

23 August 2023

BC200195.01

Dave Binny  
Director – Property & Sustainability  
Department of Veterans' Affairs  
dave.binny@dva.gov.au

Dear Dave

**Subject: 114 Newdegate Street Greenslopes - Review of Remediation Action Plan (RAP)**

## 1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) have been commissioned by Department of Veterans' Affairs (DVA) for the role of the Department of Environment and Science (DES) approved Contaminated Land Auditor (CLA) for the site at 51-55 Headfort Streets, Greenslopes formally known as Lots 123 to 125 RP46047 (the site).

This letter relates to the review of the following document:

- Tetra Tech Coffey Pty Ltd. 114 Newdegate Street Greenslopes. Draft Remediation Action Plan (RAP). Client: Department of Veteran Affairs. Rev 0 (dated 23 August 2023) (the RAP)

The RAP was prepared by Tetra Tech Coffey Pty Ltd (Coffey) with the nominated Suitably Qualified Person (SQP) being Mr Jeremy Wicks of Coffey.

## 2 BACKGROUND

The site is listed on the Environmental Management Register (EMR) for Hazardous Contaminants being previously detected in soil. As part of proposed redevelopment of the site, the site is proposed to be remediated and removed from the EMR.

It is understood that Condition 20 of Environment Protection and Biodiversity Conservation (EPBC) approval 2021-8997 requires:

*"The approval holder must prepare a Remediation Action Plan (RAP) to manage environmental and public safety throughout the action. The RAP must detail remediation and validation works to be undertaken within the action area. The RAP must be reviewed and endorsed by an independent contaminated land auditor. The approval holder must submit the endorsed RAP to the department within 10 business days of the RAP being endorsed by the independent contaminated land auditor. The approval holder must implement the endorsed RAP for the remediation and validation phase".*

As part of the remediation of the site, and to meet both NEPM 2013 and EPBC requirements, Coffey developed a RAP which outlines three objectives:

- Set the remediation objectives and outline a strategy that will mitigate contamination risks associated with the identified soil contamination to:
  - remove the site's listing from the EMR, negating the requirement for a Site Management Plan (SMP)
  - make the site suitable for all/any use
  - facilitate the transfer of land title to BCC.
- Provide procedures and plans for implementation during proposed remedial works
- Outline minimum environmental safeguards to complete the proposed remedial works at the site in a manner that minimises negative impacts upon the health of site workers and surrounding receptors, safety and the environment.

### 3 INDEPENDENT CONTAMINATED LAND AUDITOR

The individual that reviewed the RAP was Dr Louise Cartwright of Epic. Dr Cartwright is a DES CLA accredited to perform auditor's functions under s.568(b) of the Environmental Protection Act 1994 (CLA Approval No: CLAD010000640). It is confirmed that Dr Cartwright does not have any individual, financial, employment of family affiliation or any conflicting interests with the DVA.

### 4 RAP REVIEW

A technical review was completed on five versions of RAP Dr Louise Cartwright of Epic (versions: Rev C dated 25 January 2022; Rev D dated 27 March 2023; Rev E dated 1 August 2023; Rev E updated dated 7 August 2023; and Rev F dated 18 August 2023). The CLA provided the SQP with a comments log for each review, with the SQP addressing all comments, which has been provided in Appendix A as evidence of the review process. The RAP and the methods adopted are considered suitable in consideration of the assumptions and limitations noted within the report.

Independent assessment of the proposed remediation plan for the site at 51-55 Headfort Streets, Greenslopes completed as part of this review, finds that the proposed methodology is considered suitable for the site and includes both remediation and validation works to be undertaken.

### 5 FINAL NOTE

This letter is to confirm the RAP has been reviewed and endorsed by an independent contaminated land auditor.

The RAP notes it should be read in-conjunction with Tetra Tech Coffey (2022) 114 Newdegate Street Greenslopes Remediation Planning, Supplementary Investigation (Supplementary Investigation); and the EMP describes the environmental controls to be implemented during demolition of the buildings on the Site and remediation. A Draft Construction EMP for these activities is provided in Enviropacific Services (2022) Construction Environmental Management Plan, Department of Veterans' Affairs (DVA) – ACM Removal, Demolition, Site Stripping and Soil Remediation Works; Newdegate and Headfort Streets, Greenslopes, QLD, 4120.

This letter should not be considered pre-emptive of the final report submission for the site, but rather represents the CLA opinions based on the current review of available site information. The comments are not designed to be certification of meeting the requirements of Chapter 7, Part 8, ss. 370 to 408 EP Act (such as, contaminated land investigation document). Please note that the review of the documents has only considered the RAP contaminated land aspects of the site and does not address, or provide an opinion regarding, other aspects of the site or the environment not related to site contamination, such as (but not limited to): hazardous building materials in buildings or structures; or structures, footings, infrastructure, and the like, whether above or below ground; or the suitability of fill materials for any use and any geotechnical considerations; or regulatory responsibilities or obligations (for which a legal opinion should be sought); or the work health and safety legislation; or the suitability of any engineering design. If specialist technical review of such additional issues is required, then separate advice should be obtained from appropriate specialists.

It is expected that a detailed report will be prepared by the SQPs following completion of works to confirm compliance with project specifications and other relevant guidelines (e.g. ASC NEPM 2013).

Kind regards

Louise Cartwright  
Principal Environmental Scientist, Accredited  
Contaminated Land Auditor

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## APPENDIX A CLA COMMENTS LOG FOR RAP

**Audit Details**

**Project Reference:** BC200195.01  
**Site Address:** 51-55 Headfort Streets, Greenslopes 4120  
**Lot on Plan:** Lots 123, 124 and 125 on RP60407  
**Reviewed Document:** Department of Veterans Affairs, 114 Newdegate Street Greenslopes, Draft Remediation Action Plan (RAP) - Tetra Tech Coffey Pty Ltd. DRAFT Revf (dated 18 August 2023).  
**Document received:** On 18/08/23 received; and SQP's response to IAA003 comments register/log

**Table 1. Interim Auditor Comments IAC003 on the Draft (Rev F) Remediation Action Plan (RAP). Received 18 August 2023.**

Item	Section in Report	Report Section Name	Review #1 on RAP Rev D Epic Comments 30/05/2023	Review #1 SQP Response 01/08/2023	Review #2 on Rev E (dated 01/08/23) Epic Comments 03/08/2023	Review #2 SQP Response 07/08/2023	Review #3 on Rev E dated 07/08/23 Epic Comments 13/08/2023	Review #3 SQP Response 14/08/2023	Date Action Closed	Comment Status (Open / Closed)
1	NA	General	Epic have been commissioned by the Department of Veterans Affairs (DVA) to provide contaminated land auditing (CLA) services for the Environmental Site Investigation works at 114 Newdegate Street in Greenslopes.	Comment noted	-	-	-	-	3/08/2023	-
2	NA	General	It should be noted that the these CLA services for this site were undertaken in general accordance with the provisions of the <i>Environmental Protection Act 1994</i> (EP Act). Following the remediation of the property, it is understood a Contaminated Land Investigation Document (CLID) will be developed and a review by a certified Contaminated Land Auditor/Auditor will be completed in accordance with the provisions of Chapter 12 of the EP Act.	Comment noted	-	-	-	-	3/08/2023	-
3	NA	General	The comments and advice are provided to assist the Suitably Qualified Person (SQP) in progressing with finalising this Draft Remediation Action Plan (RAP). The information should not be considered pre-emptive of the final report submission for the site, but rather represents the Auditor's opinions based on the current review of available site information. The comments are not designed to be an endorsement or certification of meeting the requirements of the EP Act, but rather are considered as interim advice.	Comment noted	-	-	-	-	3/08/2023	-
4	NA	General	It is noted the document's Quality Information provided on page 2 of 76 indicates that previously issued draft Versions A (10/04/22), B (11/05/22), and C (12/05/22) of the Remediation Action Plan (RAP) (Ref.no. 754-BNEEN282781) were not issued to the Auditor for review and comment. Thus, Revision D (27/03/23) is the first time the Auditor has been presented with this information.	Comment noted	-	-	-	-	3/08/2023	-
5	NA	General	The Auditor was previously issued with Draft Revision C of the "Remediation Planning (RP), Supplementary Investigation", and issued audit comments to the SQP on 15/02/2022.  This RAP document appears to contain similar information which was presented in Revision C of the RP Supplementary Investigation document. Please address the Auditor's comments issued in interim auditor's comments log, IAC002 RP Rev C, dated 15/02/2022, and ensure these updates are reflected in this RAP document. In particular, please address previously issued IAC002 comment nos. 16, 17, 18, 19, and 20 which relate to potential data inconsistencies.	Response to comments on the RP (15/2/23) were provided to DVA for issue to the Site Auditor on the 12/5/22, and then sent directly from Tetra Tech Coffey to the Site Auditor on the 24/4/23.  Responses previously prepared by Tetra Tech Coffey have been incorporated into this response register and revised RAP as appropriate.	-	-	-	-	3/08/2023	Closed
6	NA	General	Please use abbreviations in full the first time in document. For example, the following acronyms have been used: TTC in Section 1.0, and ILS in Section 5.2.	The TTC abbreviation has been removed. The acronym for ILS has been added to Section 5.2	-	-	-	-	3/08/2023	Closed
7	NA	General	The document refers to an EMP throughout the RAP. Section 1.0 states "A Draft Construction EMP for these activities is provided in <i>Envirospacific Services (2022) Construction Environmental Management Plan, Department of Veterans Affairs (DVA) – ACM Removal, Demolition, Site Stripping and Soil Remediation Works, Newdegate and Headfort Streets, Greenslopes, QLD, 4120</i> ". Please confirm that the EMP discussed in the RAP is referring to the "Envirospacific Services (2022) Draft Construction EMP".	Confirming the EMP referred to in the RAP is the EPS Draft Construction EMP. Please refer to the added footnote in Section 1.	-	-	-	-	3/08/2023	Closed
8	1.0	INTRODUCTION	[Paragraph 6] Provide some context as to why DAWE, a federal department, is involved in this Queensland based project. For example, the site is owned by the Department of Veteran Affairs (DVA), a federal department.	The following sentences has been added to Paragraph 4 "The Site is owned by the DVA and is therefore located on Commonwealth land. The Commonwealth Department of Agriculture, Water and the Environment (DAWE) is advising DVA, at the Commonwealth level, on their environmental requirements and obligations."	-	-	-	-	3/08/2023	Closed
9	1.0	INTRODUCTION	[Paragraph 7] States this RAP should be read in conjunction with the "Remediation Planning (RP), Supplementary Investigation (TTC Supplementary Investigation)".  The Auditor was previously provided with the RP document (Draft, Revision C, dated 25/01/2022). On 15/02/22, the Auditor provided the SQP with comments on RP (Rev C). Please clarify whether the Auditor's comments on the RP (Draft Rev C) will be addressed and an updated RP will be provided to the Auditor for further review and comment.	Please refer to response to item 5.	-	-	-	-	3/08/2023	Closed
10	1.0	INTRODUCTION	[Par.8] Refers to the "Envirospacific Services (2022) Construction Environmental Management Plan (EMP), Department of Veterans Affairs (DVA) – ACM Removal, Demolition, Site Stripping and Soil Remediation Works, Newdegate and Headfort Streets, Greenslopes, QLD, 4120". This document has not been reviewed by the Auditor, and the Auditor has not provided comment with respect to the Draft Construction EMP.  Provide details on whether the Draft Construction EMP has been provided to DAWE for approval, and if the document has been approved.	DVA to confirm in the Construction EMP has been submitted to DAWEs and advise the Site Auditor. DVA to provide a copy of the Construction EMP to the Site Auditor.	Outstanding	Please note that DVA provided a copy of the Construction EMP on the 1/8	TTC/SQP has confirmed that Revision 1 (dated 20/04/2022) of the "Envirospacific Services (2022) Construction Environmental Management Plan (EMP), Department of Veterans Affairs (DVA) – ACM Removal, Demolition, Site Stripping and Soil Remediation Works, Newdegate and Headfort Streets, Greenslopes, QLD, 4120" (that was provided via email by DVA to Epic) is the correct version of draft Construction EMP.  Seek confirm from DVA, that the Draft Construction EMP was provided to DAWE for approval, and whether if the document has been approved by DAWE.	Please refer to DVA response 14/8/23 which confirms DAWEs approval of this document.	18/08/2023	Closed

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11	1.1.1	Remediation Contractor	Provide the name/details of the Remediation Contractor and their proposed representative. If no Remediation Contractor has been nominated, please state this in Section 1.1.1.	Please refer to changes to Section 1.1	-	-	-	-	3/08/2023	Closed
12	1.1.2	Suitably Qualified Person (SQP)	Similarly to above, state the name/details of the SQP and Consultant	Please refer to changes to Section 1.1	-	-	-	-	3/08/2023	Closed
13	1.1.3	Licensed Asbestos Assessor	Similarly to above, state the name/details of the Consultant and the nominated LAAs	Please refer to changes to Section 1.1	-	-	-	-	3/08/2023	Closed
14	1.1	Roles & Responsibilities	For completeness, suggest that the other key stakeholders (and their representatives) be identified, and their responsibilities/project scope of works be discussed. Other stakeholders may include the Client, Principal Contractor, CLA/Auditor, cartage contractor, and licenced disposal facility. This info could be tabulated and include the information currently presented in Sections 1.1.1 to 1.1.3.	Please refer to changes to Section 1.1	-	-	-	-	3/08/2023	Closed
15	2.0	OBJECTIVES OF RAP	Paragraph 5 of Section 1.0 Introduction states "in 2023 DAWE confirmed the additional requirement to remove the Site from the EMR as practicable". Update Section 2.0 to reflect that the following are also objectives: - Removal of Site from the Environmental Management Register (EMR). This means the Site will be suitable for any/all landuses, including the intended landuse of 'park and community use' - Site Management Plan (SMP) will not be required to be developed, if the Site is removed from the EMR	Please refer to changes to the objectives in Section 2.	-	-	-	-	3/08/2023	Closed
16	3.0	TECHNICAL AND REGULATORY FRAMEWORK	Provide a discussion on the regulatory framework of the proposed remediation works and RAP document in relation to assessing the site with respect to the Commonwealth EPBC Act and Queensland regulatory triggers.	Please refer to additional paragraphs added to the end of Section 3.	-	-	-	-	3/08/2023	Closed
17	4.1	SITE IDENTIFICATION	Please update Table 4-1 to include: - Site address: Include postcode - Lot/plan number: Provide land areas of each lot - Landuse: State former, and future landuse - Zoning: State future land zoning. Will the zoning need to alter to allow park/community use? - EMR/CLR status: State that each of the 3 lots are listed on the EMR and CLR. State the EMR site/lot ID numbers, and why each lot is listed on the EMR - Geographic coordinates or centroid (GDA2020)	Please refer to changes to Table 4.1	-	-	-	-	3/08/2023	Closed
18	4.2	ENVIRONMENTAL SETTING	(Topography & Drainage) - Comment on the topography of the Site, and if there are any falls across the Site - State the distance (i.e. metres) of the Site to Norman Creek (drain)	Falls were already stated in the Topography & Drainage item. Distance to Norman Creek Drain has been added to Table 4.2	-	-	-	-	3/08/2023	Closed
19	4.2	ENVIRONMENTAL SETTING	(Hydrogeology) - Provide details on aquifer types (unconfined, semi-confined, confined) and aquitards/aquicludes present - Provide details on current usage and likely resource potential	Relevant information on hydrogeology of the Site was included in Table 4.2. Further information on type of aquifer (unconfined, semi-confined, confined) and presence of aquitards/aquicludes is to be provided in the CLID at the completion of validation sampling.  The following sentence has been added to this item in Table 4.2. <i>Extraction of use of groundwater in the vicinity of the Site is considered unlikely based on the supply of reticulated potable water in Brisbane.</i>	(1) Closed on the understanding that further hydrogeology information will be included in the future CLID  (2) Closed	-	-	-	3/08/2023	Closed - will be addressed in CLID
20	4.2	ENVIRONMENTAL SETTING	Provide details of site-specific soil and geological records	Added in Table 4-2 in "Local Geology"	-	-	-	-	3/08/2023	Closed
21	5.0	PREVIOUS INVESTIGATIONS	The last paragraphs states "The following is a summary of the findings of the (RP) TTC Supplementary Investigation". Confirm that sub-sections 5.1 to 5.3 also summarise the findings of the Phase 1, Phase 2, and the 2019 delineation of organochlorine soil impacts. Update the sentence, if required.	Confirming that the Supplementary Investigation incorporated data and findings from these previous investigations. Data from previous investigations had also been incorporated into the RAP. Please refer to the 2nd last paragraph of Section 5 which states:  <i>Previous investigation sampling locations are shown in Appendix A, and the analytical data summarised in Appendix B.</i>  The following sentence has been added to Section 5: <i>The report on the Supplementary Investigation included data from the previous investigations.</i>	-	-	-	-	3/08/2023	Closed
22	5.2	CONTAMINATION	[Table 5-1] Include concentration units in the table heading row	Concentration units were stated in the first column of the table heading and have now been included in each column.	-	-	-	-	3/08/2023	Closed
23	5.2	CONTAMINATION	[Table 5-1] Given the paragraphs below Table 5-1 discuss exceedances of the adopted site assessment criteria (SAC) of NEPM HIL-A and HIL-C, suggest that Table 5-1 be amended to include: - New columns to present the adopted HIL-A and HIL-C criteria - Colour coding/shading of any maximum concentrations that exceed the adopted SAC. So it can tie in with Figure 3 - A summary of the information presented in Tables 5-1 and 5-2 (in the RP Supplementary Investigation) including the number of samples that exceed the HIL-A and HIL-F criteria for aldrin+dieldrin, chlordane and/or Cr(III+VI)	Please refer to the amendments to Table 5.1	[revised Table 5.1] Columns 7 & 8 present the number of soil samples exceeding HIL-A and HIL-B respectively. Clarify that the 'number of soil samples' relates to all samples and is not in relation to 'surface to 0.2 mbgs' or 'deeper than 0.2 mbgs' profiles.	Please refer to amendments to Table 5.1. Data has been included to show the number of samples which exceed HIL-A/HIL-C for both surface materials to 0.2 m bgs, and materials deeper than 0.2 m bgs.	-	-	12/08/2023	Closed

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24	5.2	CONTAMINATION	<p>[Discussion of OCP results]</p> <p>(1) Summarise the following information previously presented in Tables 8-1 and 8-2 of the RP Supplementary investigation document by specifying:</p> <ul style="list-style-type: none"><li>- The sample ID nos. of upper soil materials (0.0-0.2 mbgs) that exceeded the HIL-A and HIL-C criteria for both aldrin-dieldrin and chlordane.</li><li>- The sample ID nos. of the deeper soil samples (&gt;0.2 mbgs) that exceeded the OCP aldrin-dieldrin HIL-A and HIL-C criteria</li></ul> <p>(2) Make a comment that concentrations exceeding HIL-C also exceeded the adopted HIL-A criteria</p> <p>(3) It is noted that Figure 3 illustrates four sampling locations that exceed the NEPM HIL-D. Please include in Section 5.2, a discussion of these HIL-D exceedances (including soil sample ID nos.), and how it relates to the project. It is noted that a note on Figure 3 states comparison of concentrations against HIL-D was conducted to identify potential waste disposal facilities.</p>	<p>Refer to added Table 5-2</p> <p>Refer to added sentence after Table 5-2</p> <p>Refer to added last paragraph in Section 5.2</p>	<p>There appears to be discrepancies between the data presented in Tables 5.1 and 5.2. Please check all the listed soil sample IDs (in Table 5.2) and total numbers (in Table 5.1) to ensure the data correlates with each other.</p> <p>For example:</p> <p>(1) Table 5.1 states 18 soils samples exceeded the Aldrin+Dieldrin HIL-A criteria. However, Table 5.2 suggests that there were 15 soil samples (in upper soils 0.0-0.2 mbgs) and 2 soil samples in (&gt;0.2 mbgs). Please address the inconsistency.</p> <p>(2) Seven soil samples exceeded HIL-A (Table 5.1), but there are only 3 soil sample ID nos. listed in Table 5.2. Please address the inconsistency.</p> <p>(3) The maximum zinc concentration in Table 5.1 suggests the some soil samples exceeded the zinc EIL-res/open space. However, Column 7 states three samples exceeded the zinc HIL-A. Please amend.</p>	<p>1) Please refer to amendments to Table 5.1 and Table 5.2</p> <p>2) Refer to amendments to Table 5.1 and Table 5.2</p> <p>References to exceedances of HIL-A for zinc have been removed from Table 5-1 and Table 5.2. Note 1 has been added to Table 5-1 in regard to the exceedances of the EILs for Zinc.</p>	-	-	12/08/2023	Closed
25	5.2	CONTAMINATION	<p>[Discussion of ACM &amp; asbestos fines, pg 8 (pg13/76)]</p> <p>(1) Expand "ILs". Please use abbreviations in full the first time in document</p> <p>(2) Specify what were the adopted investigation levels (ILs) for asbestos fines</p> <p>(3) [8 bullet points]</p> <p>(a) Both A01 and A10 are listed twice in the bullet points</p> <p>(b) Figure 3 shows ACM was present at location no. 15, not SA10/A10. Please clarify, and (as required) amend report text or Figure 3</p> <p>(c) Specify which samples had 'ACM fragments' present, and which samples reported asbestos fines (in soil) exceeding the ILs</p> <p>(4) [Paragraph 2] Please clarify if this sentence should read "Fragments of ACM were not observed in the 2021 investigation and asbestos <del>fines were was</del> not reported in soil samples analysed in 2021."</p> <p>(5) [Par 3] Please clarify if this sentence should read "Soil materials, <del>while in the upper ground deposits (&lt;0.25 mbgs) have</del></p>	<p>1) Amended</p> <p>2) Refer to added amendments.</p> <p>3) Duplicate references to A01 and A10 have been removed. Figure 3 is correct. Please note that locations SA10/A10 and 15 represent the same sampling locations (the notation of ACM next to these locations is appropriate). For remediation planning purposes Tetra Tech Coffey considers it necessary to provide further detail on specific samples with samples exceeding ILs based on the following assumption which has been made in the RAP and for remediation planning purposes and stated in Section 5.2: "As a precautionary measure the upper soil deposits should be considered to contain ACM and there would also be the potential for fragments of ACM to be displaced into the upper soil deposits during demolition of the existing buildings." If the Site Auditor requires this Figure to be generated Tetra Tech Coffey suggested it be included in the CLID.</p> <p>4) The paragraph is correct. Only an asbestos presence/absence analysis was undertaken in 2021 and ACM fragments were not observed.</p> <p>5) Amended</p>	<p>(1) Closed</p> <p>(2) Closed</p> <p>(3a) Closed</p> <p>(3b) Noted that locations SA10/A10 and 15 represent the same sampling locations. Closed.</p> <p>(4) Closed</p> <p>(5) Closed</p>	-	-	3/08/2023	Closed	
26	5.2	CONTAMINATION	<p>[Discussion of metal concentrations, pg 8 (pg13/76)]</p> <p>Summarise the following information previously presented in Tables 8-1 and 8-2 of the RP Supplementary investigation by specifying:</p> <ul style="list-style-type: none"><li>- One surface soil sample (0.0-0.2 mbgs) exceeded the chromium (III + VI) HIL-A criteria. The Auditor notes that Table 5-1 indicates the sample's chromium concentration was 100 mg/kg which is equal to the HIL-A criteria. Amend information presented, if required.</li><li>- Seven samples of deeper soil material (&gt;0.2 mbgs) exceeded the chromium (III + VI) HIL-A criteria</li></ul> <p>This is relevant information, given a remediation objective is removal of the Site from the FMR</p>	<p>Please refer to the added text at the end of Section 5.2 in regard to Chromium which has been taken directly from the report on the Supplementary investigation. Chromium is present in soil as Chromium III and is not considered to be a driver for the remediation of the Site.</p>	-	-	-	3/08/2023	Closed	
27	5.2	CONTAMINATION	<p>[Discussion of metal concentrations, pg 8 (pg13/76)]</p> <p>Please confirm Cr speciation for Cr(III) and Cr(VI) was undertaken. If not, it is recommended this occur on the highest concentration sample/s</p>	<p>Refer to response to Item 27</p>	<p>SQP's response to comment #26 and the newly included text at the end of Section 5.2 is noted.</p>	-	-	-	3/08/2023	Closed
28	6.0	CONCEPTUAL SITE MODEL	<p>Primary and secondary sources of contamination are identified/listed. Please specify the contaminants of potential concern (CoPC) associated with these identified contamination sources.</p>	<p>Please refer to the following sentence added to the 2nd paragraph of Section 6. Contaminant of concern associated with the application of termiticides on the Site include OCPs (mainly aldrin and dieldrin), and asbestos. Other OCPs present in soil included DDT+DDD+DDO, endosulfan I, endrin, heptachlor, endrin aldehyde and endrin ketone.</p>	-	-	-	-	3/08/2023	Closed
29	6.0	CONCEPTUAL SITE MODEL	<p>It is suggested to present the conceptual site model (CSM) in a table with the headings of: source; CoPC; potential pathway(s); potential receptor; likelihood of a complete source-pathway-receptor relationship (e.g. likely, possible, unlikely, unknown); and provide rationale and comment on the pathway and receptor linkages.</p> <p>This proposed CSM table would clearly illustrate that all sources and receptors were identified, and which source-pathway-receptors are considered likely, possible or unknown for the site, and eliminate those which are unlikely (e.g. RAP indicates groundwater was considered low and unlikely).</p>	<p>Comment noted. A simplified CSM was presented in the RAP. A tabular style CSM will be included in the CLID/Validation Report.</p>	<p>Closed on the basis that a more comprehensive tabular style CSM will be presented in the future CLID/Validation Report.</p>	-	-	-	3/08/2023	Closed - will be addressed in CLID
30	6.1	REMEDIATION GOALS	<p>Should this be a Heading 1, i.e. Section 7.0 Remediation Goals?</p>	<p>Section heading has been amended.</p>	-	-	-	-	3/08/2023	Closed
31	6.2	REMEDIATION STRATEGY	<p>Should this be Section 6.1?</p>	<p>Section heading has been amended.</p>	-	-	-	-	3/08/2023	Closed

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32	6.2	REMEDIATION STRATEGY	<p>(1) Information in this section appears to focus on and discuss the 'adopted/selected remedial approach' for this project. Please include and discuss the assessment of remedial options. This discussion will then provide rationale for why the selected remedial approach was adopted.</p> <p>(2) Please include commentary on the implications of the Controlled Action (under the Commonwealth EPBC Act) on the proposed Remediation Strategy</p> <p>(3) Please include a discussion on constraints such as heritage features (brick façade and fence) and how this may affect, or won't affect, the proposed Remediation Strategy</p>	<p>1) The following paragraph has been added to Section 6.2 (now 7.1)</p> <p><i>Soils removed from the Site are to be disposed to a licenced landfill or beneficially reused at a resource recovery facility (refer to Section 8). Other potential remediation options such as containment (e.g. capping) were not considered based on the requirement from DAWE to remove the contaminated soil from the Site and the property from the EMR. Alternatives to disposal to a licenced landfill such as thermal destruction are considered cost prohibitive and were not considered further.</i></p> <p>The implications of the Controlled Action on the Remediation Strategy were discussed in the first two paragraphs of Section 6.2 (now 7.1).</p> <p>Constraints around heritage features have been removed from the RAP with the exception of the brick fence. The brick facade is being dismantled and removed from the Site. <i>Soil materials beneath the brick fence to be removed by hand (refer to Amendments to Area 2B in Table 7-1).</i></p>	<p>(Now Section 7.1)</p> <p>(1) Closed</p> <p>(2) Closed</p> <p>(3) Table 7.1 does not exist. Tables 8.1 and 8.2 (in Section 8.3: MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS) do not present information for Area 2B. Please clarify where this information is presented/discussed in this report.</p>	<p>3) The discussion on the materials requiring remediation has been <b>moved</b> to Appendix G.</p> <p>The area referred to in RAP Rev D as 2B is now referred to as Area 2.</p>			Closed	
33	6.3	REMEDIATION OBJECTIVE	Should this be Section 6.2?	Section heading has been amended.	-	-	-	-	3/08/2023	Closed
34	6.3	REMEDIATION OBJECTIVE	Make comments/statements on the alternative remediation objective of 'remediate the site to make it suitable for parkland use (i.e. meet adopted SAC of NEPM HIL-C (park/community landuse setting))', in the event OCP contaminated soil can not be removed to extent to allow removal of the Site from the EMR. This may mean the Site remains on the EMR with a SMP to ensure it is suitable for parkland use.	Refer to added paragraph at the end of 6.3 (now 7.3)	Additional paragraph is noted. Last sentence of additional paragraph states "This may mean the Site remains on the EMR with a SMP to ensure it is suitable for parkland use. <b>Note on ecological receptors</b> ". Amend to re-create subheading of "Note on ecological receptors".	Sub-heading created	-	-	12/08/2023	Closed
35	6.4	REMEDIATION CRITERIA	Make a comment that HIL-C criteria will be adopted in the event of the 'alternative' remediation objective.	Refer to response to item 34	-	-	-	-	3/08/2023	Closed
36	7.1	SITE ESTABLISHMENT	Provide comment on the responsible party(s)	Refer to added first sentence.	-	-	-	-	3/08/2023	Closed
37	7.2	VEGETATION CLEARING	Provide comment on the responsible party(s)	Refer to added first sentence.	-	-	-	-	3/08/2023	Closed
38	7.3	EXCAVATION	Provide comment on the party(s) responsible for undertaking, supervising and/or directing the excavation works.	Refer to added first sentence.	[Changed to Section 8.3] Correct following typo error in first sentence "The Principal Contractor/Remediation Contractor will be responsible for undertaking, supervising and/or directing the excavation works."	Amended	-	-	12/08/2023	Closed
39	7.3	EXCAVATION	[Table 7-1, rows "Area 1" and "Area 3"] To provide clarity, suggest rewording to "OCPs in Area xx exceed both NEPM HIL-A and HIL-C guidelines for residential areas with accessible gardens, and parks/open space areas, respectively."	Refer to amendments.	[Former Table 7-1 has been reworked into Appendix G: Materials Requiring Remediation	-	-	-	3/08/2023	Closed
40	7.3	EXCAVATION	[Table 7-1, rows for Areas 2A, 2B, 3, 4A & 4B] These areas refer to 'unsuitable fill material'. Specify the reasons why this material is considered unsuitable.	The term Unsuitable Fill Materials is defined beneath Table 8-1. The sentence has been modified to make it clear that the term applies throughout the RAP.	-	-	-	-	3/08/2023	Closed
41	7.3	EXCAVATION	[Table 7-1, row "Area 4A"] (1) To provide clarity, as to why there is a requirement to excavate/remediate, suggest rewording to "Detectable OCP concentrations were observed in the perimeter of Area 4A (at sampling locations BH01, BH03, BH12). These detectable OCP concentrations are below the NEPM HIL-A guidelines for residential areas with accessible gardens; however, they exceed the adopted remediation criteria of standard 1 OR". (2) For accuracy, suggest rewording to "... around the perimeter of this area which adjoin Area 1, <b>Area 2A</b> and Area 2B"	Refer to amendments.  Tetra Tech prefers the current wording as it is applicable to the results for this area.	-	-	-	-	3/08/2023	Closed
42	7.3	EXCAVATION	[Table 7-1, row "Area 4B"] For accuracy, suggest rewording to "... perimeter of Area 4B which adjoins Area 1, <b>Area 2A</b> and Area 2B and disposal to ..."	Tetra Tech prefers the current wording as it is applicable to the results for this area.	-	-	-	-	3/08/2023	Closed
43	7.3	EXCAVATION	Table 7-1 and Section 7.4 indicate that Areas 1, 2A, 2B, and 3 will be excavated in two layers - generally surface layer 0-0.25 mbs and a deeper layer either 0.25-0.5 mbs or 0.25-0.6 mbs. The 2 layers are described as Type 1 and Type 2 Materials. Type 1 Materials will be disposed to licenced landfill facility under soil disposal permit (SDP). Whilst Type 2 (without ACA) will be either disposed to licenced landfill facility under SDP, or reused at a licenced resource recovery facility. Thus, please amend the volumes in Table 7-2 to reflect this by including columns for: - Surface soil layer (Type 1 Materials) - assumed excavation depth - Surface soil layer (Type 1 Materials) - assumed excavation volume - Underlying deeper soil layer (Type 2 Materials) - assumed excavation depth - Underlying deeper soil layer (Type 2 Materials) - assumed excavation volume	<p>Please refer to the revisions in Section 8.3 MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS. Reference to Type 1/Type 2 materials has now been removed to simply the document.</p> <p>Table 8-1 summarises the materials to be removed including excavation depth/volume from ground surface to 0.25 m bgs.</p> <p>Table 8-2 summarises the materials to be removed including excavation depth/volume from ground surface to 0.25 to 0.4 m bgs.</p>	<p>[General Comment] The content of former sections, 'Section 7.3 Excavation' and 'Section 7.4 Management of Excavated Materials' have been reworked into new 'Section 8.3 Material Requiring Remediation &amp; Management of Excavated Materials' and new 'Appendix G Materials Requiring Remediation'. New Tables 8-1 and 8-2 have been created.</p>	-	-	3/08/2023	Closed	

Item	Section in Report	Report Section Name	Review #1 on RAP Rev D Epic Comments 30/05/2023	Review #1 SQP Response 01/08/2023	Review #2 on Rev E (dated 01/08/23) Epic Comments 03/08/2023	Review #2 SQP Response 07/08/2023	Review #3 on Rev E dated 07/08/23 Epic Comments 13/08/2023	Review #3 SQP Response 14/08/2023	Date Action Closed	Comment Status (Open / Closed)
44	7.4	MANAGEMENT OF EXCAVATED MATERIALS	(1) A note on Figure 3 states comparison of concentrations against HIL-D was conducted to identify potential waste disposal facilities. Provide a discussion (in this section) on how the use of HIL-D criteria will be used to assess and identify potential waste disposal sites/facilities. (2) Present the HIL-D criteria in the Appendix B Data Tables (3) Clarify why the waste acceptance criteria (provided in Appendix C) are not also referenced on Figure 3 (4) Provide comment on the party(s) responsible for managing excavated materials, applying for Soil Disposal Permits (SDPs), etc.	1) and 2) Please refer to statement in the 3rd paragraph of Section 8.3, i.e.: Materials excavated from these depths are to be recovered for beneficial re-use at the BMI Group at the Redbank Resource Recovery Facility. BMI Group has advised that this facility can receive soil materials with contaminant concentrations below NEPM HIL-D human health guidelines for beneficial re-use at this facility for future commercial/industrial use, and provided the material does not contain ACM and demolition materials such as broken brick, concrete, timber etc. Tabulated data which includes the NEPM HIL-D criteria has been included in Appendix B.  3) Figure 3 is intended to show sample locations which exceed the Human Health Investigation Levels, and was not required by recipient waste management facilities.  4) Please refer to footnote 14 which has been added to Section 8.3, and the first sentence which has been added to Section 8.3.	-	-	-	-	3/08/2023	Closed
45	7.4	MANAGEMENT OF EXCAVATED MATERIALS	[Subheading "Note on Queensland Waste Levy"] (1) Paragraph 2 states "OCs present on the Site (aldrin, dieldrin, chlordane, and heptachlor) were...". The results presented in this report indicate that concentrations of aldrin-dieldrin and chlordane exceeded HIL-A and HIL-C criteria. Whilst there were detectable heptachlor concentrations in soil samples, these concentrations did not exceed the heptachlor HIL-C or HIL-A criteria. The current sentence could be misinterpreted and infer that heptachlor also exceed criteria and is also a CoPC. Suggest the wording be revised to avoid any potential misunderstanding. (2) It is noted the SQP believes disposal of soil materials to landfill facilities will attract the Waste Levy, as no information was available (at the time of RP Supplementary Investigation, Jan 2023) to confirm OCPs were applied prior to 1 January 1992. Please confirm if records of historic site management practices have been since obtained from the Client to verify if OCPs were applied prior to 01/01/1992. (3) Provide comment on the party(s) responsible for the completing and submitting the waste levy exemption application	1) This paragraph has now been removed from the RAP.  2) and 3) A Waste Levy Exemption has been granted for the site. Please refer to Section 8.3 and Appendix E.  Please refer to footnote 14 which has been added to Section 8.3 which clarifies that the Waste Levy Application was prepared by Tetra Tech Coffey.	-	-	-	-	3/08/2023	Closed
46	7.4.1	Temporary Stockpiling	(1) Clarify if temporary stockpiles will require bunding (2) Provide comment on the party(s) responsible for undertaking, supervising, directing, managing, and/or tracking the temporary stockpiling works	1) Refer to amendments to last paragraph 2) Refer to added first sentence.	[Changed to Section 8.4] (1) Closed. (2) Closed.	-	-	-	3/08/2023	Closed
47	7.4.2	Unforeseen Contamination	Clarify the party(s) that will provide the 'on-site competent person', and define what constitutes a competent person.	The term Competent Person was defined in Section 3.1 under the Principal/Remediation Contractor roles and responsibilities.	[Changed to Section 8.5] Footnote was provided.	-	-	-	3/08/2023	Closed
48	7.6	VALIDATION SAMPLING	General comments applicable to Section 7.6 and its subsections: (1) Nominate the primary and secondary NATA registered laboratories (2) Discuss laboratory QA/QC that will be applicable for this project (3) Discuss data quality indicators (DQIs) that will be applicable for this project (4) Discuss calculation of RPDs	1) Refer to added footnote 2) Refer to 8.6.4 and amendments to this section 3) Refer to Appendix D 4) Refer to added Table 8-3	[Changed to Section 8.7] (1) Closed (2) Table 8-3 provided in Section 8.7.4. Closed. (3) Noted new 'Appendix F Data Quality Objectives' has been provided (4) Closed.	-	-	-	3/08/2023	Closed
49	7.6	VALIDATION SAMPLING	(1) Provide rational to support to use of 1 sample per 100m2 (i.e. a 10m by 10m grid) over the base of an excavation as being sufficient (rather than 5 x 5 m grid)  (2) It is understood that the excavations will vary between 0.25 m deep (in Areas 4A & 4B), 0.5 m deep (Areas 2A & 2B) and 0.6 m deep (Areas 1 & 3). Clarify if validation sampling of walls will be undertaken, and/or at what excavation depth would trigger the requirement to undertake excavation wall validation sampling. Will validation wall sampling be conducted along the site's northern and eastern boundaries?	1) The area of the site is approximately 0.2 ha. Under the NSW EPA Sampling Guidelines 2022 (which has a grid based sampling strategy similar to the former Australian Standard AS4482.1-2005) the number of sampling points for an area of 0.2 ha is 8 for the detection of a hotspot. The no. of sampling locations proposed for the Site is 20 based on the site area and is considered to be conservative. Notwithstanding a tighter sampling grid can be undertaken if required from the Site Auditor.  2) Validation sampling along the walls of excavations is not proposed based on the sampling density proposed at the base of excavations. Validation sampling can be undertaken along the walls of the site northern and eastern boundaries. The following has been included in the RAP.  "Validation samples will be collected along the walls of the northern and eastern site boundaries from at 0.1 m depth at 10 m spacings along the wall of the excavations."	AS4482.1 is referring to investigation of a site. The NSW Sampling Guidelines Section 5.5 discusses validation in Section 5.5 with the base samples "will depend on the CSM for the site, and the rationale should be clearly documented in the RAP". A sampling grid of 5x5m grid would be more appropriate unless further rational is provided	The sampling grid of 5 x 5 m has been adopted.	-	-	12/08/2023	Closed
50	7.6.4	Field Quality Control Samples	(1) Provide sampling frequency of intra-lab and inter-lab duplicates, rinse blanks, and trip blanks (2) Provide rational as to why trip spikes are not considered necessary	Please refer to amendments to Section 8.6.4	1) Amendments made to Section 8.7.4. Closed. (2) Nomenclature for trip spikes is discussed in Section 8.7.1; however, Section 8.7.4 does not provide information as to why trip spikes are not considered necessary for the proposed site remediation and validation.	-	-	-	12/08/2023	Closed
51	7.7	REINSTATEMENT OF EXCAVATIONS / IMPORTED FILL	(1) Specify who is responsible for developing and maintaining the records of imported soil/fill material (2) Suggest Table 7-3 be retitled to "Imported Fill Material Criteria" (3) Suggest that the actual detection limits / levels of reporting (LORs) for the primary and secondary NATA labs be presented in Table 7-3	1) Please refer to the added sentence to Section 8.7  2) Heading of table has been amended  3) Tetra Tech prefers not to include detection limits noting that different laboratories have different LORs.	-	-	-	-	3/08/2023	Closed
52	7.8	INSPECTIONS	Clarify if the SQP will also: - Check that record keeping (such as material tracking, etc.) is occurring as part of their regular inspections - Check that erosion and sediment control (ESC) measures are in good working order to prevent offsite migration from the remediation areas	Please refer to amendments to Section 8.8	Amendments made to (new) Section 8.9.	-	-	-	3/08/2023	Closed



Item	Section in Report	Report Section Name	Review #1 on RAP Rev D Epic Comments 30/05/2023	Review #1 SQP Response 01/08/2023	Review #2 on Rev E (dated 01/08/23) Epic Comments 03/08/2023	Review #2 SQP Response 07/08/2023	Review #3 on Rev E dated 07/08/23 Epic Comments 13/08/2023	Review #3 SQP Response 14/08/2023	Date Action Closed	Comment Status (Open / Closed)
53	9.0	HEALTH, SAFETY AND ENVIRONMENTAL CONTROLS	General comments applicable to Section 9.0 and its subsections: [1] Address environmental controls for noise, odour, and unexpected contamination	The items have been added to the second list of bullet points in Section 10.1	It is noted that a site specific safety plan will be prepared by the contractor to address environmental controls. However, a RAP is expected to provide commentary on the environmental controls to be implemented to minimise noise nuisance, odour nuisance, and unexpected contamination. Will the SSSP be reviewed by Coffey / CLA prior to site works?	The Principal Contractor prepared health and safety plan and CEMP will be reviewed by Coffey, and Coffey will ask DVA for EPS to provide these documents to the Site Auditor. Please note that unexpected (unforeseen) contamination is discussed in Section 8.5 of the RAP. Coffey has not included noise controls in the RAP noting these would be in the Construction EMP. The contaminants of concern for the Site are not odorous and odours are not expected to be generated during remediation. Please see added footnote on the bottom of the page at the start of Section 10. Accordingly discussion on the management of odours has not been included in the RAP. Dust however requires management and is discussed in Section 10.9.	Noted. It is expected the SQP will complete review of the EPS's H&S Plan and Construction EMP prior to commencement of remediation works.	Yes, the SQP will review the Construction EMP and H&S Plan prior to the commencement of remediation works.	18/08/2023	Closed
54	9.1	OCCUPATIONAL HEALTH AND SAFETY	[last paragraph] Clarify if the Principal Contractor (PC) is the same party or a different party from the Remediation Contractor. This is the first time in the report the use of the PC term has been used.	The term Principal Contractor/Remediation Contractor has now been used throughout the RAP.	[Changed to Section 10.1]	-	-	-	3/08/2023	Closed
55	9.3	RECORD KEEPING	[Par 2 bullets] Suggest the following be also recorded: - Remediation Area (e.g. Area 1, 2A, 2B, etc.) where the excavated material originated from - Estimated excavation volume - Company name of the cartage contractors, if multiple contractors are being used	These items have been added to first list of bullet points in Section 10.3.	-	-	-	-	3/08/2023	Closed
56	9.8	DESIGNATED WASH DOWN AREA	States "All vehicles are to be washed in the wheel wash bay prior to leaving the compounds". Provide details on: the capture; onsite retention; whether onsite treatment will occur; and discharge (to sewer under trade waste permit, or stormwater?) or offsite disposal of washwaters.	The following sentence has been added at the end of Section 10.8 "Wastewater from wheel washdown should be removed as a regulated waste by an appropriately licenced contractor."	[Changed to Section 10.8] For clarity, suggest that new sentence be amended to "The design of the wheel wash bay area will allow for capture of wastewater and removal by an appropriately licenced contractor for offsite management/disposal as regulated waste."	Text amended to include Site Auditor recommendation.	-	-	12/08/2023	Closed
57	9.9	DUST SUPPRESSION	Specify the party(s) who is responsible for deciding when dust suppression techniques are to be implemented and ceased.	Refer to added first sentence.	-	-	-	-	3/08/2023	Closed
58	9.10	AIR MONITORING	Specify the party(s) who are responsible for: - Implementing and undertaking air monitoring - Assessing and reporting the monitoring results - Making the decision to stop works (e.g. if results exceed the adopted air quality criteria)	Refer to amendments to Section 10.10	-	-	-	-	3/08/2023	Closed
59	9.12	SURFACE WATER DISCHARGE AND MONITORING	[1] Specify the party(s) who is responsible for managing accumulated surface water, sampling and testing, and discharge [2] Provide details on whether discharge will occur to stormwater or to sewer under trade waste permit, and if onsite treatment will occur prior to release	1) Refer to added first sentence. 2) As stated in Section 10.12 water generated during construction will be disposed off-site as a regulated waste or discharged to stormwater if compliant with the guidelines included in this Section. The Principal Contractor/Remediation Contractor does not plan to treat on-site or discharge water to sewer.	[Changed to Section 10.12] (1) Closed (2) SQPs clarifications has indicated that paragraph 2 implies "accumulated surface water can be released to stormwater provided that it has been sampled and tested, and the resultant quality meets the EMP requirements". Closed	-	-	3/08/2023	Closed	
60	10	CONTINGENCY PLAN	[Table 10-1] (1) Unexpected contamination findings: Consider adding anthropogenic materials which pose physical hazards (i.e. sharp and angular) as an 'aesthetically unacceptable material' (2) Discovery of underground tanks during excavation works: Consider adding heavy metals to the minimum suite of contaminants	1) Items added to table. 2) Item added to table.	-	-	-	-	3/08/2023	Closed
61	NA	Figure 2	[Legend] - Add the installation date/year of groundwater monitoring well location, MW01  - Clarify if the "areas sealed with concrete" was still present at the time of the RAP document (i.e. still present as of March 2023)	The installation data/year for MW01 has been included as a footnote Section 4.2, and 2021 has been added to Figure 2.  The concrete was present in March 2023 however the site is currently undergoing demolition work. Please refer to added note to Figure. Note the Principal Contractor/Remediation Contractor does not plan to treat on-site or discharge water to sewer.	-	-	-	-	3/08/2023	Closed
62	NA	Figure 3	(1) [Legend] Clarify if the "areas sealed with concrete" was still present at the time of this RAP document  (2) Appears to illustrate the fill depths for only: (a) the 2021 investigation sampling locations; and (b) other previous investigation locations, only if there's the presence of ash, slag, ACM &/or other anthropogenic materials (wood, brick, etc.). Please show the depths to fill (or state "no apparent fill") for the 2019 sampling locations and other locations with prefixes of HA, SA, SG, SS, and A.  (3) Clarify if the ACM was observed at the surface or within fill material (and at what depth)	Please refer note added to the figure. Refer to additional comments on Item 61.  Fill depths were included in Figure 3 where the depth of fill was proven. This included locations in the 2021 investigation and a limited number of locations in other previous investigations (e.g. S404/A04). Where the depth of fill has been proven it is shown on the figure. Anthropogenic materials reported in the 2021 and other previous investigations were also included in this figure.  ACM was not observed in 2021, and was observed at ground surface in previous investigations. Please refer to additional comments on Item 25.	Noted.	-	-	-	3/08/2023	Closed
63	NA	Distribution table (pg 2 of 120)	-	-	Correct the distribution date from "31 July 2023" to "1 August 2023".	Amended	Given Revision E was revised again and provided to Epic on 08/08/23, please correct the three dates from "1 August 2023" to "8 August 2023".	Revision dates to be corrected in the RAP which has been re-issued.	18/08/2023	Closed
64	NA	Acronym List	-	-	Remove the acronym of POEO which is NSW legislation.	Removed	-	-	12/08/2023	Closed
65	1.1	Roles and Responsibilities	-	-	[Table 1-1, Client row] Presents an empty bullet point in Column 4. Clarify if there is missing information.	Amended	-	-	12/08/2023	Closed
66	1.1	Roles and Responsibilities	-	-	[Table 1-1, "Principal Contractor / Remediation Contractor" row, sub bullet 1] States "identify soil materials containing ACM". Is this inferring that Envirospac has licenced asbestos assessor (LAA) capabilities, or that they need to be able to visually identify soil materials suspected of containing ACM?	Please refer to amendments. Tetra Tech Coffey expects that Principal Contractor will have a Competent Person who can visually identify potential ACM during excavation.	-	-	12/08/2023	Closed
67	1.1	Roles and Responsibilities	-	-	[Table 1-1, "DES-Approved Contaminated Land Auditor" row, sub bullet 1] Suggest inclusion of the following responsibility "Undertake role of DES approved contaminated land auditor (CLA) and conduct auditing services in accordance with provisions of Chapter 12, Part 3A of the Environmental Protection (EP) Act 1994"	Amended	-	-	12/08/2023	Closed
68	1.1	Roles and Responsibilities	-	-	[Table F-1 General comment] "Environmental Consultant" is used in Section 10.1 and Table F.1 (Appendix F). Is the environmental consultant equivalent to the SQP company, TTC, or another entity? If required, include the new role into Table 1-1. Alternatively, maintain consistency in the report and amend,	The term Environmental Consultant has been changed to SQP.	-	-	12/08/2023	Closed

Item	Section in Report	Report Section Name	Review #1 on RAP Rev D Epic Comments 30/05/2023	Review #1 SQP Response 01/08/2023	Review #2 on Rev E (dated 01/08/23) Epic Comments 03/08/2023	Review #2 SQP Response 07/08/2023	Review #3 on Rev E dated 07/08/23 Epic Comments 13/08/2023	Review #3 SQP Response 14/08/2023	Date Action Closed	Comment Status (Open / Closed)	
69	7.3	REMEDIATION CRITERIA	-	-	[Par.1] States "For OCPs the proposed remediation criteria <u>are the standard LOR</u> from the NATA accredited laboratory Eurofins or ALS. For Eurofins these range from 0.05 mg/kg to 0.1 mg/kg". Seeking further clarification. If the reported concentration is equal to the LOR, is this acceptable or unacceptable? Must all OCPs report concentrations be less than the LOR to be considered acceptable?	Please refer to amendment in the first sentence of Section 7.3. DAWEs requirement is to remediate the site such that OCPs are not above (non-detectable) the standard limit of laboratory reporting (LOR). Please note that concentrations do not need to be less than the LOR.  Coffey has inserted an additional sentence to clarify that if it is not practicable to achieve non-detectable concentration for OCPs the NEPM HIL-A is to be adopted such that the property can be removed from the EMR.	-	-	12/08/2023	Closed	
70	8.0	REMEDIATION PLAN	-	-	[1st sentence] States "For remediation planning the Site has been segregated into six areas which are shown in Figure 4, Figure 4A and Figure 4B, Appendix A." Figures 4a and 4b and Tables B-1 and B-2 suggest the site has been divided into ten areas. Please resolve this inconsistency.	Refer to amendment to first sentence.	-	-	12/08/2023	Closed	
71	8.3	MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS	-	-	[General Comment to set context of Auditor's understanding]  The content of former sections, 'Section 7.3 Excavation' and 'Section 7.4 Management of Excavated Materials' have been significantly reworked into new 'Section 8.3 Material requiring Remediation & Management of Excavated Materials', Tables B-1 and B-2, and new tables in 'Appendix G Materials Requiring Remediation'.  It is understood the intent of new Section 8.3 and Appendix G is to present and summarise the following key steps/methodology of: - Step 1: Collating all the soil data from previous investigations to identify soil locations which have exceeded the adopted remediation criteria (Section 7.3). Presenting this information graphically on Figure 3 - Step 2: Using the exceedances to define the extents of the areas requiring remediation via excavation and offsite disposal. Presenting this information graphically on Figures 4A and 4B - Step 3: Identifying appropriate disposal facilities to accept the material. This was done through discussion with receiving disposal facilities and comparison of onsite soil concentration results to the facility's waste acceptance criteria  Please clarify if the Auditor has correctly interpreted the intent of new	The Auditor has correctly interpreted Section 8.3 and Appendix G.	-	-	12/08/2023	Closed	
72	NA	Appendix G: Materials Requiring Remediation	-	-	[Step 3: Identifying appropriate disposal facilities] First table (Surface to 0.25 mbs) in Appendix G states "Materials in these areas (Areas 1A, 1B, 1C, and 3C) are to be excavated to 0.25 m bps for disposal to monofill as contaminated soil potentially containing ACM". Please clarify, as it is understood that exceedances of the lined landfill criteria specified for total OCPs, lead, and/or chromium would be driver, not ACM.	Disposal to monofill is based on exceedance of lined landfill acceptance criteria for OCPs either as a Total or TCLP concentration. Table C has been added to Appendix G to clarify sample locations which exceeded lined landfill acceptance criteria.	[Table C, Appendix G] Refer to comment #89.	-	-	12/08/2023	Closed
73	8.3	MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS  and Appendix G: Materials Requiring Remediation	-	-	[Step 3: Identifying appropriate disposal facilities] First Table (Surface to 0.25 mbs) in Appendix G  Clarify that material from Area 3C is required to be disposed to monofill due to TCLP. Please clarify why Area 1C is not considered suitable for disposal to lined landfill. If required, amend Table B-1, Appendix G, and/or Figure 4A.	Please refer to Table C included in Appendix G. Two samples in Area 3C exceeded lined landfill acceptance criteria for Total OCP - refer to . The recipient landfill has advised that it cannot receive these materials to lined landfill.	- Revised/corrected Appendix B data tables (provided 7/8/23) now show two exceedances of dieldrin in TCLP. - [Table C, Appendix G] Refer to comment #89.	-	-	12/08/2023	Closed
74	NA	Appendix G: Materials Requiring Remediation	-	-	[Step 3: Identifying appropriate disposal facilities] First table (Surface to 0.25 mbs) in Appendix G  (1) To easily identify which soil sampling locations have exceeded the site remediation criteria, please specify/state (in Column 2), which soil sampling locations have exceeded the adopted site remediation criteria for all ten areas (i.e. Areas 1A-1C, 2, 3A-3C, and 4A-4B)  (2) With respect to Areas 1A, 1B, 1C, and 3C, also specify/state which soil sampling locations have exceeded the lined landfill  (3) Provide rationale and commentary for how the polygons of monofill areas 1A, 1B, 1C, and 3C were determined. Please show (on Figure 4A) the sampling locations which were used to determine the extents of the monofill areas. In particular, how was the thin rectangular polygon of 3C determined in relation to Areas 3B and 3A.	1) Please note that at the remediation requirement of DAWEs in non-detect adding this information to Appendix G would make the table unwieldy. Sample locations with detectable concentrations are included in Appendix B.  2) This information has now been included in Table C, Appendix G.  3) This information has now been included in Table C, Appendix G.	- Noted. New Figure 4 titled Remediation Plan was provided 7/8/23. - [Table C, Appendix G] Refer to comment #89.	-	-	12/08/2023	Closed
75	NA	Appendix G: Materials Requiring Remediation	-	-	[First table, Area 2 row] States "OCPs in Area 2 exceed NEPM HIL-A guidelines for residential areas with accessible gardens". Please clarify which soil sampling locations within Area 2 exceeded HIL-A? As quick review of the Data Tables (Appendix B) did not identify OCP exceedances at any of the locations within Area 2 (e.g. BH10; h202; BH17; 32; SS01; BH12; 5; 4; 2; 1; SA05/A05; 3; etc.) If required amend.	Please refer to amendments to Area 2 in Table A, Appendix G.	-	-	12/08/2023	Closed	
76	NA	Appendix G: Materials Requiring Remediation	-	-	[First table, Area 3A & 3B row] States "OCPs in Area 3A/3B exceed NEPM HIL-C and NEPM HIL-A guidelines for...".  (1) Please clarify which soil sampling locations exceed HIL-A or HIL-C in Area 3B? As Figure 3 does not show any soil sampling locations in Area 3B. If required amend.  (2) Provide rationale as to why material in Areas 3A must be disposed to lined landfill. Figure 3 suggests that sampling locations 7, Slag1, and Slag2 are within Area 3A. A quick review of the Data Tables (Appendix B) did not identify OCP exceedances at any of these locations.  (3) Provide rationale and commentary on how the polygons for Areas 3A, 3B, and 3C were determined. Please show (on Figure 4A) the sampling locations which were used to determine the extents of Areas 3A to 3C.	1) The description to Area 3A/3B has been amended in Table A. Concentrations were below the NEPM HIL-A. Sample locations 6,7 and 4,5 are considered to be representative of these areas.  2) Please note that area 3A/3B are to be disposed to lined landfill based on the detection of OCPs and the requirement from DAWEs to remediate to non-detects for OCPs.  3) Area 3C relates to the garden bed immediately adjacent to the building (please refer to Table C in Appendix G). Areas 3A and 3B are north and south of this area. Sample locations within Area 3C have been described in Table C.	(1) Closed (2) Closed (3) [Table C in Appendix G] Refer to comment #89.	-	-	12/08/2023	Closed
77	NA	Appendix G: Materials Requiring Remediation	-	-	[2nd table, Area2 row] Correct typo error of "Area 2" to "Area 2"	Amended	-	-	12/08/2023	Closed	

Item	Section in Report	Report Section Name	Review #1 on RAP Rev D Epic Comments 30/05/2023	Review #1 SQP Response 01/08/2023	Review #2 on Rev E (dated 01/08/23) Epic Comments 03/08/2023	Review #2 SQP Response 07/08/2023	Review #3 on Rev E dated 07/08/23 Epic Comments 13/08/2023	Review #3 SQP Response 14/08/2023	Date Action Closed	Comment Status (Open / Closed)
78	8.3	MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS	-	-	Table 8-2] States the excavation depth for Area 2 is 0.25-0.40 mbgs. However, Table 8-1 states Area 2 will be excavated to a depth of 0.2 mbgs. Clarify the discrepancy between 0.25 and 0.2 mbgs. As required, amend Tables 8-1, 8-2, and/or Appendix B first table.	Please refer to the amendments to the table headings.	-	-	12/08/2023	Closed
79	8.3	MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS	-	-	Provide commentary on: (1) The proposed order/sequence to undertake excavation of the areas summarised in Tables 8-1 (material 0.0-0.25 mbgs) and 8-2 (material between 0.25-0.40 mbgs) (2) Whether validation sampling will be undertaken progressively during excavation works, or in stages.	1) Please refer to the added sub-heading/sentence prior to Section 8.4. The principal contractor proposed to excavate north to south.  2) Refer to added first sentence in Section 8.7.	-	-	12/08/2023	Closed
80	8.3	MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS	-	-	Table 8-1 and Par 1 under Waste Levy Exemption sub-heading] Have incorrectly used the environmental authority numbers (issued to the licenced facility) as the issued Disposal Permit (SPD) numbers. Please correct to refer to the relevant Soil Disposal Permit (SPD) numbers (i.e. SDP010002171 or SDP010002201).	Amended	-	-	12/08/2023	Closed
81	8.3	MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS	-	-	Table 8-1] Clarify the Auditor's interpretation and application of the following table notes is correct: (1) [Note 1] Excavation of soils underlying the concrete slab in Area 4B is not proposed. However, in the event that unsuitable fill material is encountered/present, shallow material will be excavated for offsite beneficial use at BMI Group's Redbank Resource Recovery Facility. Please clarify (in the note text) if unsuitable fill material (that is found to be present) must be removed to make it suitable for recovery and beneficial use. Ifs required, also reflect this in the tables in Appendix G. (2) [Note 2] Was the 150m3 volume soil disposal permit (SDP) estimated by 70m3 x 1.5 (50% contingency factor x 1.4 bulking factor? While the other 500m3 volume SDP was estimated by 355m3 x 1.4 bulking factor (i.e. no contingency applied)?	1) The recovery of unsuitable materials at the BMI Group Redbank Resource Recovery Facility has been added to Appendix G.  2) The volumes in the Disposal Permits are ex-situ volumes. A bulking factor of 1.4 was used to estimate ex-situ volumes. The monocoil volume includes a 50% contingency.	-	-	12/08/2023	Closed
82	NA	General comment - inconsistent data	-	-	Data appears to be inconsistent between the soil results (shown in Appendix 8 Data Tables), Figure 3, and Table 5-2, and possibly Table 5-1.  For example: Data table (pg. 46of 120) shows the aldrin-dieldrin concentration (17.49mg/kg) at sample location 34-0.0mbgl exceeds HIL-C (orange shading), however, Figure 3 shows location 34 as exceeding HIL-A (green circle). Furthermore, location 34 isn't listed in Table 5-2.  Other data inconsistencies appear to exist for: 36; 8H08(0.3); 8H07(0.3); 8H06(0.5); 8H16(0.1); HA03 (0.0-0.1); HA02(0.0-0.1); 8H14(0.1); 15(0.0); 11(0.0) & 11(0.45); 8(0.0); and HA07/SA12 and 13H(0.0)/HA07.  Please review and (as required) amend.	Exceedences in Figure 3 have been corrected. Location 34 has been added to Table 5-2  Location 36, HA03, HA02, BH14, 11, & HA07/13P have been amended in Figure 3. The legend in Figure 3 has been amended to state that exceedence relates to OCPs. Sample locations with Chromium exceeding the NEPM has not been shown as an exceedence in Figure 3 based on the Note of Chromium included in the RAP/Supplementary Investigation.	Changes to the intent of Figure 3 to only show exceedances in relation to OCPs (not other CoPCs such as Cr etc.) is noted.	-	12/08/2023	Closed
83	NA	Appendix B: Data Tables	-	-	TCLP data, page 72 of 120] It is understood that the TCLP data for lined landfill criteria (of 0.03 mg/L) shown for dieldrin is incorrect. The correct criteria should be 0.01 mg/L. Thus, the dieldrin TCLP results reported for soil sampling locations 11-0.0 (0.02 mg/L) and 34-0.0 (0.012 mg/L) should be shown shaded as existing the lined landfill criteria. Please correct.  Please also check all TCLP criteria and results data to ensure accurate information is presented.	Appendix 8 data tables have been amended.	-	-	12/08/2023	Closed
84	NA	Appendix F: Data Quality Objectives & Indicators	-	-	Table F.1, row 4. Define the boundaries of the study] Incorrect reference to Figure 3. Please amend.	Amended to refer to Lot and Plans which make up the site.	-	-	12/08/2023	Closed
85	NA	Appendix F: Data Quality Objectives & Indicators	-	-	F.2 Data Quality Indicators, Table A] (1) [Row 1] There's a reference to PFAS (2) Expand acronym "SOPs" (3) [Row 4] correct type of "Experienced Tetra Tech Coffey Environmental Scientists conducted will be the sampling."	1) Amended 2) Amended 3) Amended	-	-	12/08/2023	Closed
86	NA	Appendix F: Data Quality Objectives & Indicators	-	-	F.2 Data Quality Indicators, Table B] Expand acronym "TTMP"	TTMP has been changed to Tetra Tech Coffey	-	-	12/08/2023	Closed
87	NA	Appendix F: Data Quality Objectives & Indicators	-	-	F.2 Data Quality Indicators, Table D] Incorrect reference to Section 13.3	Amended	-	-	12/08/2023	Closed
88	NA	Appendix F: Data Quality Objectives & Indicators	-	-	F.2 Data Quality Indicators, Table E] There appears to be a description mix up between Trip Blank and Field Blank. Please address.	Amended	-	-	12/08/2023	Closed
89	NA	Appendix G: Materials Requiring Remediation	-	-			<b>New Table C</b> provides details on the delineation of areas requiring offsite disposal to monocoil. (1) [Area 1B row] Revised Figure 3 and new Figure 4 (both issued 7/8/23) show location S502 exceeding HIL-D for OCPs. Clarify why location S501 is not included as part of the polygon for Area 1B (which requires disposal to monocoil), and doesn't appear to influence the shape of Area 1B? (2) [Area 3C row] States "Area 3C has been assumed to include materials in the garden bed from sample location 3 to approximately 2.5m west of HA02". Please clarify that the eastern and western boundaries of Area 3C were delineated by the physical extents of the garden bed (that would have had pesticides applied), which can be described as location 3' and 'approximately 2.5m to the west of HA02', respectively. (3) [Area 3C row] Locations 6P and 7P are not shown on revised Figure 3 and new Figure 4. Should the text be referring to locations "6P" and "7P" (4) [Area 3C row] Please clarify if locations Slag1 and Slag2 are also part of Area 3C.	1) Locations at the southern boundary of this area including S502, HA11, SA09/09, BH13, HA11, 16 do not exceed lined landfill acceptance criteria. S501 (and the adjacent BH12) also do not exceed the lined landfill criteria. S501/S502 with the symbology of exceeding HIL-D were added to Figure 3 based on asbestos fines and have now been removed too keep the figure consistent with the legend which relates to OCP exceedences only.  2) The following has been included in Table C to define the location of Area 3C on the site. "Dimensions of Area 3C: Within the garden bed the eastern most extent of Area 3C starts at 15 m from the eastern property boundary. The length of this area is 21 m and its width is the width of the garden bed (see photograph below table)".  3) 6P and 7P are resamples of HA02 and HA03. This is now included in Figure 3. Note the Figure 4 was included as an error in the attachments provided on the 7/8 and has now been removed.  4) Slag 1 and Slag 2 are part of Area 3C.	16/08/2023	Closed

Item	Section in Report	Report Section Name	Review #1 on RAP Rev D Epic Comments 30/05/2023	Review #1 SQP Response 01/08/2023	Review #2 on Rev E (dated 01/08/23) Epic Comments 03/08/2023	Review #2 SQP Response 07/08/2023	Review #3 on Rev E dated 07/08/23 Epic Comments 13/08/2023	Review #3 SQP Response 14/08/2023	Date Action Closed	Comment Status (Open / Closed) <sup>12</sup>
90	NA	Appendix G: Materials Requiring Remediation					<p>The depth interval of 0.2 or 0.25 (Table B) has not been justified.</p> <p>Table B notes: "While the majority of OCP contamination is expected to be within the first 0.2 m bgs of soil, based on the existing data OCP contamination extends further into deeper soil deposits (0.4 to 0.5 m bgs)." Have the borelogs been considered?</p> <p>It is noted that ACM is considered to only impact shallow fill material however, this is based on borehole / hand augers. Should additional ACM be encountered this shall need to be managed appropriately and depth intervals updated.</p>	<p>Excavation depths have been changed to 0.25 m across all areas.</p> <p>Please refer to Section 9.1 in the report on the TTMP (2022) 114 Newdegate Street Greenhouses Remediation Planning, Supplementary Investigation which discusses the vertical distribution of OCPs in soils. Two sample locations 11 and 10 reported elevated concentrations at approximately 0.45 m and were considered to be more likely false positives based on the lines of evidence presented in the report.</p> <p>These samples will not change the management of the material in these areas. The sample depths 11 and 10 are in areas where the planned excavation depths are to 0.4 m. The excavations will be subject to validation sampling. If elevated concentrations of OCPs are found at the planned excavation depths which exceed the remediation criteria than further excavation may be required in consultation with DVA and the Site Auditor.</p> <p>Comment noted. ACM at depth will be managed as an unexpected find.</p>	18/08/2023	Closed
90	NA	New Figure 4	-	-	-	-	<p>It is noted that a new figure, Figure 4, was provided in a 6-page file named &lt;Appendix A Figure 3.pdf&gt;.</p> <p>Please clarify why Area 3C is not shown on this new Figure 4.</p>	Figure 4 was provided as an error (figure has been superseded) and has been removed.	18/08/2023	Closed
91	NA	Revised Figure 4A	-	-	-	-	<p>Two versions of Figure 4 were emailed on 07/08/23 to the Auditor in the following files:</p> <ul style="list-style-type: none"> <li>- File &lt;Appendix A Figure 4A Amendment.pdf&gt;. This is a 3-page pdf; and</li> <li>- File &lt;Appendix A Figure 3.pdf&gt;. This 6-page file has copies of Figures 1, 2, 3, 4, 4A, and 4B.</li> </ul> <p>The two versions of Figure 4 show different boundary shapes of Area 1B - please resolve and reissue Figure 4.</p>	Please note comment above.	18/08/2023	Closed
92	NA	New Figure 4 & revised Figure 4A (both issued 7/8/23) and Table C in Appendix H	-	-	-	-	<p>Please resolve the following inconsistencies between New Figure 4 (in file Appendix A Figure 3.pdf) &amp; revised Figure 4A (in file Appendix A Figure 4A Amendment.pdf):</p> <ul style="list-style-type: none"> <li>- Square area around location 34 (along the site's northern boundary) is labelled Area 2C on Figure 4, and labelled 1C on Figure 4A.</li> <li>- Area 1A shown on Figure 4A is broken up into two areas, Areas 1A and 1C on Figure 4.</li> <li>- The boundaries and shape of Area 1B are different on Figures 4 and 4A</li> </ul> <p>Please resolve these inconsistencies and reissue the amended figure(s). Ensure the areas discussed in Table C of Appendix G relate to the corrected figures. For example, currently, Table C doesn't present information/details for Area 2C (which is shown on Figure 4). As required, reissue Appendix G.</p>	Please note comment above. Figure 4 was provided in error (figure has been superseded) and has not been included in the revised RAP. Figure 4A (provided as single pdf page) is correct and aligns with Table C in Appendix C. Figure 4A has been included in the RAP.	18/08/2023	Closed
93	8.3	MATERIALS REQUIRING REMEDIATION AND MANAGEMENT OF EXCAVATED MATERIALS	-	-	-	-	<p>Table 8-1 states onsite material will be disposed at: Veolia Ti Tree bioENERGY Facility; BMI Stapylton Resource Recovery Facility; and BMI Redbank Resource Recovery Facility. Disposal at Ti Tree and Stapylton will be done under soil disposal permits.</p> <p>Provide details of how waste volumes will be accepted by the Redbank Resource Recovery Facility, and what are considered to be the CoPC with respect to the contaminants of interest and the criteria for this facility.</p>	<p>Information on the Redbank Resource Recovery Facility was included in the Supplementary Report and RAP. This facility can receive soil materials with CoPC below NEPM HIL-D and provided the materials do not contain asbestos, putrescible materials and demolition materials. The results of the investigation have been provided to this facility, and the facility has confirmed that materials identified for re-use at this facility can be accepted. Volumes are included in Section 8.3 of the RAP. Please note the a Disposal Permit is not considered to be required for the movement of material to this facility on the basis that OCP concentrations in soil materials deeper than 0.2 m are below HIL-A. The UCL95 (calculated using ProUCL) for Aldrin+Dieldrin for samples deeper than 0.2 m is 2.3 mg/kg with the results from 10 and 11 included. If the data for 10 and 11 is excluded the UCL95 is 0.645 mg/kg.</p> <p>The SQP will provide further information on the facility to the Site Auditor in an email including the UCL outputs.</p>	18/08/2023	Closed