22 February 2022

Olter Investments Pty Ltd
c/o PBD Architects
Level 2 - 52 Albion Street SURRY HILLS 2010

Ref: E052

Attention:
Sent via Email: hector@pdbarchitects.com.au
cc: Jodiepears@gmail.com

Dear Hector,

RE: Interim Audit Advice – 71-75 Victoria Road, Drummoyne NSW

Introduction

I have been engaged by Olter Investments Pty Ltd (Olter) to conduct a site audit of the above site in accordance with the NSW Contaminated Land Management Act 1997.

The site has previously been used for commercial/industrial uses including boating services, vehicle dealership, service station and vehicle repair facility, and is to be redeveloped as a multi-storey mixed retail and residential building with two levels of basement carparking.

The site contains two adjoining light commercial buildings:

- 71 Victoria Road (Lot 1): A brick single and double storey building (slab on ground construction) constructed prior to 1930. The building is currently used by Anytime Fitness and
- 73 Victoria Road (Lot 2): a two-storey commercial building with single level basement (RL 24.83mAHD) constructed circa 2004, currently being used by The Party People. Prior to construction of this building (and basement excavations) lead and PAH impacted fill material was excavated and visually validated prior to basement excavation.

A combined preliminary and detailed site investigation (DSI) has recently been prepared by EIAustralia. The investigation encountered some PAH impacted fill material on the Lot 1 (71 Victoria Road) site. EIA concluded that there was no evidence of gross or widespread soil and groundwater contamination, and the site can be made suitable for the proposed development subject to preparation of a remediation action plan (RAP) for remediation of localised fill impacted by PAH, removal of underground storage tanks (if encountered) and validation of final excavation surfaces (following removal of fill material). Subsequently EIA prepared a RAP to document the proposed remediation strategy.

A DA has been submitted to Canada Bay Council (council) for the proposed development. Following review of the application, council identified a number of data gaps (with respect to contamination) and advised the proponent that:

a) A Remedial Action Plan (RAP) is to be submitted to Council, prepared by a suitably qualified and competent environmental consultant in accordance with the NSW Government Office of Environment and Heritage, Guidelines for Consultants Reporting on Contaminated Sites and Planning NSW Guidelines " Managing Land Contamination Planning Guidelines"

Note: Prior to consent being granted the RAP must be reviewed by a NSW EPA Accredited Site Auditor and a Section B Site Audit Statement issued which states that the RAP is practical and the site can be suitable for the proposed use if the RAP is implemented.

Scope

The following reports have been reviewed by the auditor in preparing this IAA:

- A.D. Envirotech Australia (2000). Stage II Environmental Investigation, 71-75 Victoria Road, Drummoyne NSW, Project No.0515, for Mr J.B. O'Leary, dated 29 November 2000.
- EI Australia (2021). Preliminary and Detailed Site Investigation, 71-75 Victoria Road, Drummoyne NSW, Report No. E24806.E02_Rev1, dated 27 October 2021.
- EI Australia (2021). Remediation Action Plan, 71-75 Victoria Road, Drummoyne NSW, Report No. E24806.E06_Rev0, dated 14 December 2021.
- Letter Re: 'Site validation, 73 Victoria Road, Drummoyne', 25 July 2003. Prepared by Environmental Consulting Services for Brecon Builders.
- Letter Re: 'Soil Classification, 73 Victoria Road, Drummoyne', 11 August 2003. Prepared by Environmental Consulting Services for Brecon Builders.
- Letter Re: 'Site validation, 73 Victoria Road, Drummoyne', 17 August 2003. Prepared by Environmental Consulting Services for Brecon Builders.
- Letter Re: 'Groundwater Investigation, 71-75 Victoria Road, Drummoyne NSW', 2 February 2022. Prepared by EIA.

In addition, the auditor completed a site visit on 16 December 2021.

Site Description

Site location (Attachment 1) and identification details are as follows:

Street Address	71-75 Victoria Road, Drummoyne NSW
Identifier	Lots 1 & 2 DP1050010.
Local Government Area	City of Canada Bay
Owner	Olter Investments Pty Ltd
Site Area	1,350 m^2
Zoning	B4 – Mixed Use

Site History

Historically the site has been used for commercial/industrial uses including service station, smash repair shop, mechanics workshop, boating centre and vehicle dealership. The bowsers and refuelling infrastructure for the service station may have been located on the Victoria Rd frontage of Lot 1 in an area of the site that was later acquired for widening of Victoria Rd.

The adjacent (upgradient) site was previously used for potentially contaminating uses including a service station and motor mechanic. Although the site has since been subject to investigation and remediation prior to redevelopment.

Summary of Site Investigations

Investigation locations were constrained by existing buildings and sampling locations were located in accessible areas of the site. Sampling locations are shown on Attachment 1.

The subsurface conditions generally included variable depths of fill (to maximum 0.7m) underlain by silty clay (natural residual) and bedrock (Hawkesbury Sandstone).

The regional aquifer (Hawkesbury Sandstone) is considered a semi-confined to unconfined aquifer depending on local geology and is likely to occur below the bulk excavation level (BEL). However, some shallow groundwater seepage was encountered during drilling at 4mbgl within the weathered sandstone (likely to be associated with defects in the sandstone). Standing water level (SWL), measured 5 days after well installation, was reported to be 7.1mbgl.

Fill, typified by observations of ash, slag and elevated B(a)P concentrations was present across the Lot 1 portion of the site. This was confirmed through use of the PAH source analyst calculator[1] which correlated the PAH profile to ash from black coal. Given the investigations use the boreholes there is the potential for ACM to be present in the fill material and this must be managed during the excavation process.

Lot 2 (existing basement), sampling has confirmed that fill material has been removed and soil conditions and sampling results are consistent with background concentrations representative of natural residual clay.

The former service station was located at the front of Lot 1 in an area that was later acquired for widening of Victoria Road. The building has been present since 1930's and the probability of USTs located under the existing building on Lot 1 is low. Notwithstanding this, the potential for presence of USTs (and any localised soil impact) is to be addressed through the proposed remediation.

Due to the constraints of existing buildings only one groundwater monitoring well was installed. This was located within the rear yard of Lot 1. Petroleum hydrocarbons were reported at low concentrations (below screening criteria and considered low risk) in the groundwater at this location. EIA considered that the presence of hydrocarbons in groundwater likely to be from historical operation of a service station on the adjacent property or possibly the subject site.

Some minor concentrations of copper and zinc (exceeding ecological screening criteria) were also identified in the groundwater. EIA considered these "…*to be indicative of background conditions in an urban environment and expected to attenuate between the site and Parramatta River."*

Remediation

Based on the results of the results of the investigations, EIA prepared a remediation action plan that identified the preferred remediation approach as excavation and off-site disposal of fill within the basement excavation (defined by development footprint).

A range of remediation options were considered by EIA, noting limitations due to the proposed development excavations, small areas of fill material to be retained and generally low levels of contamination encountered. The on-site (or off-site) treatment of the impacted soil is not a viable option given the small size of the site and generally low levels of contamination encountered. Therefore, on-site containment or off-site disposal are acceptable remediation options with respect to NSW EPA policy. In consideration of the proposed basement excavation, the preferred remediation option of excavation and off-site disposal is appropriate.

Several remedial contingencies have been included in the RAP for specific potential problems including USTs, residual soils at the boundary, asbestos and groundwater impact. Where groundwater impact is encountered remediation options include natural attenuation, extraction, bio-remediation, phase-separated hydrocarbons (PSH) recovery using active pumping (including hydraulic control), installation of a groundwater permeability barrier, in situ oxidation or stabilisation. Where vapour risks are identified installation of a vapour barrier or passive or active vapour extraction system will be implemented. Implementation of the groundwater contingencies will require revision of the RAP.

In the auditors opinion the remedial strategy (with respect to soil contamination and service station infrastructure) has a low risk of failure, as validation failure would lead to further excavation. However, the potential for groundwater impact must be fully assessed before the RAP is finalised.

EIA prepared a letter dated 2 February 2022, recommending that, in order to further characterise the groundwater, two additional monitoring wells should be installed to target the eastern corner of the site and northwestern boundary. However due to the location of existing buildings and underground services EIA consider that the groundwater investigation can only be practically completed after building demolition.

Auditors Opinion

The RAP presents a reasonable and practical strategy to render the site suitable for the proposed use providing that additional groundwater investigations confirm that no significant groundwater contamination

[1] www.pahsourceanalyst.com.au

issues. If risks to the development (or via off-site migration) due to the presence of groundwater contamination are identified, the RAP must be revised to address this.

Given the existing site constraints the auditor agrees that additional groundwater investigations cannot reasonably be completed until after building demolition has occurred.

Conclusions

The proposed remediation strategy documented in the RAP provides a practical and achievable basis to successfully remediate the site for the proposed use subject to the following conditions:

1. Completion of additional groundwater investigations after building demolition. If risks to the development (or via off-site migration) due to the presence of groundwater contamination are identified, the RAP must be revised to address this.
2. The RAP must be reviewed and approved by a NSW EPA accredited site auditor prior to implementation.
3. At the completion of remediation work, issue of a site audit statement and site audit report certifying that the site is suitable for the proposed use.

* * *

Consistent with the NSW EPA requirement for staged 'signoff' of sites that are the subject of progressive assessment, remediation and validation, I advise that:

- This advice letter does not constitute a Site Audit Report or Site Audit Statement.
- At the completion of the audit, I will provide a Site Audit Statement and supporting documentation.
- This interim audit advice will be documented in the Site Audit Report.

Yours faithfully,
Envirocene Pty Ltd

Julie Evans
NSW EPA Accredited Site Auditor 1003

Attachments:

Attachment 1: Site Locality & Investigation Locations

LEGEND (All Locations are Approximate)

- Site boundary
- Basement 1 boundary
- Basement 2 boundary
- Previous hand auger location (EI, 2021)
- Previous borehole location (EI, 2021)
- Previous monitoring well location (EI, 2021)
- Previous Sub-slab soil vapour location (EI, 2021)

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Drawn:	AM.H.
Approved:	E.S.
Date:	2-12-21

Olter Investments Pty Ltd
Remediation Action Plan
71-75 Victoria Road, Drummoyne NSW
Sampling Location Plan (EI 2021)

Figure: 2

Project: E24806.E06