



TW  
16396  
3 November 2016

Fiona Gibson  
Planner, Modification Assessments  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2000

Dear Fiona,

**MP10\_0118 MOD 3: EDMONDSON PARK SOUTH  
STP DECOMMISSIONING AND REMEDIATION, FURTHER RESPONSE TO SUBMISSIONS**

This further response to submissions is submitted on behalf of UrbanGrowth NSW, in relation to a modification application to approved Concept Plan MP10\_0118 at Edmondson Park South under Section 75W of the *Environmental Planning and Assessment Act 1979*. The modification application (No. 3) seeks approval for the decommissioning and removal of a former Sewage Treatment Plant (STP), and its associated sewage oxidation ponds, and remediation of the site.

An Environmental Assessment Report (EAR) was prepared in support of the modification application, and was notified in accordance with clause 8F(1)(e) of the *Environmental Planning and Assessment Regulation 2000*. A total of 3 submissions were received, and a Response to Submissions was submitted on 12 September 2016 responding to the issues raised in these submissions.

Further submissions were received from the Environment Protection Authority (EPA) and Liverpool City Council, and a response to the issues raised in these further submissions is provided below.

**EPA**

The EPA indicates that it is satisfied with the proposed approach in relation to surface water monitoring, but reiterates its recommendation that undertaking additional rounds of groundwater monitoring during the remediation and later as part of the validation assessment are necessary, to ensure no unacceptable risks are generated by the works. This is due to consideration for potential disturbance to the subsurface and groundwater during remediation works, and the potential for mobilisation chemicals of potential concern (COPC) identified in the RAP, including but not limited to ammonia. The EPA indicates that they would consider any new advice from the Site Auditor on the matter of ammonia.

Rowena Salmon of Ramboll Environ Australia P/L was engaged by UrbanGrowth NSW in 2013 as the Site Auditor for the whole site. The Site Auditor's specific role in this project has included review of the detailed site assessment report and remedial action plan (RAP) developed for the site. It is intended that the Site Auditor will continue to provide technical review services as appropriate during the remediation works and review of the final validation assessment report(s) and long term environmental plan (EMP) for the site such that a final Part A site audit statement can be issued upon project completion.

As requested by the EPA, UrbanGrowth NSW commits to carrying out an additional round of groundwater sampling for COPCs (including ammonia) prior to the commencement of site decommissioning/remediation works. In relation to determining the need for subsequent or ongoing monitoring, the following approach is proposed:

- Results of additional groundwater monitoring to be assessed via comparison with criteria nominated in the RAP. The assessment report will evaluate the potential need for management/remediation of groundwater conditions during remediation and identify requirements for ongoing monitoring. This report will be reviewed by the Site Auditor and the recommendations endorsed prior to the commencement of any works that may disturb groundwater conditions.
- Based on the outcome of the additional groundwater data evaluation, it is suggested that the Site Auditor would be in a position to specify any requirements for additional groundwater monitoring during and following the completion of remediation works. Should it be considered by the Site Auditor that further ongoing groundwater monitoring is required, UrbanGrowth NSW will ensure that the monitoring is undertaken to the satisfaction of the Site Auditor.

It is therefore requested that rather than requiring a specific condition for ongoing groundwater monitoring, that interim advice from the Site Auditor be required with regard to the requirement for ongoing groundwater monitoring prior to the commencement of any works that may result in disturbance of groundwater underlying the site.

## LIVERPOOL CITY COUNCIL

Liverpool City Council has raised concerns in relation to the on-site cap and containment strategy for the contaminated soils. In particular, Council considers that the benefits of this strategy only address short term risks and does not factor long term risks to the human health and environment.

With respect to the long-term risks to human health and the environment of the proposed remediation scheme, the following is noted:

- The use of on-site containment is validated under NSW EPA policy for management of contaminated sites via inclusion in the hierarchy of soil remediation/ management options presented in the NSW EPA (DEC) *Contaminated Sites: Guidelines for the NSW Auditor Scheme* (DEC 2006). The use of in-situ cap and containment for the long term management of contaminated material, including asbestos impacted material, is a mainstream, commonly adopted approach within NSW urban areas, particularly where significant volumes of waste with low levels of contaminants are identified.
- Assessment of identified asbestos contaminated material proposed to be placed within the containment cell at the site has also addressed the potential for other contaminants of concern including heavy metals, petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), organic contaminants, OC pesticides, etc. Based on the assessment results, there are no contaminant concerns within the material apart from the asbestos. As such, there is no potential for migration impacts to groundwater, surface water and/or soil vapour associated with the intended containment plans. Provisions within the RAP for capping of the material and the ongoing management of the park will ensure there is no risk of mass migration of asbestos contaminated material in the long term.
- As per the requirements of the RAP, material encountered during demolition of the STP and draining of the oxidation ponds that is identified as being impacted with organic contaminants (nutrients, biological species) will require on-site treatment and/or off-site disposal. The RAP clearly indicates this material will not be placed within the containment cell should it have the potential to represent a potential long term environmental and/or health risk via migration to groundwater and/or surface water. As such, no further consideration of the potential for long term human health and/or environmental concerns associated with migration of contaminants of this type are necessary.
- The capping requirements as outlined in the RAP will ensure a suitable and durable physical barrier is placed over the containment cell such that there are no long-term risks associated with human exposure to the asbestos impacted material. The portion of the site upon which the containment cell is to be constructed is zoned for conservation purposes and UrbanGrowth NSW will transfer ownership and long term management obligations for the site to the National Parks and Wildlife Service (NPWS). It is noted that the long-term management obligations are

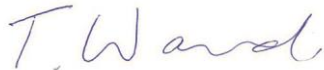
limited to maintenance of the future vegetation cover and the absence of disturbance of material at depth. Given the legislation in place to ensure the long-term protection of the conservation zone and the resources of the NPWS as a government organisation with expertise in management of such zones, the NPWS is considered to be an appropriate organisation to ensure the absence of long term risks in relation to human health and/or the environment.

On this basis, adequate consideration has been given to the potential for short and long term risks to the environment and human health in development of the chosen remedial strategy being the on-site containment of the asbestos impacted material. The adopted strategy is considered to be the most plausible and feasible of the available management alternatives in addition to being lawful and consistent with EPA guidance.

## CONCLUSION

We trust that an appropriate assessment can now be completed by the Department of Planning and Environment for determination under Section 75W of the *Environmental Planning and Assessment Act 1979*. Should you have any queries about this matter, please do not hesitate to contact me on 02 9956 6962 or [tward@jbaurban.com.au](mailto:tward@jbaurban.com.au).

Yours sincerely,

A handwritten signature in blue ink that reads "T. Ward". The signature is written in a cursive, flowing style.

Tim Ward  
Associate