

Our reference: EF14/240:DOC16/354065-13:PW
Contact: Paul Wearne (02) 4224 4100

Department of Planning and Environment
(Attention: Fiona Gibson)
GPO Box 39
SYDNEY NSW 2001

Dear Madam

**MP 10_0118 MOD 3 NOTIFICATION OF MODIFICATION TO
EDMONDSON PARK CONCEPT PLAN
REMEDIAL WORKS SECTION 75W MODIFICATION APPLICATION**

I am writing to provide comment on the above modification application received by the Environment Protection Authority (EPA) on 18 July 2016.


On the basis of a review of the information provided, the EPA makes the following observations:

- The modification application applies to a former sewage treatment plant (STP) and two oxidation ponds, which are reported to be formerly designated as Lot 3 of 831152, and now designated as Lot 212 of DP 1186108 (the site) and which are approximately 1.5 to 2 hectares in area.
- The site is located on the northern portion of the Edmondson Park South area and was formerly used as a STP which serviced the Ingleburn Defence Area.
- In 2011 a concept plan for Edmondson Park South rezoned the land for several land uses subject to conditions including the decommissioning of the STP.
- This application applies to decommissioning of the STP, and associated remediation works including the containment of asbestos and lead impacted soil in six subterranean cells on the site, and land farming of microbiologically impacted waste.
- The land currently containing the treatment plant and eastern oxidation pond is currently zoned as E1 Environmental Conservation under the *Liverpool Local Environment Plan 2008* and is proposed to be transformed into a Regional Park and transferred to NSW National Parks and Wildlife Service (NSW Office of Environment and Heritage (OEH) in accordance with a Conservation Agreement (JBA Section 2.3.3).

The EPA has reviewed the information and provides comments in relation to contaminated land management in the attachment to this letter (**Attachment A**). Some recommended conditions of approval are also attached (**Attachment B**). The EPA may have further comments upon receipt and review of any additional information provided.

If you have any questions regarding this matter, please contact Mr Paul Wearne on (02) 4224 4100.

Yours sincerely



18/8/16

PETER BLOEM
Manager Illawarra
Environment Protection Authority

Attachment A - EPA Comments on Contaminated Land Management Issue
Attachment B - EPA Recommended Conditions of Approval

ATTACHMENT A

EPA COMMENTS ON CONTAMINATED LAND MANAGEMENT ISSUES

Site Criteria

- The Remedial Action Plan (JBS&G 2015) states that biological criteria will be derived from “NSW EPA 1997”. Clarification of the guideline on which the criteria is based should be provided (appears to be *Environmental Guidelines: Use and Disposal of Biosolids Products* (NSW EPA 1997).
- JBS&G 2015 (Table 7.7) provides Ecological Based Soil Validation Criteria derived from the National Environment Protection Measures (NEPC 2013). Further justification of the criteria should be undertaken based on site specific pH, Cation Exchange Capacity and soil type at the site. Where the Ecological criterion cannot be appropriately justified then site-specific EILs should be considered for heavy metals [including but not limited to Copper, Nickel Zinc and Chromium (III)] based on the pH, CEC, percentage Clay and Iron levels at the site.
- JBS&G 2015 (Table 7.5) provides Health Based Soil Investigation Criteria, which are an aggregated set of values from several origins and refers to “*Health Screening level HSL-C*” which we assume relate to the NEPC 2013 soil HSLs for vapour intrusion. The guidelines on which the criteria are derived should be referenced in the Table. Further explanation is required to justify the use of the adopted guidelines relative to the proposed site use.
- Ammonia has been reported above criteria in groundwater and surface waters on the site (JBS&G 2013; Section 4.3) however ammonia does not appear to be included in validation criteria. It is recommended that monitoring for all chemicals of concern including ammonia is undertaken in groundwater and surfaces waters during the remediation and as a component of the validation work.

Remedial Action Plan

- JBS&G 2015 contains cross sections for the proposed encapsulation cells 1, 2 3 and 5. Please include the cross sections for cells 4, and 6 or provide explanation as to why these were not included.
- JBS&G 2015 (Section 9.5.1) of the Remedial Action Plan (RAP) describes the dust control that will be undertaken during the remediation of asbestos during excavation and placement within containment cells. The RAP (Section 5.5.2) recommends the use of a licensed contractor for the work together with monitoring of dust, use of mist sprays and asbestos air fibre monitoring be completed in the vicinity of the asbestos works.

Validation and Management

- JBS&G 2015 recommends that a Validation Assessment be prepared and reported at the completion of the remediation works. The EPA agrees with the need for site validation and recommends that the reporting include the proposed construction of containment cells together with full survey and engineering plans, and engineering reports to validate the as built construction of the containment cell.
- JBS&G 2015 (Section 7.5) proposed Validation Criteria to be used at the site but recommends validation of the groundwater is not required. It is recommended that validation of the groundwater and surface waters at the time of completion of the remedial work is further considered due to the potential for the remedial work to disturb soil and generate contaminated leachate.
- JBA 2016 (Section 2.3.1) refers to Site Audit Statements prepared for the site. Site Audit Statements #FM95C #FM95D #FM95E relate to Lot 3 of DP831152, which state that the site can be made suitable for various uses ranging from residential to commercial uses, subject to compliance with the following Environmental Management Plans:
 - a) ERM 2011 *Development Environmental Management Plan – Ingleburn Defence Site (Ref 0113171RP01_Final)*
 - b) ERM 2011 *Long Term Environmental Management Plan – Ingleburn Defence Site Proposed National Park , Nature Reserve, Open Space Areas (Ref 0113181RP12_Final)*

It is recommended that a Part B Site audit statement also be required to be prepared and issued by a site auditor accredited under the *Contaminated Land Management Act 1997* after completion of the validation work to confirm that the site is suitable for the proposed use prior to any transfer of the land.

- JBS&G 2015 (Appendix B) recommends development of a new Environmental Management Plan (EMP) to manage proposed asbestos and lead containment cells. We agree with the consultant's recommendation that a complete and current EMP should be prepared for the site (as defined above) which identifies ongoing requirements and persons responsible for implementing long term management requirements.
- Section 6.1 of the JBA 2016 Report indicated containment cells 1 to 4 would be managed by OEH. The long term management requirements and requirements for ongoing maintenance requirements should be agreed at an early stage in any discussions about the proposed transfer of land.

List of Reports Reviewed

1. JBA 2016 Section 75W Modification Application – Environmental Assessment Report for Edmondson Park Sewage Treatment Plan Decommissioning and Remediation. Report prepared for Urban Growth NSW, July 2016.
2. JBS&G 2013 Environmental and Geotechnical Site Investigation, Sewage Treatment Plant, Former Defence Ingleburn Site, Campbelltown Road, Edmondson Park, NSW. Report prepared for Urban Growth NSW, 13 December 2013, 43008-56443. Report contained as Appendix A of JBA 2016.
3. JBS&G 2015 *Remedial Action Plan, Former Defence Ingleburn Site, Campbelltown Road, Edmondson Park, NSW* prepared for Urban Growth NSW, dated 20 April 2015, 43008-57149 (Rev 1).

ATTACHMENT B

EPA RECOMMENDED CONDITIONS OF APPROVAL

1. The EPA supports the consultant's recommendation that monitoring of dust, use of mist sprays and asbestos air fibre monitoring should be undertaken during the remedial work and that the remedial work involving disturbance and transport of friable asbestos should be undertaken by a licensed contractor.
2. The EPA recommends that monitoring for all chemicals of concern including ammonia is undertaken in groundwater and surface waters during the remediation and as a component of the validation work.
3. The EPA agrees with the JBS&G 2015 recommendation that a validation assessment be prepared and reported at the completion of the remediation works and recommend that the reporting include the proposed construction of containment cells together with full survey and engineering plans, and engineering reports to validate the as built construction of the containment cell.
4. Validation of groundwater and surface water is recommended to be undertaken to enable appropriate consideration of whether validation of groundwater and surface waters is required after the remedial work.
5. A Part B Site audit statement should be required to be prepared and issued by a site auditor accredited under the *Contaminated Land Management Act 1997* after completion of the validation work to confirm that the site is suitable for the proposed use prior to any transfer of the land.
6. The EPA agrees with the consultant's recommendation that a complete and current EMP should be prepared for the site (as defined above) which identifies ongoing requirements and persons responsible for implementing long term management requirements. The long term management requirements and requirements for ongoing maintenance requirements should be agreed at an early stage in any discussions about the proposed transfer of land.

