

23 APRIL 2012

PROPOSED KIAORA LANDS REDEVELOPMENT
AT 1 KIAORA ROAD, DOUBLE BAY NSW 2028

HEALTH REFERRAL COMMENTS
REMEDICATION ACTION PLAN
PROJECT 36280.04-2-REV 01 APRIL 2012
PREPARED BY DOUGLAS PARTNERS
KIAORA LANDS REDEVELOPMENT, DOUBLE BAY
DEVELOPMENT APPLICATION No. 531/2011/1

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REMEDIATION ACTION PLAN

Comments are provided in relation to the Remediation Action Plan prepared by Douglas Partners (Project 36280.04-2-REV 01 April 2012) for Kiaora Lands Redevelopment, Double Bay.

The Remediation Action Plan (RAP) has been revised from the previous version of the RAP (DP reference: 36280.04-2, dated October 2011) to allow for changes to the proposed remediation strategy based on the supplementary contamination assessment (April 2012).

The previous RAP was based on a 'cap and contain strategy'. The identified contamination was to be capped under the proposed slabs/pavements of the development. However, following the supplementary contamination assessment, a revised remediation strategy is preferred wherein the identified contamination will be excavated and disposed off site rather than being capped on site.

Supplementary Contamination Assessment

Given the results of the supplementary assessment and the *95% upper confidence limit (UCL)* of average B(a)P concentrations in the fill (excluding samples BH302/0.2-0.6 and BH305/0.4-0.5), it was considered that remedial works at DP6 and BH106 were not warranted. On the other hand, *given the recorded hot-spot B(a)P and PAH concentrations at sample locations BH302/0.2-0.6 (B(a)p=33.89 mg/kg and PAH=367.92 mg/kg) and BH305/0.4-0.5 (B(a)P=45 mg/kg and PAH=575.6 mg/kg), remedial works in the vicinity of these two bores (BH302 and BH305) was recommended.*

Further, the results of the assessment also showed that the asphalt/road profile in Anderson and Patterson Streets was not suitable for reuse within the proposed commercial/industrial development or for off-site reuse including recycling. However, the subsoils at Anderson and Patterson Streets below the asphalt road profile were considered compatible with a commercial/industrial land use.

Based on the results of Douglas Partners Supplementary Contamination Assessment (April 2012), it was considered that there was a low risk of widespread or significant soil contamination associated with the current site features and current and past site activities. The report, therefore, concluded that the site could be rendered suitable for the proposed development, subject to the following:

- Revision of the existing RAP to address the identified B(a)P contamination in the filling at BH302 and BH305. In view of the proposed development plan, wherein the existing building would be demolished along with minor excavations for geotechnically unsuitable materials, it was considered that the excavation, off-site disposal and subsequent validation of the remedial excavations would be a suitable and practical remediation option;
- Remediation and validation of the site in accordance with the RAP; and
- Preparation of a validation report at the completion of remedial works to demonstrate compliance with the RAP.

Recommendation

1. The areas of soil contamination/materials identified at the Kiaora Lands Redevelopment site following the Supplementary Contamination Assessment undertaken by Douglas Partners (Project: 36280.05 April 2012) are to be excavated and disposed off-site in accordance with the remedial action strategy detailed in the Remediation Action Plan prepared by Douglas Partners (Project: 36280.04-2-Rev 01 April 2012) so that the site is rendered suitable for the proposed commercial land use.
2. A Validation and Monitoring Report must be submitted to the consent authority within 30 days of completing remediation works and prior to the commencement of building construction works pursuant to Clause 18 of SEPP No. 55 – Remediation of Land.

The objectives of the Validation and Monitoring Report are to demonstrate that the objectives stated in the preferred remedial option ('excavation & off-site disposal') of the Remediation Action Plan (DP Project: 36280.04-2-Rev 01 April 2012), including compliance with relevant development consent conditions have been achieved. The Validation and Monitoring Report shall provide a clear statement that the consultant (DP) considers that the subject site to be suitable for the proposed use and detail, if any, all limitations and constraints on the use of the site and recommendation for further work, if appropriate.