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16097_IA5_ Amended RAP Endorsement 30 August 2018.docx

30 August 2018

Dicker Data
c/- Development Consultants International
(DCI NSW Pty Ltd)
Attention Mr Geoffrey Hill
Po Box 246 Annandale NSW 2038

Via email: ghill@devkon.com.au

Dear Geoffrey

Re: Interim Advice No.5 – Endorsement of Amended Remediation Action Plan (WSP, February 2018) for 238-258 Captain Cook Drive, Kurnell NSW

A. Introduction

Development Consultants International, on behalf of Dicker Data, has appointed Rebeka Hall of Zoic Environmental Pty Ltd (Zoic), a NSW EPA accredited Site Auditor (No.0802), to conduct an audit of the property located at 238-258 Captain Cook Drive Kurnell NSW 2231 ("the site"). The site is identified as Lot 1 in DP225973 and Lot 2 in DP1088703, and occupies a total area of approximately 17.2 hectares.

The purpose of the non-statutory audit engagement is to confirm, with an interim advice letter, that the site can be made suitable for the proposed use which will comprise a newly constructed warehouse and office space for the current owner, Dicker Data.

The Audit is being conducted in accordance with the NSW EPA (2017) Contaminated Land Management Guidelines for the NSW Site Auditor Scheme (3rd edition).

Reported site history indicates that the site was reclaimed from swampland in the early 1960s before being developed in 1963 for the manufacturing of healthcare products (notably penicillin and codeine-based products) by Abbott Pharmaceuticals which ceased production in 2003. Portions of the site were leased between 2012 and 2015 for warehousing, fibreglass products manufacturing, equipment and materials storage yard for an earthmoving company and horse agistment WSP, December 2017). Following a site inspection by the Auditor in August 2017, it was observed that demolition works had progressed, with the majority of site structures demolished to slab level.



B. Scope of Audit and Nature of Interim Advice

NSW EPA (2017) Contaminated Land Management Guidelines for the NSW Site Auditor Scheme (3rd Edition), describes the site assessment and audit process as:

1. The contaminated land consultant, or other relevant party, designs and implements the site assessment and, where required, all remediation and validation activities achieve the stated objectives; and
2. The site auditor independently reviews the works undertaken to ensure that they comply with current regulations, standards and guidelines, and that the site has been assessed, remediated and validated to a standard appropriate to the proposed land use.

Therefore, the contaminated land consultant and other relevant parties should be satisfied that the work to be conducted conforms to all appropriate regulations, standards and guidelines and is suitable based on the site history and the proposed commercial/industrial land use.

C. Current Interim Advice

The purpose of the current Interim Advice No. 5 (IA5) is to provide the Auditor's opinion on whether the site can be made suitable for the proposed development. This advice also provides the Auditor's endorsement of the remedial approach as presented in the following report prepared by the appointed environmental consultant, WSP Australia Pty Limited (WSP):

- WSP Australia Pty Limited (27 February 2018) Remediation Action Plan 238-258 Captain Cook Drive Kurnell NSW (Ref: 2270393A RAP Captain Cook Drive Kurnell (Revised) Final V4)

The remediation action plan (RAP) has been evaluated against the requirements outlined in NSW EPA (2017) Contaminated Sites: Guidelines for the NSW Site Auditor Scheme (3rd edition) and other guidelines made or endorsed by NSW EPA.

The Auditor has previously issued four interim advices (IA1, 3 April 2017; IA2, 21 June 2017; IA3, 29 September 2017 and IA,4 14 Dec 2017), which provided comment on past environmental investigations and various versions of the RAP as documented in the following reports:

- CH2MHILL (Auditor – Ross McFarland) (25 October 2004) Statutory Site Audit Statement (SAS) and SAR for "Filter Cake Disposal Area", Abbot Australasia Pty Limited, Captain Cook Drive, Kurnell, NSW (Ref: 2003/02).
- JBS Environmental Pty Limited (JBS) (September 2005) Supplementary Investigations, 260 Captain Cook Drive, Kurnell, NSW (Ref: JBS 30201 – 10346 (Final));
- WSP (February 2008) Environmental Status Review, 238-258 Captain Cook Drive, Kurnell, NSW (Ref: 1-07-171 RP01 Final rev 0);
- Environmental Earth Sciences (EES) (16 October 2012) Soil sampling and investigations, 238-258 Captain Cook Drive, Kurnell, NSW (Ref: 112072_V1).
- WSP Australia Pty Ltd (23 March 2017) Summary Report – 238-258 Captain Cook Drive Kurnell NSW.
- WSP Australia Pty Limited (11 May 2017) Draft Remediation Action Plan, 238-258 Captain Cook Drive, Kurnell, NSW (Ref: 2270393Av1).
- WSP Australia Pty Limited (8 August 2017) Remediation Action Plan, 238-258 Captain Cook Drive, Kurnell, NSW (Ref: 2270393Av2).
- WSP Australia Pty Limited (5 December 2017) Remediation Action Plan 238-258 Captain Cook Drive Kurnell NSW (Ref: 2270393A RAP Captain Cook Drive Kurnell Finalv3)



Note:

This current advice (IA5) supersedes IA4, issued by the Site Auditor on 14 December 2017, which was submitted as part of the State Significant Application (SSA) for the proposed development lodged with Department of Planning & Environment. The Auditor has reviewed the revised WSP RAP (27 February 2018) and confirms no change to the remedial strategy originally proposed in RAP (WSP, 5 December 2017).

Therefore the Auditor's conclusions presented in IA4 remain valid for the endorsement of the current WSP RAP (Version 4) as outlined below.

D. Summary of the Proposed Remedial Strategy

Based on the Auditor's review of the RAP (27 February 2018) the proposed remedial strategy is as follows:

- Complete additional investigations to address gaps in site characterisation data as identified in Section 4.4 and 6 of the RAP.
- Emu pick any surface fragments containing asbestos, followed by asbestos clearance.
- For soil/fill impacted material above the adopted site suitability criteria, excavate and dispose offsite.
- Backfilling of excavations with ENM material.
- For areas where impacted material cannot be removed, the contamination will be consolidated and a cap and contain approach adopted, with residual impact subject to a long term Environmental Management Plan (EMP).
- The cap and contain strategy is proposed for asbestos containing concrete (originating from existing structures) which will be retained onsite as part of the proposed development either within landscaped mounds or within slabs over which further structures will be built.
- Following the delineation of any impacted groundwater, conduct a risk assessment and ongoing monitoring as required.

E. Auditor Endorsement

Given the available site information as presented in the above reports, results do not indicate gross contamination being present at the site. However, it is noted that large parts of the site have not been previously investigated due to the presence of former buildings and underground infrastructure or areas omitted from any investigation (for example the pond, the vegetation corridor and Aboriginal archaeological zone).

The strategy as presented in the RAP provides a scope of work to close out gaps in information, notably confirming quality of residual soil following the removal of buildings and structures, confirmation that asbestos impacted surface soils (potentially arising from damage to site structures from a storm event in December 2015) are not present, and groundwater quality conditions are suitable for the proposed use and are protective of any down gradient sensitive receptors.

The Auditor considers that the preferred remediation strategy, as outlined in the WSP RAP, is sufficiently robust with appropriate contingencies should contamination be greater than initially identified following the completion of the data gap investigation.



The Auditor concludes that the site is capable of being made suitable for the proposed commercial/industrial development provided that the WSP (27 February 2018) RAP is implemented and the following conditions are met:

1. Groundwater flow direction must be confirmed as part of the proposed additional works.
2. The RAP should be reviewed following the completion of the data gap investigation to confirm it is still appropriate or whether it requires amendment based on the new findings. Any revised RAP should be reviewed by a Site Auditor.
3. Given the shallow groundwater and proximity of ecological receptors, soil validation criteria must be protective of underlying groundwater, such that residual soil conditions do not leach at unacceptable concentrations resulting in groundwater contamination into the future.
4. Any material imported to site must be certified as VENM or ENM (or other materials) as per the requirements of the resource recovery exemptions.
5. Any risk assessment prepared for the site must be provided to the Site Auditor for review and endorsement.
6. For any contamination remaining onsite under a 'cap and containment' strategy, a Long Term Environmental Management Plan (LT EMP) must be required. The EMP will need to be appropriate for the contamination remaining, will need to be made legally enforceable and will require public notification. The LT EMP will require review and endorsement by a Site Auditor.

This interim audit advice does not constitute a SAS or a SAR, but rather is provided to assist the Client in the assessment and management of contamination issues at the site. The information provided herein should not be considered pre-emptive of the final site audit conclusions. It represents the Auditor's opinion based on the review of currently available site information. At the completion of the audit process an SAS and SAR should be prepared to confirm site suitability post remediation and validation works.

Should you have any queries or wish to discuss any points, please do not hesitate to contact the undersigned.

Yours sincerely,

Rebeka Hall
Site Auditor (NSW EPA No.0802)
Zoic Environmental Pty Ltd