered appropriate to characterise areas outside the Stage 1 development footprint. Proposed sampling densities were outlined in a Sample Analysis and Quality Plan (SAQP) and reviewed by an independent Certified contaminated land specialist prior to sampling works being undertaken.

iv) Provide the site Remediation Action Plan for review.

Remediation Action Plan has been provided to TSA management and NSW Health Infrastructure.

Possible Conditions:

- All works shall comply with the Remediation Action Plan and the requirements of SEPP 55 – Remediation of Land. Following remediation of the site, a validation report to the satisfaction of NSW Health Infrastructure shall be submitted confirming the subject site is suitable for the proposed use.
- In the event that potentially contaminating material or activities are discovered during demolition, excavation, or construction works, works shall cease immediately and a detailed contaminated site investigation and Remediation Action Plan be carried out by a suitably qualified environmental consultant in accordance with the NSW EPA contaminated land guidelines and the requirements of SEPP 55 – Contamination of Land to the satisfaction of NSW Health Infrastructure.

First comment acknowledged and considered appropriate

Second comment – further detailed contaminated land investigation is considered unnecessary. It is considered that in the event of unexpected finds of contaminated materials it would be appropriate to engage a Suitably qualified environmental consultant to characterise / delineate the identified contamination through sampling , and determine suitable remediation options and subsequent validation through addendum / revision of existing RAP for the site and in accordance with NSW guidelines.

Written / Submitted by:

Matthew Conroy
Principal Environmental
Scientist