



JBS&G (51330-105185)

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Robert Fischer
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**Edmondson Park Former STP –Management Strategy Evaluation Process
Remedial Action Plan (RAP)**

Dear Robert,

JBS&G Australia Pty Ltd (JBS&G) has been engaged by UrbanGrowth NSW (UGNSW, the client), via Aver Pty Ltd (Aver) to provide environmental consultancy services associated with the future decommissioning and remediation of the Sewage Treatment Plant (STP) and associated oxidation pond areas, accessed from Campbelltown Road at Edmondson Park, NSW.

Various site investigation activities completed on behalf of Defence and UGNSW have been completed to identify site decommissioning and remedial works requirements such that the site in the future may be transferred to the Office of Environment and Heritage (National Parks) (OEH) as part of the future Edmondson Regional Park. Requirements for remediation of the site have been documented in a site remedial action plan (RAP¹).

In accordance with the requirements of the CLM Act (1997) and relevant EPA guidance in relation to the management of contaminated land, the remedial action plan was required to consider identify potential remedial/management options and undertake a qualitative assessment of the identified options to arrive at a preferred remedial strategy. This options assessment is included in Section 5.2.2. of the RAP. All identified potential options are consistent with the policy and endorsed guidance developed or endorsed by NSW EPA.

The adopted remediation strategy inclusive of the cap and containment strategy allows for:

- Minimisation of exposure risks of both on-site and off-site sensitive human populations to asbestos and biological contaminants in the short and long term via a reduction in the level of disturbance of impacted material, transport of impacted material along public roads, etc.
- Application of the principles of ecologically sustainable development via reducing the:
 - quantity of material required to be removed from the site as waste to an off-site landfill thereby using up valuable space in landfill sites within the Sydney Basin;
 - requirement for importation of fill material to the site from external locations to backfill excavations generated by off-site disposal of impacted material and former STP infrastructure; and
 - number of vehicle movements required for the remediation works via removal of the need to truck contaminated material from site to landfill and trucks movements associated with the importation of material from other locations to the site to reinstate

¹ Remedial Action Plan, Sewage Treatment Plant, former Defence Ingleburn Site, Campbelltown Rd, Edmondson Park, NSW.
JBS&G Australia Pty Ltd, 20 April 2015, Rev 1 (JBS&G 2015)

the excavations. This resolves the requirement for significant truck movements through the Liverpool LGA to a licensed landfill removing local and main road traffic loading and associated vehicle environmental emissions;

- Minimisation of the overall impact to the localised environment of the site via reducing the potential impact of significant truck movements from the STP site through the proposed regional park footprint to reach Campbelltown Rd from which trucks may travel to the landfill.

The proposed capping profile for the site will provide a permanent physical barrier between future site users and the impacted material that will not require on-going monitoring and/or active management. Given the Conservation Agreement arrangement, upon completion of the containment cell works the land will be passed to the National Parks and Wildlife Service (NPWS) for ongoing management as part of the Edmondson Park Regional Park. This provides surety with respect to the enduring presence of a responsible party whom will maintain possession of the site without the possibility of future development for more sensitive uses beyond public open space.

On the basis of the above, the adoption of the cap and containment strategy when compared to plausible remedial/management alternatives is clearly the most appropriate at the site in addition to being lawful and consistent with EPA guidance.

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email jrosner@jbsg.com.au.

Yours sincerely:



Joanne Rosner
Principal Contaminated Land
JBS&G Australia Pty Ltd

Attachments:

(1) Limitations

Attachment 1– Limitations

This advice has been prepared for use by the client who has commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the client and other parties.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by JBS&G, and should not be relied upon by other parties, who should make their own enquires.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements.

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Ground conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.