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Your ref: HB+B email 20 March 2024

By email
mhoac@hbbproperty.com.au

6 August 2024

Michael Hoac
Assistant Development Manager
HB+B Property Pty Ltd
Level 14, 530 Collins Street, Melbourne VIC 3000

Dear Michael

Contaminated Land Summary - Internal and External Infrastructure and Subdivision Works, Planning Application, Deer Park Estate

HB+B Property Pty Ltd (HB+B) requested WSP Australia Pty Ltd (WSP) to prepare a summary of contaminated land issues to support HB+B's Planning Application for Internal and External Infrastructure and Subdivision Works at the Deer Park Estate.

HB+B has acquired a portion of the Orica Australia Pty Ltd (Orica) Deer Park site and plans to redevelop for a range of warehouse, office and restricted retail uses.

The area acquired by HB+B is shown by the purple dashed line on the inset Figure 1 and is referred to as the 'internal' portion of the site in this letter. This Planning Application also relates to the area of development of Estate Roads 01 and 02 marked by the green dashed line and the drainage basin on the inset Figure 1, referred to as the 'external' portion of the site in this letter. This external area lies within the Orica-owned balance land. Both the internal and external areas are referred to collectively as 'the site' in this letter.

The aim of this summary is to provide Council with an overview of the contaminated land assessment, remediation and Environmental Audits undertaken at the site which have been completed in accordance with Section 53X of the Environment Protection Act 1970 (EPA 1970). The Environmental Audit reports also include the control measures required for ongoing management of residual contaminated land risks which are described in the Site Contamination Management Plan (SCMP) prepared as part of the Statement of Environmental Audit.

Overall, the Deer Park site was divided into 12 Audit Areas. The area acquired by HB+B encompasses portions of the completed Audit Areas 1, 2, 7 and the entirety of 8. The external portion of the site, comprising Estate Roads 01 and 02 linking Ballarat Road to Tilburn Road and providing access into the Development Site, lies within completed Audit Areas 1, 2, 5, 7 and 9. The relevant Environmental Audit Areas are illustrated in Figure 2.

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WSP acknowledges that every project we work on takes place on First Peoples lands.
We recognise Aboriginal and Torres Strait Islander Peoples as the first scientists and engineers and pay our respects to Elders past and present.

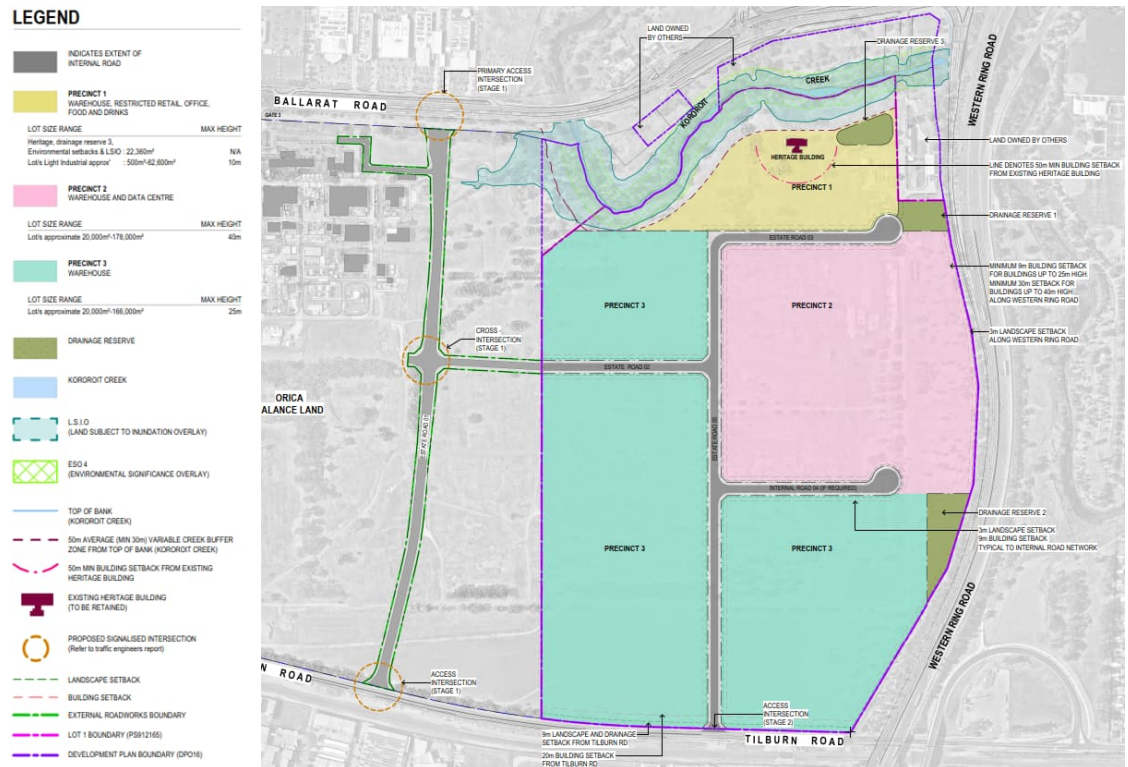


Figure 1 - Proposed Development Plan

In Audit Areas 1 and 8, a total of 16 management areas have been defined by the Environmental Auditor for ongoing management of residual contamination issues in the 'internal' portion of the site. The control measures required for ongoing management of risks to Environmental Values are described in the Site Contamination Management Plan (SCMP) prepared as part of the Statement of Environmental Audit for Audit Areas 1 and 8.

A Statement of Environmental Audit was also prepared by the Environmental Auditor for Areas 2, 5, 7 and 9; however, associated management areas are not required for the 'internal' land acquired by HB+B and the 'external' land owned by Orica where Estate Roads 01 and 02 will be constructed. This is except for a single management area defined in Audit Area 9 where proposed reuse of soil containing PFAS was agreed with the Auditor. This management area was designed to place the PFAS-containing soil beneath Estate Road 01; however, HB+B has advised soil stockpiles containing PFAS were removed from the site by Orica and disposed to landfill in June 2024.



Figure 2 - Environmental Audit Areas

The completed Statement of Environment Audits, associated SCMPs and the assessment reports completed by WSP (and formerly Golder Associates Pty Ltd prior to acquisition by WSP in April 2021) can be downloaded from the EPA Victoria website (<https://www.epa.vic.gov.au/about-epa/publicregisters/environmental-audits>). The six completed Audit Areas relevant of the site are as follows (in the order completed):

- Cardno-LanePiper, Environmental Audit Report and Statement of Environmental Audit, Orica Deer Park, Audit Area 7, CARMS 58853-6, March 2013.
- Cardno, Environmental Audit Report and Statement of Environmental Audit, Orica Deer Park, Audit Area 5, CARMS 58853-8, February 2019.
- Cardno, Environmental Audit Report and Statement of Environmental Audit, Orica Deer Park, Audit Area 2, CARMS 58853-9, September 2020.
- SLR Consulting Australia, Environmental Audit Report and Statement of Environmental Audit, Orica Deer Park, Audit Area 8, CARMS 58853-10, April 2022.
- SLR Consulting Australia, Environmental Audit Report and Statement of Environmental Audit, Orica Deer Park, Audit Area 1, November 2022.
- SLR Consulting Australia, Environmental Audit Report Audit Area 9 – Orica Deer Park, 765 Ballarat Road, Deer Park, Victoria, CARMS 58853-16, October 2023.

The Environmental Audit reports also include supporting information regarding determination of groundwater Clean Up So Far As Reasonably Practicable (CUSFARP) and the preceding Clean Up To the Extent Practicable (CUTEP) for the older Audit Areas, which applied prior to the introduction of the new Environment Protection Act 2017 (EPA 2017). These describe the nature and extent of groundwater contamination at the site and provide details of ongoing management requirements in Groundwater Quality Management Plans (GQMP). The GQMPs for Audits Areas 1, 2 and 8 incorporate monitoring of groundwater bores for a period of time nominated in the GQMPs and as indicated on the inset in Figure 3. In accordance with the SCMPs, access to these groundwater bores must be maintained to enable monitoring. HB+B has advised that an agreement has been prepared with Orica to access the groundwater monitoring bores for ongoing monitoring.

The 16 management areas (14 in Audit Area 1 and two in Audit Area 8 as shown by the light purple polygons on the inset in Figure 3) include control measures to manage residual risks to the following Environmental Values in a commercial/industrial setting:

- Human Health, due to:
 - residual risks posed by soil contamination below the practical limit of excavation at the top of rock;
 - residual risks posed by subsurface vapour;
- Highly Modified Ecosystems, due to residual risks posed by soil contamination at the site;
- Buildings and Structures, due to potential aggressive ground conditions caused by sulphate and pH in the soil profile; and
- Aesthetics, due to areas of discoloured soil and/or the potential for discoloured surface water to pond in excavations.

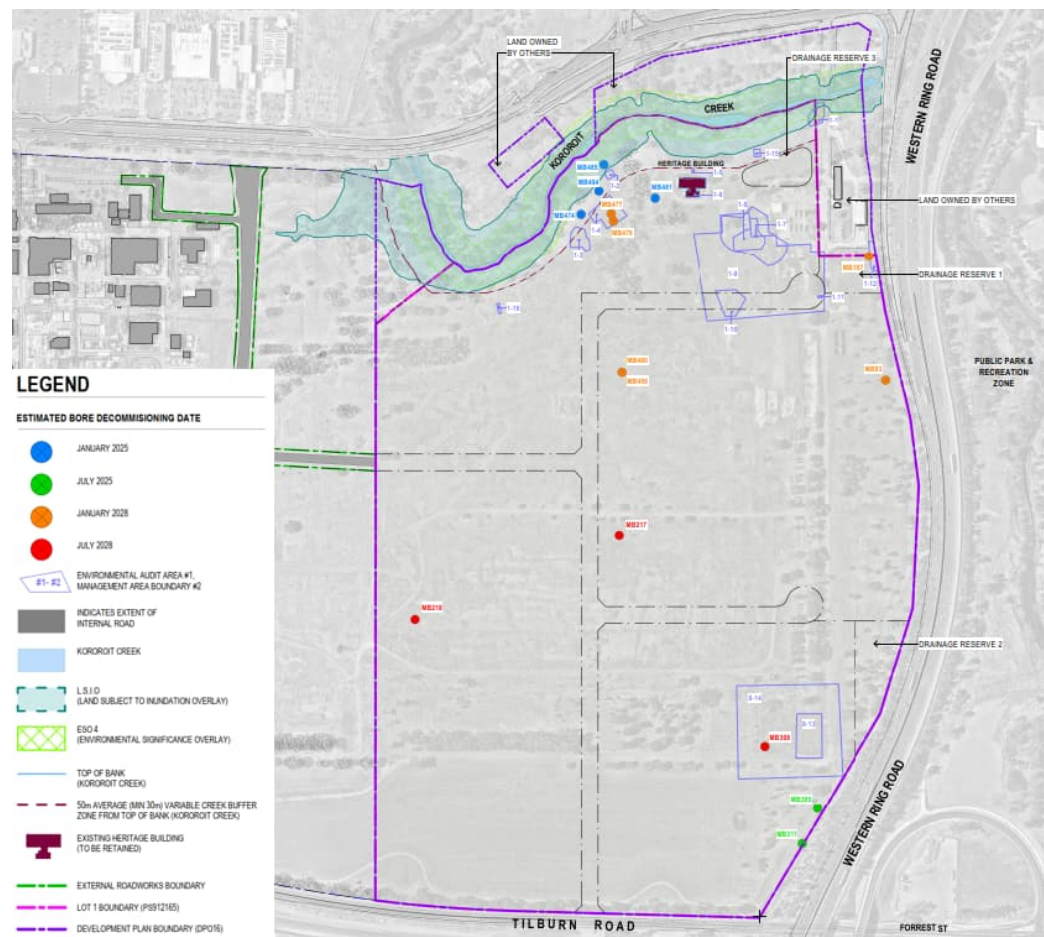
The SCMPs also describe residual risks posed by the potential to:

- encounter asbestos containing material (ACM), noting that all observed ACM was abated; and
- other potentially hazardous materials that were observed and remain on-site, such as protective coatings on underground services.

It is noted by HB+B that redundant gas mains and methanol pipeline has been agreed to be removed by Orica and Coogee who are the owners of the asset.

The earth works planned for the site proposes to include steps to appropriately manage the residual contamination risks within the 16 management areas as defined in the SCMPs, incorporating control measures such as:

- The appointment of a Site Manager responsible for the implementation of the SCMPs;
- The appointment of an Environmental Consultant and Environmental Auditor to provide advice and review as required by the SCMPs;
- The creation of a Construction Health, Safety and Environment Plan to document risk controls and work method statements to manage residual risks to human health and environment from contamination;
- The use of task-specific Soil and Rock Management Plans for each scope of construction or maintenance work in the management areas, so that workers are informed of necessary control measures and work procedures;
- Undertaking vapour intrusion risk assessment and installation of vapour barriers, as required;
- Undertaking explosives risk assessment for excavation below top of rock, as required; and
- Seeking structural engineering advice to protect buildings and structures from potentially aggressive ground conditions, as required.





contamination issues. The planned raising of site levels also assists in reducing potential exposure risks to residual contamination underlying the site.

Your attention is drawn to the attached document - "Limitation Statement". The statements presented in this document are intended to advise you of what your realistic expectations of this report should be. The document is not intended to reduce the level of responsibility accepted by WSP, but rather to ensure that all parties who may rely on this report are aware of the responsibilities each assumes in so doing.

We trust this Environmental Summary for the site meets HB+B's and Council's requirements, however, should you have any queries, please do not hesitate to contact either of the undersigned.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AKalitsis', with a long horizontal flourish extending to the right.

Andrew Kalitsis
Technical Executive

Encl: Statement of Limitations



Limitation Statement

This Report is provided by WSP Australia Pty Limited (WSP) for [insert name of Client] (*Client*) in response to specific instructions from the Client and in accordance with WSP's proposal dated [insert date] and agreement with the Client dated [insert date] (*Agreement*).

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