

11 May 2018

Gerry Beasley
Walker Corporation Pty Ltd
Level 21, Governor Macquarie Tower
1 Farrer Place
Sydney NSW 2000

Dear Gerry,

Re: Senversa Interim Auditor Advice #4
Detailed Site Investigation Report – Wilton Junction, Hume Highway and Picton Road, Wilton

1. Introduction

Melissa Porter (the Site Auditor) of Senversa Pty Ltd (Senversa) has been engaged by Walker Corporation Pty Ltd (Walker) as a NSW Environment Protection Authority (EPA) Accredited Contaminated Sites Auditor for the portions of land owned by Walker at the intersection of Hume Highway and Picton Road, Wilton, named 'Wilton Junction' (hereafter referred to as 'the Site').

The Site is part of a larger development area proposed for mainly low density residential dwellings, with a town centre and areas for commercial, infrastructure and open space use. It is understood that an auditor approved detailed site investigation report is required as part of a development application submission for the Site.

2. Background and Previous Audit Work Completed

Jason Clay, also of Senversa, previously acted in the capacity of NSW EPA Accredited Site Auditor (accreditation number 0801) and completed a review of the following documents prepared by the environmental consultant, Douglas Partners Pty Ltd (DP), in relation to the Site:

- DP (2013). *Report on Phase 1 Contamination Assessment, Land Capability Assessment Wilton Junction, Hume Highway and Picton Road, Wilton*. Project 73467.00, dated August 2013.
- DP (2017a). *Addendum to Phase 1 Contamination Assessment Wilton Junction Rezoning, Hume Highway and Picton Road, Wilton NSW*. Project 73467.02 R.01.Rev3, dated 16 February 2017.
- DP (2017b). *Supplementary Phase 1 Contamination Assessment Wilton Junction Rezoning – Walker Land 1000 and 1010 Picton Road*. 73467.03 R001.Rev0, dated 3 March 2017.
- DP (2017c). *Proposed Residential Rezoning, Wilton Junction Rezoning – Walker Land, Wilton Junction, Hume Highway and Picton Road, Wilton, NSW*. Project 73467.04, dated 23 March 2017.

Jason Clay issued two interim audit advice letters ('IAA') providing review comments on the above documents. The IAA issued on 11 April 2017 (referenced S12947_LET02_11April2017), which included a review of the above documents and DP comments on the first IAA issued (referenced S12947_LET01_15March2017) concluded:



Based on the information provided in the DP reports and response to interim audit advice, the Auditor [Jason Clay] is satisfied that significant contamination has not been identified at the Site. The Auditor notes that further intrusive site investigations are proposed to inform the subdivision of the Site post rezoning and requests that the next stage of investigations include groundwater as well as soil investigations.

Melissa Porter has considered the previous investigations and concurs with the conclusions of those IAA.

Subsequently, DP completed intrusive investigation works detailed in the following report as part of the development application process:

- DP (2018). *Report on Detailed Site Investigation, Proposed Residential Subdivision, Stages 1 and 2, Wilton Junction, NSW*. 92269.00.R.001.Rev1, dated 19 April 2018, herein referred to as the 'the DSI'.

The Site Auditor previously issued comments on a draft version of the DSI (referenced 92269.00.R.001.Rev0 and dated 16 March 2018) on 3 April 2018 (referenced S12947_LET03_3April2018).

3. DSI Conclusions

The DSI concluded:

Based on the findings of the DSI, DP considers that [the] site is considered to have a generally low potential for contamination and is considered generally suitable, from an environmental perspective, for the proposed residential land use on the assumption that the identified TRH [total recoverable hydrocarbon] exceedances are subject to remediation. A Remediation Action Plan (RAP) will be required to document how the remediation works will be carried out.

Notwithstanding the above, the potential remains for isolated pockets of contamination to be present in areas of the site. To appropriately manage unexpected potential contamination issues encountered during development works, DP recommends the development and implementation of an Unexpected Finds Protocol.

4. Review

The Site Auditor has undertaken a review of the DSI against the requirements specified in the *Guidelines for the NSW Site Auditor Scheme (3rd edition)* (NSW EPA, 2017) and the *Guidelines for Consultants Reporting on Contaminated Sites* (NSW Office of Environment and Heritage, 2011), and with respect to the documents referenced in **Section 2**. The Site Auditor considers that the comments made in the IAA issued on 3 April 2018 have generally satisfactorily been addressed, although notes:

- The Site boundary has been extended along the eastern edge, although the Site area was not increased (provided as 101 hectares in both versions).
- The creeks and their flow directions were not identified onsite.
- Some of the ecological screening criteria for metals appear to be overly conservative (that is, less than the Added Contaminant Limits specified in the *National Environment Protection (Assessment of Site Contamination) Amendment Measure (No. 1)*, National Environmental Protection Council, 2013).
- No comment was made on the potential existence of an easement onsite.
- No comment was made on the potential for Area of Environmental Concern 35 being a former sheep dip (although the likelihood of this is considered to be low and acceptable by the site Auditor).



- A summary of the use of the onsite buildings was not provided.

However, these are not considered to be significant in the context of the Audit at this stage in the proposed development.

5. Auditor Conclusions

With reference to the IAA issued by Jason Clay (referenced S12947_LET01_15March2017), it is noted that no groundwater monitoring was undertaken at the Site. However, given that significant contamination was not identified; that the Site is overlain by clay; and that groundwater is expected at depths of greater than 40 metres below ground level, this is not considered to be a significant at this stage in the proposed development.

Therefore, based on the information provided in the DP reports and responses to IAA, the Site Auditor is satisfied that significant contamination has not been identified at the Site and that the DSI is suitable for the purposes of supporting a development application for the proposed uses, provided that a Remedial Action Plan (RAP) be developed which includes:

- an unexpected finds protocol;
- provision for a hazardous material building survey and sampling below the footprints of any buildings demolished or below the footprints of stockpiles of potentially contaminated material not previously sampled;
- a detailed waste management strategy to track waste movements around the Site and any disposal offsite. The waste management process should be documented in a manner which can be audited in accordance with Section 4.3.7 of the *Guidelines for the NSW Site Auditor Scheme (3rd edition)* (NSW EPA, 2017);
- provision for sample collection around the onsite dams (of surface water and sediment) and potentially the creeks;
- provision for the mitigation of potential impacts on the 'Special Area' to the south of the Site, which is currently being regulated by WaterNSW;
- consideration of groundwater results in reference to the criteria for irrigation and domestic stock (if groundwater sampling is undertaken);
- completing any additional asbestos analysis using gravimetric analysis, which has a lower limit of reporting than the presence/ absence methods; and
- employing appropriate quality assurance and quality control procedures.

The RAP should be subject to review by a site auditor and a Section B Site Audit Statement issued commenting on the suitability of the RAP.



6. Close

We trust this meets your requirements. Should you have any queries or require further information, please do not hesitate to contact the undersigned.

Yours sincerely,

On behalf of **Senversa Pty Ltd**

Melissa Porter

NSW EPA Accredited Site Auditor (0803)

Technical Limitations and Uncertainty – This Interim Advice is not a Site Audit Report or a Site Audit Statement, as defined in the Contaminated Land Management Act 1997, but forms part of the Site Audit process. It is intended that a Site Audit Statement and report will be issued at the completion of the site audit.

Consistent with NSW EPA requirements for staged “sign-off” of sites that are the subject of progressive assessment, remediation and validation, the Auditor is required to advise that:

- This site audit advice does not constitute a site audit report or statement.
- This letter is considered by the Auditor to be consistent with NSW EPA guidelines and policies.
- This letter will be documented in the final Site Audit Statement and associated documentation.
- At the completion of the site audit, a Site Audit Statement will be prepared, for the consent agency to include the Site’s property information, held by the local council.

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