

From: Paul Wearne
Sent: Friday, 28 October 2016 2:59 PM
To: Fiona Gibson
Subject: FW: Seeking Comment - Edmondson Park -management of contamination issues associated with former STP

Hi Fiona,
The following comments relate to the proponents response to contaminated land. Sorry for the delay, give me a call if you would like to discuss
Regards Paul

We have reviewed the JBA letter *MP10_0118 MOD 3: EDMONSON PARK SOUTH STP DECOMMISSIONING AND REMEDIATION RESPONSE TO SUBMISSIONS* (JBA letter to Department of Planning and Environment), with focus on *Attachment A, Response to Submissions, September 2016*.

With reference to Key Issues Summary point #4, the EPA previously recommended 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.

UrbanGrowth NSW responded that

1. Assessment of surface water prior to pond dewatering 'as outlined in the RAP'
2. Assessment of groundwater ammonia conditions did not present an unacceptable risk, which was reviewed and agreed to by an EPA accredited site auditor.
3. If necessary, an additional round of groundwater sampling could be undertaken prior to decommissioning of monitoring wells during demolition works to satisfy the EPA's concerns.

We maintain our recommendation that the undertaking of 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 concern identified in the RAP, including but not limited to ammonia.

With reference to Key Issues Summary point #8, the EPA previously recommended that validation of the groundwater and surface waters at time of completion of the remedial work is further considered due to potential for the remedial work to disturb soil and generate contaminate leachate.

UrbanGrowth NSW responded to confirm that surface water conditions will be monitored prior to and during oxidation pond dewatering activities to ensure compliance with obligations under the POEO Act. UrbanGrowth suggested that additional assessment and validation of groundwater may be required during implementation of the Unexpected Finds Protocol included in the RAP. UrbanGrowth explained this would be further discussed with the site auditor as appropriate.

The proposal to monitor surface waters is considered to be appropriate. The proposal to include groundwater monitoring only in the event of unexpected finds is considered to be insufficient, and we recommend further groundwater monitoring as per our response item #4.

With reference to Key Issues Summary and EPA recommended conditions of approval, point #12 sub point 2), we recommended monitoring for all chemicals of concern including ammonia should be undertaken in groundwater and surface waters during the remediation and as a component of validation work.

UrbanGrowth NSW responded that

1. Requirement for ammonia in surface water assessment is already included in the RAP.
2. The requirement for ammonia in groundwater monitoring was not justified based on existing monitoring data provided to the site auditor.
3. If necessary, an additional round of groundwater sampling could be undertaken prior to decommissioning of monitoring wells during demolition works to satisfy the EPA's concerns, with results to be discussed with the site auditor to confirm existing assessment conclusions in relation to ammonia impact.

From UrbanGrowth's response it appears an EPA accredited site auditor was previously, or is currently engaged to provide site advice. The ongoing engagement of an auditor to oversee the remediation is encouraged.

We maintain that groundwater monitoring for all COPCs is a necessary component of remediation monitoring and site validation purposes and this still is a condition of our approval. However new advice from the site auditor would be considered on the matter of ammonia.

We consider all other items raised by the EPA in our original submission have been adequately addressed.