

Date Prepared: 1 March 2005	Prepared by: Greg O'Brien
Approved by:	Title: Chief Scientific Advisor
Position: Director, Environment - Southern Region (EPA)	Division/Region: Integrated Assessment Branch - Environmental Operations
Date Approved:	Telephone: (07) 3224 4514
	Other Refs: BNE9848
	Track No: E/05/80644

Ref: BNE8343-6
BNE2005/2742
E/05/80644

sch4p4(6) Personal information
sch4p4(6) Personal information 2/3/05

Mr Guyton Giles
Suncoast Car Care Ltd T/A Midas Maroochydore
120 Sugar Road
MAROOCHYDORE QLD 4558

Dear Mr Giles

The Minister has received further advice following receipt of your letter of 11 February 2005 concerning the remediation of contamination originating from the Mobil Service Station located at 116 - 118 Sugar Road, Maroochydore and has asked me to respond on her behalf.

Mobil Australia Pty Ltd (Mobil) conducted a number of contaminated land investigations between December 2000 and July 2002 to determine the extent of petroleum hydrocarbon contaminants from a leaking fuel tank at the service station site into adjacent land. The Environmental Protection Agency (EPA) evaluated the associated reports and, in order to protect the environment from the risks posed by the hydrocarbon contamination, issued a Remediation Notice (the Notice) on 24 October 2002 in accordance with s.391 of the *Environmental Protection Act 1994* (the EPA Act).

The Notice requires that a suitably qualified and experienced contaminated land consultant supervise the remediation works and that environmental protection measures be implemented to manage environmental harm, including nuisance such as odour, dust and noise during the implementation of such works. Mobil engaged the environmental consultants IT Environmental (Australia) Pty Ltd (IT) to undertake the necessary works.

As you may be aware, inground monitoring wells have been installed and interlinked in the affected area including those on the property at 120 Sugar Road of which your associated company Giles and Pitts Pty Ltd is the lessee. The wells are connected to a groundwater and soil vapour extraction plant to draw leaked petroleum hydrocarbon from soil and groundwater for treatment and disposal. Further work will be conducted to intercept and collect contamination on the site of origin and ongoing work is required to monitor the progress of remediation and the extent of the spread of contamination.

s.73 irrelevant information

s.73 irrelevant information The EPA is also aware that the majority of works, conducted on the property of which your company is the lessee, have been undertaken out of business hours. At the

present time the amount of work needed on your site is minor involving groundwater sampling and well adjustments to ensure the efficient operation of the remediation equipment.

In EPA correspondence to you of 18 June 2004 and 15 February 2005, it was advised that the "matters in dispute be separated from the necessity to undertake the cleanup works". It was also advised that, in order to ensure the abatement of environmental risks from the spread of contamination, any interruption of legitimate access to address the requirements of the Notice would not be acceptable. Your company's on-going support for this position is appreciated.

The comments you have made on changes to strengthen voluntary mediation and court actions relating to disputes are noted. However, s.394 of the EP Act provides the necessary process to ensure that, in the event that there is failure to reach agreement with the parties involved, an appropriate court would decide any financial loss incurred because of work conducted by Mobil or their contractors.

The Minister thanks you for bringing this matter to her attention and trusts this information clarifies the situation. Should you have any further enquiries, please contact Mr Greg O'Brien of the EPA on telephone (07) 3224 4514.

Yours sincerely

Ross MacLeod
Senior Policy Advisor
(Environment)

Nick Heath
Policy Advisor
(Environment)

Marcus Toyne
Assistant Policy Advisor
(Environment)

Enquiries to: K Wall
Telephone: (07) 3227 7667
Your reference: J208137E
Our reference: BNE9848

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

EMR updated
29/4/04

sch4p4(6) Personal information

Permit to Remove and Dispose of Contaminated Soil

Pursuant to Section 424 of the *Environment Protection Act* 1994 (EP Act) permission is given to the applicant

Julie McDowell

IT Environmental (Australia) Pty Ltd

PO Box 2320

Fortitude Valley MAC Qld 4006

Telephone: 3252 5711

Fax: 3252 5712

to remove and dispose of soil contaminated with
Hydrocarbons

from 120 Sugar Road, Alexandra Headlands

on Lot 1 on RP176929 and described in the following correspondence:

Application for Soil Disposal Permit dated 20 April 2004 and EPA File BNE9848.

The permit holder is responsible for ensuring that the specific and standard conditions in Schedules 1 and 2 of this permit are complied with by all personnel involved in the excavation, removal and disposal.

Signed

sch4p4(6) Personal information

Kim Barry

Principal Scientific Advisor (Contaminated Land Unit)

R. B. 15/10/04

cc: Ruth Hodson Mobil Engineering Fax: (07) 3213 7909

Notice to Applicant

The conditions on this permit have been decided after consideration of the standard criteria (EP Act) and for the purpose of preventing environmental harm. The applicant may apply for a review or appeal against the decision within 10 business days of receipt of this notice (s521 and s531).

288 Edward Street Brisbane
Queensland 4000 Australia
GPO Box 2771, Brisbane Qld 4001
Telephone (07) 3225 1827
Facsimile (07) 3247 3278
Website www.epa.qld.gov.au
ABN 87 221 158 786

Schedule 1 of 2 – Specific Conditions

The volume or mass of the contaminated soil shall not exceed 40 cubic metres.

The soil is to be disposed in accordance with the disposal facility approval letter dated 20/04/2004 at 500 Lytton Road, Colmslie.

The soil must be disposed between 23/04/2004 and 23/07/2004.

Other Conditions:

Nil

RTI DL RELEASE - EHP

Schedule 2 of 2 – Standard Conditions

1. Volume / mass of contaminated soil

This permit applies to the specified volume or mass only. Any increases to the specified quantity will require a new disposal permit.

2. Disposal time period

Disposal must occur within the dates specified or a new disposal permit must be sought.

3. Excavation and loading

The holder of this disposal permit must take all reasonable precautions necessary to prevent the spillage of contaminated soil during loading and prevent contaminated soil being transported from the site of origin on vehicle tyres and plant and equipment.

4. Transportation

(a) *Transporter to be advised of permit conditions*

Prior to the removal of contaminated soil, the permit holder must provide a copy of the permit and conditions to the transporter.

(b) *Load to be secured*

The contaminated soil must be covered in the transportation vehicle to ensure that the contaminated soil or offensive or noxious gases are not released during transport.

(c) *Cleaning of vehicles and plant equipment*

An effective system must be employed for cleaning of vehicles and plant and equipment which are used to transport or handle contaminated soil which prevents release of contaminants onto any roadway or to any waters or stormwater drainage system.

(d) *Spillage*

Any spillage of contaminants must be cleaned up as quickly as practicable. Spillages must not be cleaned up by hosing, sweeping or otherwise releasing such contaminants or material to any stormwater drainage system, roadside gutter or waters.

5. Receival and disposal

(a) *Licence conditions*

The acceptance and disposal of the contaminated soil must comply with the licence conditions and the specific requirements of the disposal facility.

(b) *Disposal receipts*

Copies of disposal acceptance receipts are to be submitted to the Administering Authority within 10 business days of the date of disposal. The holder of, or person acting under a disposal permit, must comply with the conditions of the permit (s425 of the *Environmental Protection Act 1994*).
Maximum penalty - 100 penalty units.

6. Interim storage

Contaminated soil which is temporarily stored at the site of origin or approved for storage at a separate property must be stockpiled and securely covered and/or managed to ensure that:

- (a) rainwater is drained away from the stockpiles;
- (b) contaminated soil is not transported from the stockpile by wind or rainwater;
- (c) offensive odours or noxious gases are not released; and
- (d) soil underlying the stockpiles is not affected by contamination.

A report is to be provided to the Administering Authority within 28 days of final disposal that verifies that the storage area is fully cleared of contamination.

7. Treatment of soil

(a) Licensed facility

When treatment is to be undertaken at a licensed general waste disposal facility or regulated waste treatment and disposal facility, acceptance receipts must be provided to the Administering Authority within 10 days of contaminated soil delivery. The contamination level in the soil must be reduced to a level agreed by the Administering Authority. When contaminated soil is stored at such facility pending treatment, storage is to be undertaken according to condition 6.

(b) Other treatment sites

(i) Soil remediation and validation report.

The permit holder must provide a report of the soil remediation including chemical test results that validate that the contamination has been lowered to levels agreed with the Administering Authority. The report must provide evidence that the land underlying the treatment activity is not affected by contamination.

(ii) Environmental harm.

Treatment activities must be carried out to ensure that environmental harm is not caused and that contaminants including treatment agents are not released from the site by wind, stormwater or as offensive or noxious gases. The requirements of condition 6 also apply.

(c) Final disposal

When soil contamination has been reduced to levels acceptable to the Administering Authority, the soil may be disposed of as general fill unless otherwise specified in Schedule 1. The location of the final disposal site of the soil is to be identified after treatment by written advice to the Administering Authority.

****End of Document****

Disposal Permit – Application Review

Source Site	Address	(116-118 Sugar Road, Alexandria Headland) 120 Sugar Road, Alex + headland
	File No.	ENE 9848
	Lot + Plan No	Lot 1 on RP176729
	EMR ID	5399 (on CLR)
	Notifiable Activity	NA 34 - Service Station
	CoT	on file.
	Plan/Figure	✓
Contamination	Contaminant	TPH, BTEX compounds, PS+I
	No. Samples	
	Contaminant Concentration	
Disposal Volume:		40-60 m ³
QA/QC - OK:	No	} propose to sample soil once arrived at the Mobil Service } terminate & forward lab results once received.
CoC, Labs - OK:	No	
Treatment/Disposal Site	Address	Lot 8 on RP207901 (114) 500 Lytton Road, Colville
	Acceptance Letter	Ruth Hodson - Mobil Engineering acceptance 40m ³ Soil (20 April 2004)
	Proposed Action (Treatment/ Disposal)	Treatment
	Acceptance Criteria	



IT Environmental (Australia) Pty Ltd

ABN 89 003 931 057

Level 2, 33 Longland Street Newstead QLD 4006

PO Box 2320 Fortitude Valley MAC QLD 4006

Telephone: 61 7 3252 5711

Facsimile: 61 7 3252 5712

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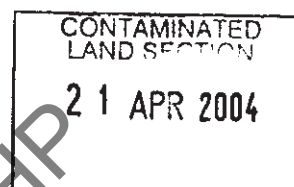
20 April 2004

Reference: J208137E

Contaminated Land Unit
PO Box 2771
Brisbane Qld 4001

Attention: Ms Elissaveth Black

Dear Ms Black



Re: Soil Disposal Permit Application

Please find attached for your review and consideration an application and associated supporting documentation for the disposal of soil that will originate from the installation of a soil/groundwater remediation system at 120 Sugar Road, Maroochydore (Lot 1 on RP176929). Remediation works is to include the installation of an interception trench, which will result in the generation of excess soil cuttings that can not be disposed/stockpiled at the site.

As discussed earlier on the telephone today, the soil to be disposed of off-site is likely to be impacted with phase separated hydrocarbons (PSH) based on the fact that monitoring wells located in the area of proposed excavation contain measurable thicknesses of PSH. The site is currently an operating service station with little to no room to stockpile any excess soil thus we would like to transport the soil to the Mobil Colmslie Terminal for treatment soon after it is excavated. We propose to sample the soil once it arrives at the Mobil Colmslie Terminal and forward the results onto you once received. To provide you with an indication of the level of impact present at the site please find attached soil and groundwater analytical plans.

As we are scheduled to begin excavation works by the end of this week (22-23 April 2004), beginning of next week (27 - 29 April 2004) so your immediate attention would be greatly appreciated. Please do not hesitate to contact the undersigned on (07) 3252 5711 on

sch4p4(6) Personal information if you have any queries in relation to this application.

Yours sincerely

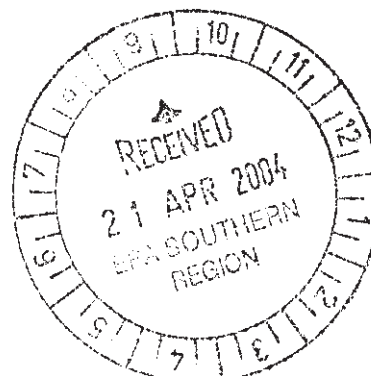
IT ENVIRONMENTAL (AUSTRALIA) PTY LTD

sch4p4(6) Personal information

Julie McDowell
Environmental Engineer
Project Manager

Attachments:

1 x Application for Disposal Permit plus supporting documentation.





Application for Disposal Permit

Section 424 Environmental Protection Act (1994)

Please note: Failure to lodge all required information will result in your application being rejected and returned to you for completion and re-submission.

Important information (please read before completing this form)

A decision on an application will be made within 14 days of receipt, with a further 10 days allowed for preparation of the permit.

Complete the following: (Attach a separate sheet if more space required)

1. Applicant details

(This is the contact person to whom the Disposal Permit will be sent and to whom all enquires will be directed)

Contact name Julie McDonnell Telephone 3252 5711 Fax 3252 5712

Company Name (if applicable) IT ENVIRONMENTAL (AUSTRALIA) P/L

Postal Address PO Box 2320

Fortitude Valley MAC QLD Postcode 4006

2. Details of site(s) from which soil is to be removed

Has a Site Investigation Report been submitted to EPA?

☒ Yes EPA file number BNE 9848
☐ No

Real Property Description (Lot on Registered Plan) Lot 1 on Plan RP176929

Street Address of site (s) 120 Sugar Road Alexandra Headland (Maroochydore)

Copy of current Certificate of Title

☐ Enclosed with this application
☒ Submitted previously to the EPA within a site investigation report

Has the site been used for a Notifiable Activity as per Schedule 2 of the Environmental Protection Act 1994?

☒ Yes (please specify) Operating service station
☐ No

Is the site presently being used for a Notifiable Activity?

☒ Yes (please specify) As above
☐ No

Is the site currently on the Environmental Management Register or Contaminated Land Register?

☒ Yes
☐ No (if no, a notification form must be submitted to EPA)

Has contaminated soil been removed from this site in the past?

☒ Yes (if yes, was an application for off-site disposal sought? ☒ Yes ☐ No)
☐ No

(Permit dated 6/3/03)

3. Approximate volume (in m³) of soil to be removed (allowing for excavation bulking)

40-60 m³

Describe how the volume of soil to be removed was calculated

In situ with a bulking factor applied

4. Dates between which soil will be moved to the disposal location (As per Section 424(7), permits will only be valid between dates stipulated in the disposal permit)

22 April 04 to 28 May 04.

5. Justification of request

Reason(s) why on-site treatment or management not proposed

Operating service station; not enough room available at the site; public access area.

Will validation sampling be undertaken to ensure that contaminated soil is removed?

No. Removed due to installation of a soil/grandwater remediation system. Validation of site will occur at a later date.

6. Description of contamination present in soil to be removed

Contaminants present

PSH, TPH, BTEX compounds

Please enclose with your application:

Samples of soil removed will be collected at soil disposal premises. Results will be forwarded to EPA ASAP.

- TBP ☒ Figure showing the location of soil sampling locations and contamination source(s)
- TBP ☐ Tabulation of soil analysis results
- TBP ☐ TCLP results from relevant soil samples
- TBP ☐ Laboratory reports from relevant soil samples
- ☒ Explanation of location and depths of samples, how samples were collected, and how sample integrity was maintained.

7. Written acceptance from owner of site receiving soil

Is the soil being removed to a local government-administered landfill?

- ☐ Yes ☐ Written acceptance from Council is enclosed
- ☒ No (Please complete Section 8 of this application form).

Name and Address of Local Government administered landfill

8. Description of site receiving soil (complete this section only if soil not going to local government-administered landfill)

Real Property Description (Lot on Registered Plan) Lot 8 on Plan

RP207901

Street Address of site

500 Lytton Road, Colmslie

Local government authority

Brisbane City Council

- ☐ Copy of Certificate of Title (CT) provided
- ☒ Written acceptance from registered owner is enclosed with this application

Release

*Facsimile***Mobil Engineering****Mobil**

To Julie McDowell
IT Environmental

Pages

1 page(s)

Fax 3252 5712

Date 20 April 2004

From Ruth Hodson (3213 7924) cc
3213 7909 (fax)

Re **CONTAMINATED SOIL EX MAROOCHYDORE**

Wish to advise of our acceptance of 40 cubic metres of contaminated soil ex Maroochydores site. Soil is to be transported to Colmslie once EPA approval is in place and consultant's compliance of conditions. Please fax through a copy of the relevant EPA approval once obtained. We would appreciate your confirmation of timing and we will then supply our Transportation of Contaminated Soil docket that must be completed for each load to Colmslie.

It is a safety requirement that PPE (long trousers, long sleeves and safety glasses) be worn by all visitors / drivers on site. Please ensure your contractors comply with these requirements.

RTI DL RELEASED

If this message has been received by other than the party to whom it is addressed, please notify us immediately at the telephone number below. The message may contain material which is proprietary or confidential, and it should not be copied or distributed. Confidentiality is not waived by reason of loss or mistaken delivery. If transmission is incomplete or illegible, please phone 3213 7924.

Mobil Oil Australia Pty Ltd
ABN 88 004 052 984
500 Lytton Road, Morningside QLD 4170
PO Box 575, Brisbane QLD 4001
Telephone: 61 7 3213 7888

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Pages 13 through 16 redacted for the following reasons:

s78B(2) - Publication Prevented by Law
s78B(2) - Publication Prevented by Law

RTI DL RELEASE - EHP

By Fax: 3247 3278



IT Environmental (Australia) Pty Ltd

ABN 89 003 931 057

Level 2, 33 Longland Street Newstead QLD 4006

PO Box 2320 Fortitude Valley MAC QLD 4006

Telephone: 61 7 3252 5711

Facsimile: 61 7 3252 5712

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27 April 2004

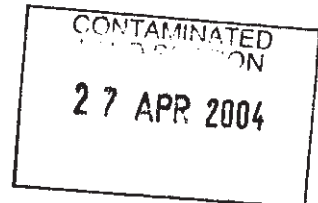
Reference: J208137E

Contaminated Land Unit
PO Box 2771
Brisbane Qld 4001

Attention: Ms Kate Wall

Dear Ms Wall

Re: Soil Disposal Permit Application



Please find attached for your review and consideration an application and associated supporting documentation for the disposal of soil that will originate from the installation of a soil/groundwater remediation system at 120 Sugar Road, Maroochydore (Lot 1 on RP176929). Remediation works is to include the installation of an interception trench, which will result in the generation of excess soil cuttings that can not be disposed/stockpiled at the site.

As with our previous soil disposal application which was subsequently approved on dated 23 April 2004 for this site, the soil to be disposed of off-site is likely to be impacted with phase separated hydrocarbons (PSH) based on the fact that monitoring wells located in the area of proposed excavation contain measurable thicknesses of PSH. The site is currently an operating service station with little to no room to stockpile any excess soil thus we would like to transport the soil to the Mobil Colmslie Terminal for treatment soon after it is excavated. We propose to sample the soil once it arrives at the Mobil Colmslie Terminal and forward the results onto you once received. With our previous soil disposal application, soil and groundwater analytical plans were provided to you to provide an indication of the level of impact present at the site.

We have begun excavation works today and works thus far indicate that we will exceed our existing soil disposal permit volume of 40m³ by the end of today. We would like to continue excavating tomorrow so your immediate attention would be greatly appreciated. Please do not hesitate to contact the undersigned on (07) 3252 5711 or 04 (6) Personal information if you have any queries in relation to this application.

Yours sincerely

IT ENVIRONMENTAL (AUSTRALIA) PTY LTD

sch4p4(6) Personal information

Julie McDowell
Environmental Engineer
Project Manager

Attachments: 1 x Application for Disposal Permit plus supporting documentation.



Application for Disposal Permit

Section 424 Environmental Protection Act (1994)

Please note: Failure to lodge all required information will result in your application being rejected and returned to you for completion and re-submission.

Important information (please read before completing this form)

A decision on an application will be made within 14 days of receipt, with a further 10 days allowed for preparation of the permit.

Complete the following: (Attach a separate sheet if more space required)

1. Applicant details

(This is the contact person to whom the Disposal Permit will be sent and to whom all enquires will be directed)

Contact name Julie McDowell Telephone 32525711 Fax 32525712

Company Name (if applicable) IT ENVIRONMENTAL (AUS) P/L

Postal Address PO Box 2320

Fortitude Valley QLD Postcode

2. Details of site(s) from which soil is to be removed

Has a Site Investigation Report been submitted to EPA?

☒ Yes EPA file number BNE 948
☐ No

Real Property Description (Lot on Registered Plan) Lot 1 on Plan RP 176929

Street Address of site (s) 120 Sugar Road, Alexandra Headland

Copy of current Certificate of Title

☐ Enclosed with this application
☒ Submitted previously to the EPA within a site investigation report

Has the site been used for a Notifiable Activity as per Schedule 2 of the Environmental Protection Act 1994?

☒ Yes (please specify) Operating Service Station
☐ No

Is the site presently being used for a Notifiable Activity?

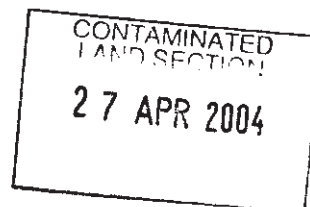
☒ Yes (please specify) as above
☐ No

Is the site currently on the Environmental Management Register or Contaminated Land Register?

☒ Yes
☐ No (if no, a notification form must be submitted to EPA)

Has contaminated soil been removed from this site in the past?

☒ Yes (if yes, was an application for off-site disposal sought? ☒ Yes ☐ No)
☐ No



Permit dated 6/3/03
23/4/04

3. Approximate volume (in m³) of soil to be removed (allowing for excavation bulking)

40m³

Describe how the volume of soil to be removed was calculated

Instn w a bulking

factor applied.

4. Dates between which soil will be moved to the disposal location (As per Section 424(7), permits will only be valid between dates stipulated in the disposal permit)

28/4/04 to 28/5/04

5. Justification of request

Reason(s) why on-site treatment or management not proposed

operating service station;
not enough room available @ the site; public access area

Will validation sampling be undertaken to ensure that contaminated soil is removed?

no. removed
due to installation of a soil/gwater remediation system.
Validation of site will occur @ a later date.

6. Description of contamination present in soil to be removed

Contaminants present

PSH, TPH, BTEX compounds

Please enclose with your application:

- Sample of soil removed will be collected
@ soil disposal premises. Results forwarded
to EPA
ASAP.

TBP

TBP

TBP

TBP

- ☒ Figure showing the location of soil sampling locations and contamination source(s)
- ☐ Tabulation of soil analysis results
- ☐ TCLP results from relevant soil samples
- ☐ Laboratory reports from relevant soil samples
- ☐ Explanation of location and depths of samples, how samples were collected, and how sample integrity was maintained.

7. Written acceptance from owner of site receiving soil

Is the soil being removed to a local government-administered landfill?

☐ Yes

☐ Written acceptance from Council is enclosed

☒ No (Please complete Section 8 of this application form).

Name and Address of Local Government administered landfill

8. Description of site receiving soil (complete this section only if soil not going to local government-administered landfill)

Real Property Description (Lot on Registered Plan)

Lot 8

on Plan

RP 207901

Street Address of site

800 Lytton Road, Colmslie

Local government authority

Boston City Council

☐ Copy of Certificate of Title (CT) provided

☒ Written acceptance from registered owner is enclosed with this application

Facsimile
Supply & Distribution

Mobil

To Julie McDowell
IT Environmental

Pages 1 page(s)

Fax 3252 5712

Date 27 April 2004

From Ruth Hodson

cc

Re **ACCEPTANCE OF CONTAMINATED SOIL EX MAROOCHYDORE**

We wish to advise of our acceptance of an additional 40 cubic metres of contaminated soil ex Maroochydore site. Soil is to be transported to Colmslie land farm area in accordance with EPA approval. Please fax through copy of EPA approval for this additional soil.

If this message has been received by other than the party to whom it is addressed, please notify us immediately at the telephone number below. The message may contain material which is proprietary or confidential, and it should not be copied or distributed. Confidentiality is not waived by reason of loss or mistaken delivery. If transmission is incomplete or illegible, please phone 3213 7824.

Mobil Oil Australia Pty Ltd
ABN 88 004 052 884
500 Lydon Road, Morningside QLD 4170
PO Box 575, Brisbane QLD 4001
Telephone: 61 7 3213 7888

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SEND REPORT

27-APR-2004 TUE 14:36

FOR: CONTAM LAND UNIT - EPA

07 32473278

NO.	DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	MNO.	DP
* 01	23-APR	10:23	055921222	30"	1	SEND	OK	575	*
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* 11		14:02	032046577	31"	2	SEND	OK	585	*
* 12		14:10	055414137	21"	1	SEND	OK	586	*
* 13		14:12	054244099	29"	1	SEND	OK	589	*
* 14		14:13	055414137	32"	2	SEND	OK	588	*
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RECEIVE REPORT

27-APR-2004 TUE 14:36

FOR: CONTAM LAND UNIT - EPA

07 32473278

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04		14:00	61 7 3891 6373	1' 55"	4	RECEIVE	OK	
05		14:38		25"	1	RECEIVE	OK	
06		14:49		44"	2	RECEIVE	OK	
07		15:08		24"	1	RECEIVE	OK	
08		16:02	61 7 3255 0877	7' 05"	12	RECEIVE	OK	
09		16:14	07 3281 9454	4' 59"	12	RECEIVE	OK	
10		16:21	61 7 3255 0877	49"	1	RECEIVE	OK	
11	27-APR	12:49	32471195	1' 19"	2	RECEIVE	OK	
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13		14:22	61 7 33163333	59"	2	RECEIVE	OK	

TOTAL: 24' 07" 51

GRAND TOTAL TIME: 199H 13M 9S PAGES: 26380

Porter Davies LAWYERS

Your Reference

Our Reference

Contact

JBP:0000415

John Porter 30234701

26 March 2004

Mr G O'Brien
Chief Scientific Adviser Contaminated Land
Environmental Protection Authority
160 Ann Street
BRISBANE QLD 4000

By facsimile - (07) 3247-3278

Dear Sir

ENVIRONMENTAL MANAGEMENT REGISTER (EMR) LISTING LOT 7, RP548505 SUGAR ROAD, ALEXANDRA HEADLANDS

As you know we act for Mobil Oil Australia Pty Ltd.

For some considerable time we have been endeavouring to negotiate access to the above property (owned by Brenhaven Pty Ltd) but for reasons best known to the registered proprietor its representatives were unhappy with the site access agreement tendered to them and refused to sign it (notwithstanding the fact that there is a commonality of directors between Brenhaven Pty Ltd and the company that owns the adjacent service station site.)

At or about the same time as you sent them a letter dated 11 March 2004 enclosing a notice of consideration listing the above land on the Environmental Management Register the attitude of their representative (Mr. John Lopes) underwent a dramatic metamorphosis and after several less-than amicable exchanges we have procured the execution of a site access and works agreement on terms that facilitate unfettered access by IT Environmental (Australia) Pty Ltd to the land for the purpose of carrying out the remediation action plan.

We have spoken to Tracy Berger and informed her that we now hold a signed access and works agreement and Ms. Burger is now proceeding to marshal the necessary contractors to be on site in the next week.

Presumably Ms Burger will separately report to you when the necessary work to the adjacent property has been carried out.

Mr Lopes has expressed very real concern at the prospect of the property owned by Brenhaven Pty Ltd being listed in the Environmental Management Register.

He has requested that we communicate with you and inform you that access has now been granted on terms acceptable to Mobil and the necessary work on the adjacent property in terms of the remediation action plan will now be carried out.

W:\prod\M00000415\0082189.doc

- 2 -

He has also asked that we request that the land not now be listed in the Environmental Management Register.

Seemingly he has negotiated a sale of it and the purchasers expressed some real concern at the impasse that existed in relation to the carrying out of remediation works.

We have separately communicated with the solicitors for the purchaser (at the request of Mr Lopes) and given them the necessary assurances that the work will now proceed.

Could you please confirm that the land will not now be listed in the Environmental Management Register.

We thank you for your intervention in the matter which has clearly produced the desired result.

Yours faithfully

sch4p4(6) Personal information

John B Porter
PORTER DAVIES

RTI DL RELEASE - EHP



Queensland
Government

Enquiries Greg O'Brien
Telephone (07) 32244514
Your reference
Our reference BNE9848

COPY

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

11 March 2004

Brenhaven Pty Ltd
PO Box 196
Wantirna Vic 3152

File note
373 Listing Notice
issued 11/3/04

sch4p4(6) Personal information

Dear Sir/Madam

**ENVIRONMENTAL MANAGEMENT REGISTER (EMR) LISTING
L7 RP 848505, SUGAR ROAD ALEXANDRA HEADLANDS**

Attached is a Notice under Section 373 of the Queensland *Environmental Protection Act 1994* (EP Act) to list the above site on the EMR as being affected by a hazardous contaminant, namely petroleum hydrocarbons.

In October 2002, a Remediation Notice under Section 391 of the EP Act was issued by the Environmental Protection Agency (EPA) to Mobil Oil Australia Pty Ltd for contamination of land, namely Lots 1 and 2 on RP176929 adjacent to your property, with petroleum hydrocarbons. Fuel had leaked from underground fuel storage tanks on Lot 1 RP176929 contaminating soil and associated groundwater. Part of that Notice required that investigations be conducted to delineate the extent of the petroleum hydrocarbon plume and soil contamination and rectify all contamination.

In the course of this work, Mobil's environmental consultant IT Environmental placed three groundwater monitoring wells (MW27, MW28, MW29) on L7 RP 848505. These wells were monitored in February 2003 and, while MW28 and MW29 were free of contamination, it was found that MW 27 had a significant level of dissolved hydrocarbons. Consequently, it was considered prudent that the site remediation program be adjusted to draw any potential contamination from this area to ensure an improved capture of the contaminant plume.

Since this monitoring event, site remediation has not progressed satisfactorily mainly due to difficulties in obtaining owner consents for site access to conduct the necessary remediation works. Considering the period of time that has elapsed, the potential for migration of the significant plume of contamination from adjacent properties, the porosity of local underlying strata and the results of the monitoring event in 2003, the EPA has a reasonable belief that L7 RP848505 is affected by a hazardous contaminant. Consequently the EPA is considering listing the site on EMR as required under the provisions of the EP Act.

Page 1 of 2

Owner
John Loke

sch4p4(6) Personal information

The attached Notice indicates that submissions on the proposed listing may be made to the EPA up to 22 business days after the Notice is given.

Please contact the undersigned (telephone 07 32244514) should you require any additional information or assistance on this issue.

Yours sincerely

sch404(6) Personal information

Greg O'Brien
Chief Scientific Advisor Environmental Operations

RTI DL RELEASE - EHP

Fax



Queensland Government
Environmental Protection Agency
Incorporating the
Queensland Parks and Wildlife Service

To:	AnneMarie Lewis	Fax:	32473278
From:	Greg O'Brien, Environmental Operations		
Telephone:	(07) 32244514	Fax:	(07) 32277 677
E-mail:	Greg.O'Brien@epa.qld.gov.au		
Date:	11 March 2004	Pages:	1 (including this page)
Subject:	Section 373 Notice		
Reference:	BNE9848, L7 RP848505		

Anne

Please prepare a s373 Notice for hazardous contaminant, being petroleum hydrocarbons for the above site. Groundwater sampling on this site has revealed high levels of dissolved MAH and proposed remediation works to draw any contaminant plume back from this area into a dedicated remediation system on an adjacent lot (subject of a remediation Notice) have been delayed. I will prepare a cover letter to the owner for attachment to the Notice. Please arrange for the Notice and cover letter to be forwarded by certified mail.

sch4p4(6) Personal information

Greg O'Brien
Chief Scientific Advisor, Environmental Operations

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Level 2, 33 Longland Street
Newstead QLD 4006
Tel: (07) 3252 5711
Fax: (07) 3252 5712
Email: tberger@itenviro.com.au

www.itenviro.com.au



FACSIMILE

To:	Greg O'Brien, EPA	Fax No.:	3227 7677
cc:	Sean Mulcair, Mobil Mack Dreyer, URS John Porter, Porter Davies	Fax No.:	(03) 9252 3266 3243 2111 3319 6771
From:	Tracy Berger		
Date:	10 March 2004	Page 1 of:	2

Re: Status Report - Remediation of Former Mobil Maroochydore Service Station and Adjacent Site, Lots 1 & 2 on RP176929, EPA File No.BNE9848

Dear Greg

On behalf of Mobil Oil Australia Pty Ltd (Mobil), IT Environmental (Australia) Pty Ltd (IT) has prepared this status report summarising activities carried out to date in accordance with the EPA's Remediation Notice for the above referenced site.

IT submitted a Remediation Action Plan (RAP) to the EPA on 11 November 2002 (our ref: J208137B-R01), as required by their 24 October 2002 Remediation Notice. One of the requirements of the Remediation Notice was regular reporting to the EPA on the progress of remediation works.

Works completed since our last status report (3 December 2003) are summarised below.

IT returned to the site the last week in January 2004. Since that time we completed the following tasks related to installation of the remediation system.

- Installed electrical, sewer and service piping beneath treatment compound slab.
- Poured concrete for treatment slab.
- Constructed treatment slab wall.
- Constructed treatment slab bunding.
- Installed service pipework to wells adjacent to Sugar Road on NE side of site.
- Completed concrete cutting throughout service station site.
- Delivered treatment container to site and positioned on treatment slab.
- Assembled select sections of pipework within treatment container.
- Commenced trenching and pipework within Stegbar tenancy (Lot 7 on RP848505).

Mr. John Lopes is the current owner of the Stegbar site, although we understand he is in the process of selling the site. Mr. Lopes was informed in writing of our proposed works via our letter dated 16 June 2003, which included a description of the works planned, and a drawing showing the trenching and pipework required to connect well MW27 to our remediation system. After receiving our 16 June

Ref: J208137B-SR10.doc

Page 1 of 2

letter Mr. Lopes' rang IT and spoke to Tracy Berger about the proposed works. No further correspondence was received from Mr. Lopes regarding the matter. Despite being provided with this letter and previously signing a Mobil Access Agreement, Mr. Lopes arrived onsite on 25 February 2004 and demanded we stop work, remove all pipework and reinstate all trenches. IT complied with Mr. Lopes' demands.

At that time we withdrew from all works at the site and asked for re-confirmation by Mobil's legal advisers that all neighbouring properties have agreed to allow IT onsite to complete the necessary works. Confirmation has been provided by all parties except Mr. Lopes. We understand Mobil's legal representative is working with Mr. Lopes' solicitor in this regard.

The delay caused by Mr. Lopes will in turn cause a delay in our commissioning of the remediation system. At this time it is difficult to quantify the length of the delay, but assuming we were able to return to the site on Monday 22 March, we would anticipate the system being up and running by mid-April.

IT is aware that the Third Party Reviewer and possibly yourself wish to be onsite during excavation of the interception trench. We will keep Mack Dreyer apprised of the likely date for this work to be completed.

Our next progress report will be delivered to the EPA on or before 15 April 2004.
In the meantime, should you have any questions about this project, please contact the undersigned on (07) 3252 5711.

Yours sincerely

IT ENVIRONMENTAL (AUSTRALIA) PTY LTD

Tracy Berger
State Manager, QLD/NT

Julie McDowell
Mobil Project Manager

Level 2, 33 Longland Street
Newstead QLD 4006
Tel: (07) 3252 5711
Fax: (07) 3252 5712
Email: tberger@itenviro.com.au

www.itenviro.com.au



FACSIMILE

To:	Greg O'Brien, EPA	Fax No.:	3227 7677
cc:	Sean Mulcair, Mobil Mack Dreyer, URS John Porter, Porter Davies	Fax No.:	(03) 9252 3266 3243 2111 3319 6771
From:	Tracy Berger		
Date:	3 December 2003	Page 1 of:	2

Re: Status Report - Remediation of Former Mobil Maroochydore Service Station and Adjacent Site, Lots 1 & 2 on RP176929, EPA File No.BNE9848

Dear Greg

On behalf of Mobil Oil Australia Pty Ltd (Mobil), IT Environmental (Australia) Pty Ltd (IT) has prepared this status report summarising activities carried out to date in accordance with the EPA's Remediation Notice for the above referenced site.

IT submitted a Remediation Action Plan (RAP) to the EPA on 11 November 2002 (our ref: J208137B-R01), as required by their 24 October 2002 Remediation Notice. One of the requirements of the Remediation Notice was regular reporting to the EPA on the progress of remediation works.

Works completed since our last status report (6 August 2003) are summarised below.

- On Monday 1 December 2003, IT was provided with a formal notification from Mobil that a site access agreement had been signed by Mr. Dennis Ryan and executed by Mobil's lawyers.
- On the basis of the above notification, IT is proceeding with scheduling of system installation and commissioning works and reconfirming site access with adjacent properties. We anticipate that system installation will commence in late January, based on subcontractor availability (still awaiting confirmations from some). A revised schedule is provided for your review.
- We are also proceeding with relevant permitting for the system; however some permits will be contingent upon results received from trials of the system during commissioning (e.g., for treated water discharge, etc.) and so will not be finalised until the system is commissioned.

Our next progress report will be delivered to the EPA on or before 3 January 2004.

In the meantime, should you have any questions about this project, please contact the undersigned on (07) 3252 5711.

Yours sincerely

IT ENVIRONMENTAL (AUSTRALIA) PTY LTD

Ref: J208137B-SR09.doc

Page 1 of 2



IT Environmental (Australia) Pty Ltd
ABN: 89 003 931 057

Tracy Berger
State Manager, QLD/NT

Julie McDowell
Mobil Project Manager

RTI DL RELEASE - EHP

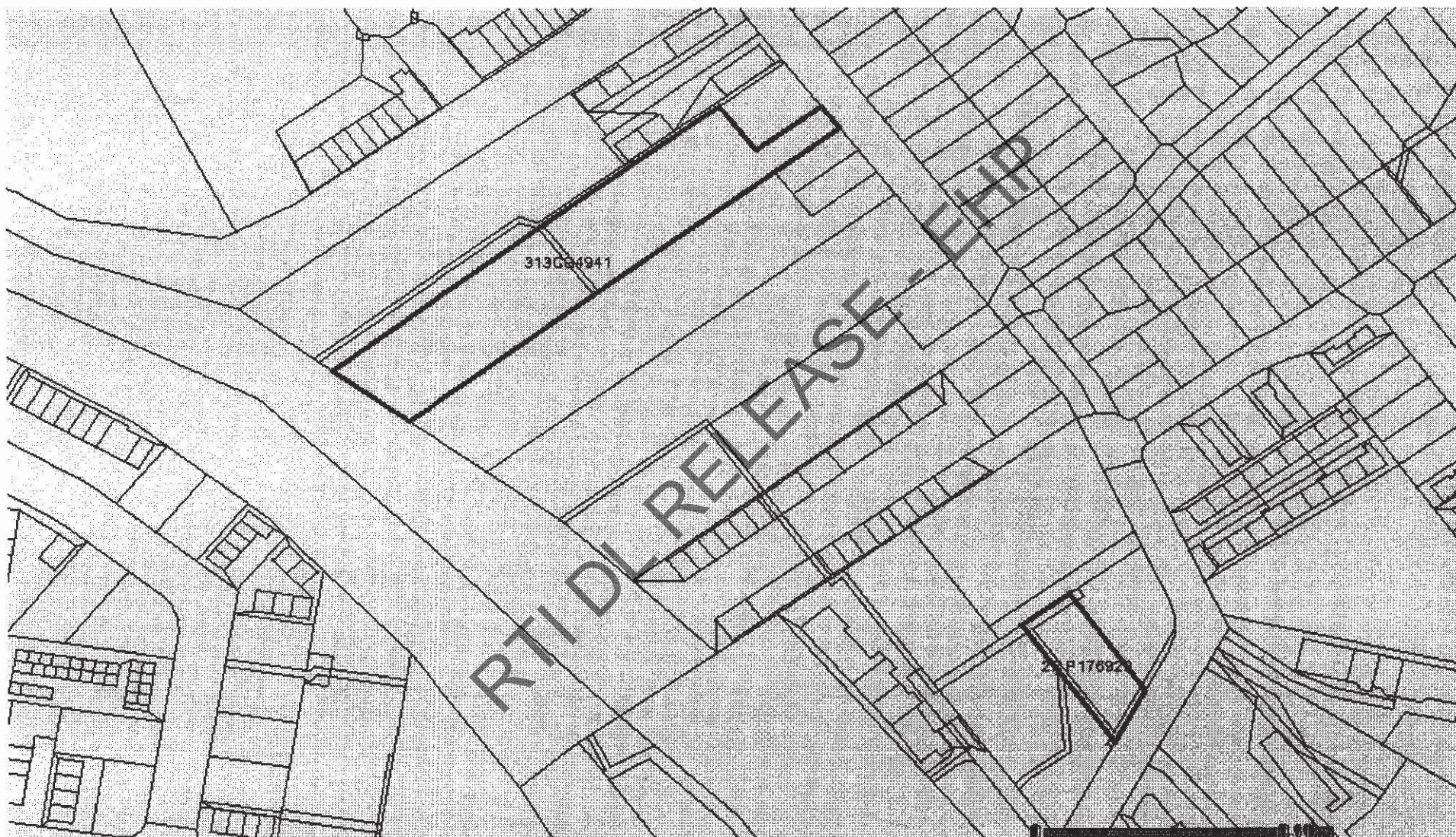
ecomaps

11/03/2008

Queensland Environmental Protection Agency

ecomaps Screen Plot

Page 1 of 2



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**Fax Transmission**

Date: 27 February 2008
To: Environmental Protection Agency
Attention: Angelina Bismark
Facsimile: 3247 3278
No of Pages: 2
From: Donnie Harris
Email: dharris@RNMCK.com.au

CORRO. ID
FILE NO.
FILE LOCATION

ROBERTS
NEHMER
MCKEE
LAWYERS

A LEVEL 1/111
CHARTERS TOWERS RD
TOWNSVILLE QLD 4810

PO BOX 5374
TOWNSVILLE QLD 4810

P 07 4726 5000
F 07 4726 5005

E admin@RNMCK.com.au
ABN 44 353 983 960

MESSAGE

BEMEROO HOLDINGS PTY LTD PURCHASE FROM 4p4(6) Personal information
PROPERTY: 120 SUGAR ROAD, ALEXANDRA HEADLAND

Correspondence attached.

Send in Mail? ☐ Yes ☒ No **Matter number: 070684**

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Partners:

Philip Askin LL.B
 Tim McKee OAM LL.B
 Rohan Armstrong LL.B (Hons)
 Acc.Spec (Pers Inj.)
 Trevor Cowling
 Kerrie Dixon LL.B
 Acc.Spec.(Fam)
 Malcolm Fisher LL.B (Hons)

Special Counsel:

Bernie Messer LL.B

Consultants:

Peter Roberts Notary Public
 Graham Roberts OAM
 Jo-Anne Fitchett LL.B

Senior Associates:

Keta Roseby B.Com
 LL.B (Hons)
 Rosemary Norgate B.A LL.B
 Donnie Harris LL.B (Hons)

Associates:

Wendy Munson LL.B (Hons)
 Naomi Alison B.A LL.B (Hons)



Lot 2 Plan RP176929 Category CONTAMINATED Record Type BP ID 40426 Hist ID

LGA MAROOCHY SHIRE COUNCIL

Region S AMA

Site Name HAZARDOUS CONTAMINANT

Notified By CONSULTANT

Notif Rec'd 04/08/2002

Street 120 SUGAR ROAD

Entry Date 08/10/2002

Last Altered Date

Suburb ALEXANDRA HEADLAND

Post code 4572

Ext Ref

Owner

Owner

Address

sch4p4(6) Personal information

Haz Cont Free phase petroleum hydrocarbons including benzene in soil and associated groundwater.

Post code 4575

Parcel Status C

Area 2064 m²

File BNE9848

Officer

Offsite Disposal Date

Notifiable Activities

HAZARDOUS CONTAMINANT

Comments

Registered Site ID 40426

Date	User ID	Corr N	Officer Name	Finalised	How Finalised
08/10/2002	DOBINST				

NOTIFIED AS PART OF SITE INVESTIGATION FOR L1/RP176929 (I.D.: 5399) AND L2/RP176929. STUDIES AS FOLLOWS:
 ** 1 ** ENVIRONMENTAL SITE ASSESSMENT, MOBIL SERVICE STATION, 120 SUGAR ROAD MAROOCHYDORE QLD, PREPARED BY HANDEX AUSTRALIA PTY LTD, DATED 2 FEBRUARY 2001. ** 2 ** ADDITIONAL WELL INSTALLATION, FORMER MOBIL SERVICE STATION, 120 SUGAR ROAD MAROOCHYDORE QLD, PREPARED BY HANDEX AUSTRALIA PTY LTD, DATED 20 DECEMBER 2001. ** 3 ** MULTI-PHASE EXTRACTION PROGRAM SUMMARY REPORT, FORMER MOBIL SERVICE STATION, 120 SUGAR ROAD MAROOCHYDORE QLD, PREPARED BY HANDEX AUSTRALIA PTY LTD, DATED 13 FEBRUARY 2002. ** 4 ** ADDITIONAL WELL INSTALLATION, FORMER MOBIL SERVICE STATION, 120 SUGAR ROAD MAROOCHYDORE QLD, PREPARED BY HANDEX AUSTRALIA PTY LTD, DATED 19 JULY 2002. FILE NOTE FROM GREG O'BRIEN DATED 8/10/02 RECOMMENDS ENTRY OF THIS SITE ONTO THE CLR - SITE IS AFFECTED BY FREE PHASE PETROLEUM HYDROCARBONS INCLUDING BENZENE IN SOIL AND GROUNDWATER. THE SITE IN ITS CURRENT STATE PRESENTS A RISK OF SERIOUS ENVIRONMENTAL HARM AND HARM TO HUMAN HEALTH THROUGH EXPOSURE TO HYDROCARBON CONTAMINATION. L1/RP176929 (I.D.: 5399) ALSO REFERS. ALL PAPERWORK FOR THIS SITE WITH GREG O'BRIEN.

Mobil Oil Australia Pty Ltd
ABN 88 004 052 984

Colmslie Terminal
500 Lytton Road
Morningside Qld 4170
PO Box 575
Brisbane QLD 4001
Telephone: (07) 3213 7888

15 FEB 2005 / 2455

Mobil

24 February 2005

Kym Barry
Environmental Protection Agency
GPO Box 2771
BRISBANE QLD 4001

Dear Kym

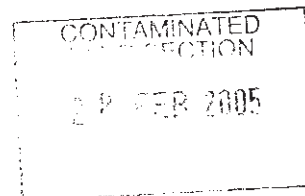
**CONTAMINATED SOIL FROM MOBIL MAROOCHYDORE (ALEXANDRA HEADLANDS)
YOUR REFERENCE BNE9848**

As per conditions stated in permit, please find enclosed Statutory Declaration and Validation Report for soil removed from Mobil Maroochydore, Sugar Road, Maroochydore, Qld 4558.

Yours faithfully

sch4p4(6) Personal information

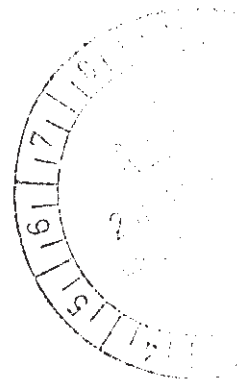
Ruth Hodson
Administration Assistant



cc

Julie McDowell

IT Environmental (Australia) Pty Ltd



STATUTORY DECLARATION

(REPORT PREPARER)

Address of Site Investigated: 2/506-4 Lytton Road, Morningside, Brisbane, QLD....
Real Property Description: Lot 8 on Registered Plan 207901, Parish of Bulimba, County of Stanely.....
Title of Report(s): Stockpile Validation Report - Colmslie Landfarm Area (3 December 2004).....

I, Willy Van Vaerenbergh of URS Australia Pty Ltd, Level 14, 240 Queens Street, Brisbane, in the State of Queensland, do solemnly and sincerely declare that;

- I was the report preparer of the report described above;

I am a member of Environmental Institute of Australia and my qualifications and experience are relevant to this investigation and have been previously submitted to the EPA,

- I have not knowingly included any false, misleading or incomplete information in the report;
- I have not knowingly failed to reveal any relevant information or document to the administering authority; and

I certify that:

- The field investigation activities were performed by Paul Wybrew under the direction of Robert Storrs;
- The report addresses the relevant matters for the investigation and is factually correct; and
- The opinions expressed in it are honestly and reasonably held.

And I make this solemn declaration conscientiously believing the same to be true and by virtue of the provisions of the *Oaths Act 1867*

sch4p4(6) Personal information

Signature

Name

Willy Van Vaerenbergh

Taken and Declared before me at Brisbane this 10th day of December 2004

Witness (Justice of the Peace/Commissioner for Declarations)

Signature

sch4p4(6) Personal information

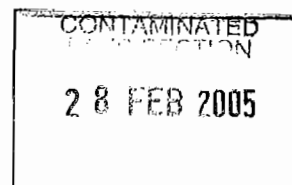
Name (& JP Number if applicable)

VICKI JEANETTE WATKIN

7 December 2004
Project No. 51556-TBA-559

Mobil Australia Pty Ltd
500 Lytton Road
Colmslie QLD 4170

Attention: Ruth Hodson
Mobil Colmslie Administration



Dear Ruth,

Subject: Stockpile Validation Report – Colmslie Landfarm Area

1. Introduction

URS Australia Pty Ltd (URS) was commissioned by Mobil Oil Australia Pty Ltd (Mobil) to undertake validation sampling of the soil originating from Mobil's Service Station (MSS) Alexander Headlands and stockpiled at Mobil's landfarm area at the Colmslie Fuel Terminal, located on the corner of Lytton Road and Colmslie Road, in Colmslie, Brisbane.

Bioremediation of the stockpiled material was undertaken through landfarming, including the regular turning of the stockpiles to aerate the soil.

As indicated on **Figure 1**, there is currently one stockpile of soil originating from MSS Alexander Headlands. Details of the stockpile, including calculated volume, number of samples collected and analysed, and summary of analysis results are presented in **Table 1**.

The results of the stockpile validation sampling indicates that the soil from the stockpile can be considered as "clean" (meets QLD EPA TPH guidelines) and as suitable for off-site use as fill material.

2. Stockpile Validation Sampling

2.1 Sampling Methodology

Validation sampling of the stockpile was undertaken on 23 September 2004. The samples were obtained from the centre of the stockpile using a hand auger and disposable latex gloves.

URS Australia Pty Ltd (ABN 46 000 691 690)
Level 14, 240 Queen Street
Brisbane, QLD 4000 Australia
GPO Box 302, Queensland 4001
Tel: 61 7 3243 2111
Fax: 61 7 3243 2199



Ruth Hodson
Mobil Australia Pty Ltd
7 December 2004
Page 2

Soil samples were properly preserved in 150 ml laboratory supplied glass jars with teflon lined lids, and immediately placed in cool boxes with ice bricks to keep the temperature below 4°C during sample storage and transport to the laboratory.

All primary and duplicate QA/QC samples were sent to Australian Laboratory Services Limited (ALS), an analytical laboratory in Brisbane that is NATA-accredited for the required analyses, with appropriate Chain of Custody documentation. Chain of Custody and Sample Receipt Advice documentation, laboratory certificates of analysis and the laboratory quality control reports are attached in **Appendix A**. The samples were received by ALS within the recommended holding times for the requested analyses.

The triplicate QA/QC sample was sent to AMDEL, an analytical laboratory in Cardiff, Newcastle that is NATA-accredited for the required analysis, with an appropriate Chain of Custody documentation. Chain of Custody and Sample Receipt Advice documentation, laboratory certificates of analysis and the laboratory quality control reports are attached in **Appendix B**. The sample was received by AMDEL within the recommended holding times for the requested analyses.

For equipment that came into contact with the soil (ie. hand auger) the decontamination process consisted of washing with a phosphate free detergent (Decon 90) and rinsing with potable water.

2.2 Validation Sample Analysis Results

The analysis results of the stockpile validation samples are presented in the attached **Analytical Results Tables** section, and are summarised in **Table 1**.

The results indicate the following:

- Concentrations of Total Petroleum Hydrocarbons (TPH) fractions in analysed samples are below the laboratory detection limit and below the Queensland EPA's draft Environmental Investigations levels.
- Concentrations of BTEX compounds in analysed samples are below the laboratory detection limit and below the Queensland EPA's draft Environmental Investigations levels.

Table 1
Stockpile Validation Sample Analysis Results

Stockpile ID	Approximate Volume (m ³)	Number of Samples Analysed	Pass / Fail
SP01	105	3	Pass

2.3 Data Validation

On the basis of the analytical data validation procedure employed, the overall quality of the analytical data produced is considered to be of an acceptable standard for interpretive use. The following points summarise the findings of the data quality review, as presented in **Appendix C**:

- Field Sampling Procedures

All field samples were collected in accordance with standard URS field sampling procedures. The sampling methods employed are considered sufficient in order to meet the data quality objectives of this investigation.

- Sample Preservation and Handling.

All field samples were handled and preserved in accordance with standard URS quality procedures. All sample handling and preservation methods employed are considered sufficient to meet the data quality objectives of this investigation.

- Sample Holding Times

All field samples were tested within acceptable holding times for the relevant analyses requested.

- Rinsate Blank Results

Concentrations in rinsate blank samples were below the detection limits.

- Field Blank Results

Concentrations in field blank samples were below the detection limits.

- Laboratory Blank Results.

Ruth Hodson
Mobil Australia Pty Ltd
7 December 2004
Page 4

All laboratory blanks returned results that were below the relevant laboratory limits of reporting for the analytes tested.

- Field Duplicate and Triplicate Samples

RPDs were below 50% for all field duplicate and triplicate samples.

- Laboratory Duplicate RPDs

RPDs were below 50% for all laboratory duplicates.

- Surrogates Spike Results

All surrogate recoveries were within the appropriate guideline limits (70-130%).

3. Conclusion

Based on the analysis of the stockpile samples, URS is of the opinion that the soil from MSS Alexander Headlands (SP01) can be considered as "clean" and can be used for off-site fill material, pending review and acceptance by the Queensland EPA. It is noted that due to current fire ant restrictions, this soil is not permitted to leave the relevant fire ant zone without meeting the Department of Primary Industries requirements.

* * * *

Respectfully submitted,
URS AUSTRALIA PTY LTD

Robert Storrs
Senior Environmental Scientist

sch4p4(6) Personal information

Willy Van Vaerenbergh
Principal Hydrogeologist

RTI DL RELEASE - EHP

Analytical Results Tables

RTI DL RELEASE - EHP

ANALYTICAL RESULTS
Colmslie Landfarm Sampling

Location
Field ID
Date Sampled
Sample Type
PID reading (ppm)

Alex_SP01_A	Alex_SP01_C	Alex_SP01_E	Alex_SP01_E	Alex_SP01_E
Alex_SP01_A	Alex_SP01_C	Alex_SP01_E	QC01	QC02
23-Sep-04	23-Sep-04	23-Sep-04	23-Sep-04	23-Sep-04
Primary Sample	Primary Sample	Primary Sample	Field Duplicate	Field Triplicate
0.0	0.0	0.0	0.0	0.0

	LOR ¹	Units	NEPA EILs						
Moisture Content (103°C)	0.1	%			5.9	3.7	6.2	6.2	5
TPH:									
C ₆ -C ₉ Fraction	2	mg/kg	ne	100	<2	<2	<2	<2	<5
C ₁₀ -C ₁₄ Fraction	50	mg/kg	ne	100	<50	<50	<50	<50	<10
C ₁₅ -C ₂₈ Fraction	100	mg/kg	ne	1,000	<100	<100	<100	<100	<50
C ₂₉ -C ₃₆ Fraction	100	mg/kg	ne	1,000	<100	<100	<100	<100	<50
BTEX:									
Benzene	0.2	mg/kg	ne	1	<0.2	<0.2	<0.2	<0.2	<0.2
Toluene	0.2	mg/kg	ne	ne	<0.2	<0.2	<0.2	<0.2	<1
Ethylbenzene	0.2	mg/kg	ne	ne	<0.2	<0.2	<0.2	<0.2	<1
meta- & para-Xylene	0.2	mg/kg	ne	ne	<0.2	<0.2	<0.2	<0.2	<2
ortho-Xylene	0.2	mg/kg	ne	ne	<0.2	<0.2	<0.2	<0.2	<1
Total BTEX	1	mg/kg	ne	7	<1	<1	<1	<1	<6.2
Lead	5	mg/kg	1,500	300	9	7	9	9	9

LEGEND:

Greater than Queensland EPA Environmental Investigation Level

na = Not Analysed
ne = Not Established
nd = Not Detected

¹ LOR = level of reporting

ANALYTICAL RESULTS
Colmsie Landfarm Sampling

Location
Sample ID
Date Sampled
Sample Type

QC05	QC06	QC13
QC05	QC06	QC13
23-Sep-04	23-Sep-04	23-Sep-04
Rinsate Blank	Rinsate	Trip Blank

	Units	LOR			
TPH Fractions					
C ₆ -C ₉ Fraction	µg/L	20	nd	nd	nd
C ₁₀ -C ₁₄ Fraction	µg/L	50	nd	nd	na
C ₁₅ -C ₂₈ Fraction	µg/L	100	nd	nd	na
C ₂₉ -C ₃₆ Fraction	µg/L	50	nd	nd	na
BTEX Compounds					
Benzene	µg/L	1	nd	nd	nd
Chlorobenzene	µg/L	2	nd	nd	nd
Toluene	µg/L	2	nd	nd	nd
Ethylbenzene	µg/L	2	nd	nd	nd
meta- & para-Xylene	µg/L	2	nd	nd	nd
ortho-Xylene	µg/L	2	nd	nd	nd
Metals					
Lead	mg/L	0.001	nd	nd	na

na = not analysed
nd = not detected
LOR = Laboratory level of reporting

RTI DL RELEASE - EHP

Appendix A ALS Laboratory Data

RTI DL RELEASE - EHP



ALS Environmental

SAMPLE RECEIPT ADVICE (SRA)

Comprehensive report

Client Details

Client : URS AUSTRALIA PTY LTD
Contact : ALL RESULTS BRISBANE
Address : GPO BOX 302 BRISBANE QLD AUSTRALIA 4001

Project : MOBIL WRF
Order number : - Not provided -
C-O-C Number : - Not provided -
Site : Mobil Colmslie - Landfarm
Sampler : Paul Wybrew

E-mail : brisbane@urscorp.com
Telephone : (07)3243-2111
Facsimile : (07)3243-2199

Laboratory Details

Laboratory : ALS Environmental Brisbane
Manager : Michael Heery
Address : 32 Shand Street Stafford QLD Australia 4053

Quote number : EB20040200
Work order : EB0405721

E-mail : Michael.Heery@alsenviro.com
Telephone : 61-7-32437222
Facsimile : 61-7-32437259

Dates

Date Samples Received : 27 Sep 2004
SRA Issue Date : 27 Sep 2004
Scheduled Reporting Date : 4 Oct 2004

Delivery Details

Mode of Delivery : Carrier.
No. of eskies/boxes : 1 LARGE
Security Seal : Intact.

Temperature : 10 C - Ice bricks present
No. of samples - Received : 3
- Analysed : 3

Comments

- Sample containers do not comply to pretreatment / preservation standards (AS, APHA, USEPA). Please refer to the 'Sample Container(s) / Preservation Non-Compliance Log' at the end of this report for details.
- Sample(s) have been received within recommended holding times.
- Please direct any turn around / technical queries to the laboratory contact designated above.
- Please direct any queries related to sample condition / numbering / breakages to Kerry Curtain.
- Analytical work for this work order will be conducted at ALSE Brisbane.
- Sample Disposal - Aqueous (14 days), Solid (90 days) from date of completion of work order.

Disclaimer : This document contains privileged and confidential information intended only for the use of the addressee. If you are not the addressee, you are hereby notified that you must not disseminate, copy or take action of its contents. If you have received this document in error, please notify ALS immediately.

SAMPLE RECEIPT ADVICE (SRA) - continued

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200



ALS Sample ID.	Client Sample ID - Sample Date	Requested Analysis									
		Type B Mobil Type B	Type C Mobil Type C	W04 TPH/BTEX	W18 TPH(C6 - C9)/BTEX						
EB0405721-001	QC05 - 23 Sep 2004	●	●	●							
EB0405721-002	QC06 - 23 Sep 2004	●	●	●							
EB0405721-003	QC13 - 23 Sep 2004				●						
Total(s) :		2	2	2	1						

RTI DL RELEASE - EHP

SAMPLE RECEIPT ADVICE (SRA) - continued

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200



Requested Reports

● **ALL RESULTS BRISBANE**

- Certificate of Analysis (PDF)	Email	brisbane@urscorp.com
- Interpretive Quality Control Report - NEPM	Email	brisbane@urscorp.com
- Quality Control Report - NEPM	Email	brisbane@urscorp.com
- MRED Export Format	Email	brisbane@urscorp.com
- Chain of Custody Acknowledgement	Email	brisbane@urscorp.com
- Sample Receipt Advice - Comprehensive	Email	brisbane@urscorp.com

● **MR ROB STORRS**

- Certificate of Analysis (PDF)	Email	robert_storrs@urscorp.com
- Interpretive Quality Control Report - NEPM	Email	robert_storrs@urscorp.com
- Quality Control Report - NEPM	Email	robert_storrs@urscorp.com
- MRED Export Format	Email	robert_storrs@urscorp.com
- Chain of Custody Acknowledgement	Email	robert_storrs@urscorp.com
- Sample Receipt Advice - Comprehensive	Email	robert_storrs@urscorp.com
- Invoice	Email	robert_storrs@urscorp.com

● **CAROLINE ENRIGHT**

- Certificate of Analysis (PDF)	Email	caroline_enright@urscorp.com
- Interpretive Quality Control Report - NEPM	Email	caroline_enright@urscorp.com
- Quality Control Report - NEPM	Email	caroline_enright@urscorp.com
- MRED Export Format	Email	caroline_enright@urscorp.com
- Chain of Custody Acknowledgement	Email	caroline_enright@urscorp.com
- Sample Receipt Advice - Comprehensive	Email	caroline_enright@urscorp.com

Sample Container(s) / Preservation Non-Compliance Log

All comparisons are made against pretreatment/preservation AS, APHA, USEPA standards.

Method	Sample Container Received	Preferred Sample Container for Analysis
Client Sample ID (ALS Sample ID.)		
● EP080 : TPH Volatiles/BTEX		
- QC13 (EB0405721-003)	- Misc Amber VOC Vial - Unpreserved	- Amber VOC Vial - HCl

URS - MOBIL COC (ALS)1 -27/09/2004 4:15 PM Page 46 of 546



CERTIFICATE OF ANALYSIS

Client : URS AUSTRALIA PTY LTD	Laboratory : ALS Environmental Brisbane	Page : 1 of 6
Contact : MR ROB STORRS	Contact : Michael Heery	
Address : GPO BOX 302 BRISBANE QLD AUSTRALIA 4001	Address : 32 Shand Street Stafford QLD Australia 4053	Work order : EB0405721
Project : MOBIL WRF	Quote number : EB20040200	Date received : 27 Sep 2004
Order number : - Not provided -		Date issued : 04 Oct 2004
C-O-C number : - Not provided -		
Site : Mobil Colmslie - Landfarm		
E-mail : robert_storrs@urscorp.com	E-mail : Michael.Heery@alsenviro.com	No. of samples
Telephone : (07)3243-2111	Telephone : 61-7-32437222	Received : 3
Facsimile : (07)3243-2199	Facsimile : 61-7-32437259	Analysed : 3

This final report was issued on Monday, October 4, 2004 for the ALSE work order reference EB0405721 and supersedes any previous reports with this reference.

Results apply to the samples as submitted. All pages of this report have been checked and approved for release.

This report contains the following information:

- Analytical results for samples submitted
- Surrogate control limits

ALSE - QUALITY, SERVICE and TECHNOLOGY provided GLOBALLY



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The Laboratory is accredited by the National Association of Testing Authorities, Australia. The test(s) reported herein have been performed in accordance with its scope of accreditation. This document shall not be reproduced except in full.

RTI 13-329

This document has been digitally signed by those names that appear on this report and are the authorised signatories. Digital signing has been carried out in compliance with procedures specified in 21 CFR Part 11.

Signatory

Kim McCabe
Mat Taylor
Shaun Crabb

Department

Inorganics - NATA 818 (Brisbane)
Organics - NATA 818 (Brisbane)
Inorganics - NATA 818 (Brisbane)

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

Page Number : 2 of 6
Issue Date : 04 Oct 2004



When moisture determination has been performed, results are reported on a dry weight basis. When a reported 'less than' result is higher than the LOR, this may be due to primary sample extracts/digestion dilution and/or insufficient sample amount for analysis. Surrogate Recovery Limits are static and based on USEPA SW846 or ALS-QWI/EN38 (in the absence of specified USEPA limits).

Abbreviations: CAS number = Chemical Abstract Services number, LOR = Limit of Reporting. # Indicates a raised LOR, * Indicates failed Surrogate Recoveries.

When date(s) are shown bracketed, these have been assumed by the laboratory for process purposes.

Analytical Results

Client Sample ID :				QC05	QC06	QC13		
Sample Matrix Type / Description :				WATER / LIQUID	WATER / LIQUID	WATER / LIQUID		
Sample Date / Time :				23 Sep 2004 15:00	23 Sep 2004 15:00	23 Sep 2004 15:00		
Laboratory Sample ID :				EB0405721-001	EB0405721-002	EB0405721-003		
Analyte	CAS number	LOR	Units					
EG020F: Dissolved Metals by ICP-MS								
Arsenic	7440-38-2	0.001	mg/L	<0.001	0.002	—		
Barium	7440-39-3	0.001	mg/L	0.001	0.001	—		
Cadmium	7440-43-9	0.0001	mg/L	0.0002	0.0004	—		
Chromium	7440-47-3	0.001	mg/L	<0.001	<0.001	—		
Copper	7440-50-8	0.001	mg/L	<0.001	0.001	—		
Lead	7439-92-1	0.001	mg/L	<0.001	0.001	—		
Nickel	7440-02-0	0.001	mg/L	<0.001	<0.001	—		
Vanadium	7440-62-2	0.001	mg/L	<0.001	0.001	—		
Zinc	7440-66-6	0.001	mg/L	0.006	0.009	—		
EG035F: Dissolved Mercury by FIMS								
Mercury	7439-97-6	0.0001	mg/L	<0.0001	<0.0001	—		
EP074D: Fumigants								
2,2-Dichloropropane	594-20-7	5	µg/L	<5	<5	—		
1,2-Dichloropropane	78-87-5	5	µg/L	<5	<5	—		
cis-1,3-Dichloropropylene	10061-01-5	5	µg/L	<5	<5	—		
trans-1,3-Dichloropropylene	10061-02-6	5	µg/L	<5	<5	—		
1,2-Dibromoethane (EDB)	106-93-4	5	µg/L	<5	<5	—		
EP074E: Chlorinated Aliphatic Compounds								
Dichlorodifluoromethane	75-71-8	50	µg/L	<50	<50	—		
Chloromethane	74-87-3	50	µg/L	<50	<50	—		
Vinyl chloride	75-01-4	50	µg/L	<50	<50	—		
Bromomethane	74-83-9	50	µg/L	<50	<50	—		
Chloroethane	75-00-3	50	µg/L	<50	<50	—		
Trichlorofluoromethane	75-69-4	50	µg/L	<50	<50	—		
1,1-Dichloroethene	75-35-4	5	µg/L	<5	<5	—		
Iodomethane	74-88-4	5	µg/L	<5	<5	—		
Methylene chloride	75-09-2	5	µg/L	<5	<5	—		
trans-1,2-Dichloroethene	156-60-5	5	µg/L	<5	<5	—		
1,1-Dichloroethane	75-34-3	5	µg/L	<5	<5	—		
cis-1,2-Dichloroethene	156-59-2	5	µg/L	<5	<5	—		
1,1,1-Trichloroethane	71-55-6	5	µg/L	<5	<5	—		
1,1-Dichloropropylene	563-58-6	5	µg/L	<5	<5	—		



Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

Page Number : 3 of 6
Issue Date : 04 Oct 2004

ALS Environmental

Analytical Results

Client Sample ID :

QC05

QC06

QC13

Sample Matrix Type / Description :

WATER / LIQUID

WATER / LIQUID

WATER / LIQUID

Sample Date / Time :

23 Sep 2004
15:00

23 Sep 2004
15:00

23 Sep 2004
15:00

Laboratory Sample ID :

EB0405721-001

EB0405721-002

EB0405721-003

Analyte	CAS number	LOR	Units					
EP074E: Chlorinated Aliphatic Compounds								
Carbon Tetrachloride	56-23-5	5	µg/L	<5	<5	—		
1,2-Dichloroethane	107-06-2	5	µg/L	<5	<5	—		
Trichloroethene	79-01-6	5	µg/L	<5	<5	—		
Dibromomethane	74-95-3	5	µg/L	<5	<5	—		
1,1,2-Trichloroethane	79-00-5	5	µg/L	<5	<5	—		
1,3-Dichloropropane	142-28-9	5	µg/L	<5	<5	—		
Tetrachloroethene	127-18-4	5	µg/L	<5	<5	—		
1,1,1,2-Tetrachloroethane	630-20-6	5	µg/L	<5	<5	—		
trans-1,4-Dichloro-2-butene	110-57-6	5	µg/L	<5	<5	—		
cis-1,4-Dichloro-2-butene	1476-11-5	5	µg/L	<5	<5	—		
1,1,2,2-Tetrachloroethane	79-34-5	5	µg/L	<5	<5	—		
1,2,3-Trichloropropane	96-18-4	5	µg/L	<5	<5	—		
Pentachloroethane	76-01-7	5	µg/L	<5	<5	—		
1,2-Dibromo-3-chloropropane	96-12-8	5	µg/L	<5	<5	—		
Hexachlorobutadiene	87-68-3	5	µg/L	<5	<5	—		
EP074F: Chlorinated Aromatic Compounds								
Chlorobenzene	108-90-7	5	µg/L	<5	<5	—		
Bromobenzene	108-86-1	5	µg/L	<5	<5	—		
2-Chlorotoluene	95-49-8	5	µg/L	<5	<5	—		
4-Chlorotoluene	106-43-4	5	µg/L	<5	<5	—		
1,3-Dichlorobenzene	541-73-1	5	µg/L	<5	<5	—		
1,4-Dichlorobenzene	106-46-7	5	µg/L	<5	<5	—		
1,2-Dichlorobenzene	95-50-1	5	µg/L	<5	<5	—		
1,2,4-Trichlorobenzene	120-82-1	5	µg/L	<5	<5	—		
1,2,3-Trichlorobenzene	87-61-6	5	µg/L	<5	<5	—		
EP074G: Trihalomethanes								
Chloroform	67-66-3	5	µg/L	<5	<5	—		
Bromodichloromethane	75-27-4	5	µg/L	<5	<5	—		
Dibromochloromethane	124-48-1	5	µg/L	<5	<5	—		
Bromoform	75-25-2	5	µg/L	<5	<5	—		
EP075(SIM)A: Phenolic Compounds								
Phenol	108-95-2	0.5	µg/L	<0.5	<0.5	—		
2-Chlorophenol	95-57-8	0.3	µg/L	<0.3	<0.3	—		
2-Methylphenol	95-48-7	0.5	µg/L	<0.5	<0.5	—		
3- & 4-Methylphenol	1319-77-3	0.5	µg/L	<0.5	<0.5	—		
2-Nitrophenol	88-75-5	0.5	µg/L	<0.5	<0.5	—		

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

Page Number : 4 of 6
Issue Date : 04 Oct 2004



Analytical Results

Client Sample ID :				QC05	QC06	QC13		
Sample Matrix Type / Description :				WATER / LIQUID	WATER / LIQUID	WATER / LIQUID		
Sample Date / Time :				23 Sep 2004 15:00	23 Sep 2004 15:00	23 Sep 2004 15:00		
Laboratory Sample ID :				EB0405721-001	EB0405721-002	EB0405721-003		
Analyte	CAS number	LOR	Units					
EP075(SIM)A: Phenolic Compounds								
2,4-Dimethylphenol	105-67-9	0.5	µg/L	<0.5	<0.5	—		
2,4-Dichlorophenol	120-83-2	0.3	µg/L	<0.3	<0.3	—		
2,6-Dichlorophenol	87-65-0	0.3	µg/L	<0.3	<0.3	—		
4-Chloro-3-Methylphenol	59-50-7	0.3	µg/L	<0.3	<0.3	—		
2,4,6-Trichlorophenol	88-06-2	0.3	µg/L	<0.3	<0.3	—		
2,4,5-Trichlorophenol	95-95-4	0.3	µg/L	<0.3	<0.3	—		
Pentachlorophenol	87-86-5	0.3	µg/L	<0.3	<0.3	—		
EP075(SIM)B: Polynuclear Aromatic Hydrocarbons								
Naphthalene	91-20-3	0.5	µg/L	<0.5	<0.5	—		
Acenaphthylene	208-96-8	0.5	µg/L	<0.5	<0.5	—		
Acenaphthene	83-32-9	0.5	µg/L	<0.5	<0.5	—		
Fluorene	86-73-7	0.5	µg/L	<0.5	<0.5	—		
Phenanthrene	85-01-8	0.5	µg/L	<0.5	<0.5	—		
Anthracene	120-12-7	0.5	µg/L	<0.5	<0.5	—		
Fluoranthene	206-44-0	0.5	µg/L	<0.5	<0.5	—		
Pyrene	129-00-0	0.5	µg/L	<0.5	<0.5	—		
Benz(a)anthracene	56-55-3	0.5	µg/L	<0.5	<0.5	—		
Chrysene	218-01-9	0.5	µg/L	<0.5	<0.5	—		
Benzo(b)fluoranthene	205-99-2	0.5	µg/L	<0.5	<0.5	—		
Benzo(k)fluoranthene	207-08-9	0.5	µg/L	<0.5	<0.5	—		
Benzo(a)pyrene	50-32-8	0.3	µg/L	<0.3	<0.3	—		
Indeno(1,2,3-cd)pyrene	193-39-5	0.5	µg/L	<0.5	<0.5	—		
Dibenz(a,h)anthracene	53-70-3	0.5	µg/L	<0.5	<0.5	—		
Benzo(g,h,i)perylene	191-24-2	0.5	µg/L	<0.5	<0.5	—		
EP080/071: Total Petroleum Hydrocarbons								
C6 - C9 Fraction		20	µg/L	<20	<20	<20		
C10 - C14 Fraction		50	µg/L	<50	<50	—		
C15 - C28 Fraction		100	µg/L	<100	<100	—		
C29 - C36 Fraction		50	µg/L	<50	<50	—		
EP080: BTEX								
Benzene	71-43-2	1	µg/L	<1	<1	<1		
Toluene	108-88-3	2	µg/L	<2	<2	<2		
Ethylbenzene	100-41-4	2	µg/L	<2	<2	<2		
meta- & para-Xylene	108-38-3 106-42-3	2	µg/L	<2	<2	<2		
ortho-Xylene	95-47-6	2	µg/L	<2	<2	<2		

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

Page Number : 5 of 6
Issue Date : 04 Oct 2004



Analytical Results

Client Sample ID :				QC05	QC06	QC13		
Sample Matrix Type / Description :				WATER / LIQUID	WATER / LIQUID	WATER / LIQUID		
Sample Date / Time :				23 Sep 2004 15:00	23 Sep 2004 15:00	23 Sep 2004 15:00		
Laboratory Sample ID :				EB0405721-001	EB0405721-002	EB0405721-003		
Analyte	CAS number	LOR	Units					
EP074S: VOC Surrogates								
1,2-Dichloroethane-D4	17060-07-0	0.1	%	97.8	104	—		
Toluene-D8	2037-26-5	0.1	%	99.3	98.0	—		
4-Bromofluorobenzene	460-00-4	0.1	%	87.2	86.6	—		
EP075(SIM)S: Phenolic Compound Surrogates								
2-Fluorophenol	367-12-4	0.1	%	54.5	52.9	—		
Phenol-d6	13127-88-3	0.1	%	35.8	34.9	—		
2-Chlorophenol-D4	93951-73-6	0.1	%	80.1	75.5	—		
2,4,6-Tribromophenol	118-79-6	0.1	%	76.4	77.2	—		
EP075(SIM)T: PAH Surrogates								
2-Fluorobiphenyl	321-60-8	0.1	%	50.6	68.6	—		
Anthracene-d10	1719-06-8	0.1	%	80.7	85.8	—		
4-Terphenyl-d14	1718-51-0	0.1	%	89.2	92.5	—		
EP080S: TPH(V)/BTEX Surrogates								
1,2-Dichloroethane-D4	17060-07-0	0.1	%	97.8	104	102		
Toluene-D8	2037-26-5	0.1	%	99.3	98.0	105		
4-Bromofluorobenzene	460-00-4	0.1	%	87.2	86.6	86.5		

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

Page Number : 6 of 6
Issue Date : 04 Oct 2004



Surrogate Control Limits

The analytical procedures used by ALS Environmental are based on established internationally-recognized procedures such as those published by the US EPA, APHA, AS and NEPM. In house procedure are employed in the absence of documented standards or by client request. The following report provides brief descriptions of the analytical procedures employed for results reported herein. Reference methods from which ALSE methods are based are provided in parenthesis.

Matrix Type: WATER

Surrogate Control Limits

Method name	Analyte name	Lower Limit	Upper Limit
EP074: Volatile Organic Compounds			
EP074S: VOC Surrogates	1,2-Dichloroethane-D4	80	120
	Toluene-D8	88	110
	4-Bromofluorobenzene	86	115
EP075(SIM): PAH/Phenols (GC/MS - SIM)			
EP075(SIM)S: Phenolic Compound Surrogates	2-Fluorophenol	21	100
	Phenol-d6	10	94
	2-Chlorophenol-D4	23	134
	2,4,6-Tribromophenol	10	123
EP075(SIM)T: PAH Surrogates	2-Fluorobiphenyl	43	116
	Anthracene-d10	27	133
	4-Terphenyl-d14	33	141
EP080: TPH Volatiles/BTEX			
EP080S: TPH(V)/BTEX Surrogates	1,2-Dichloroethane-D4	80	120
	Toluene-D8	88	110
	4-Bromofluorobenzene	86	115



QUALITY CONTROL REPORT

Client	: URS AUSTRALIA PTY LTD	Laboratory	: ALS Environmental Brisbane	Page	: 1 of 9
Contact	: MR ROB STORRS	Contact	: Michael Heery	Work order	: EB0405721
Address	: GPO BOX 302 BRISBANE QLD AUSTRALIA 4001	Address	: 32 Shand Street Stafford QLD Australia 4053		
Project	: MOBIL WRF	Quote number	: EB20040200	Date received	: 27 Sep 2004
Order number	: - Not provided -			Date issued	: 04 Oct 2004
C-O-C number	: - Not provided -				
Site	: Mobil Colmslie - Landfarm				
E-mail	: robert_storrs@urscorp.com	E-mail	: Michael.Heery@alsenviro.com	No. of samples	
Telephone	: (07)3243-2111	Telephone	: 61-7-32437222	Received	: 3
Facsimile	: (07)3243-2199	Facsimile	: 61-7-32437259	Analysed	: 3

This final report was issued on Monday, October 4, 2004 for the ALSE work order reference EB0405721 and supersedes any previous reports with this reference.

Results apply to the samples as submitted. All pages of this report have been checked and approved for release.

This report contains the following information:

- Laboratory Duplicates (DUP); Relative Percentage Difference (RPD) and Acceptance Limits
- Method Blank (MB) and Laboratory Control Samples (LCS); Recovery and Acceptance Limits
- Matrix Spikes (MS); Recovery and Acceptance Limits

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NATA Accredited Laboratory - 825

The Laboratory is accredited by the National Association of Testing Authorities, Australia. The test(s) reported herein have been performed in accordance with its scope of accreditation. This document shall not be reproduced except in full.

This document has been digitally signed by those names that appear on this report and are the authorised signatories. Digital signing has been carried out in compliance with procedures specified in 21 CFR Part 11.

Signatory

Kim McCabe
Mat Taylor
Shaun Crabb

Department

Inorganics - NATA 818 (Brisbane)
Organics - NATA 818 (Brisbane)
Inorganics - NATA 818 (Brisbane)

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

Page Number : 2 of 9
Issue Date : 04 Oct 2004



Quality Control Report - Laboratory Duplicates (DUP)

The quality control term **Laboratory Duplicate** refers to an intralaboratory split sample randomly selected from the sample batch. Laboratory duplicates provide information on method precision and sample heterogeneity.
- Anonymous - Client Sample IDs refer to samples which are not specifically part of this work order but formed part of the QC process lot. **Abbreviations:** **LOR** = Limit of Reporting, **RPD** = Relative Percent Difference.
* Indicates failed QC. The permitted ranges for the RPD of Laboratory Duplicates (relative percent deviation) are specified in ALS Method QWI-EN/38 and are dependent on the magnitude of results in comparison to the level of reporting:- Result < 10 times LOR, no limit - Result between 10 and 20 times LOR, 0% - 50% - Result > 20 times LOR, 0% - 20%

Matrix Type: WATER

Laboratory Duplicates (DUP) Report

Laboratory Sample ID	Client Sample ID	Analyte name	LOR	Original Result	Duplicate Result	RPD
EG020A-F: Dissolved Metals by ICP-MS - Suite A						
EG020F: Dissolved Metals by ICP-MS - (QC Lot: 17556)				mg/L	mg/L	%
EB0405709-014	- Anonymous -	Arsenic	0.001 mg/L	0.015	0.013	15.6
		Barium	0.001 mg/L	0.146	0.141	3.5
		Cadmium	0.0001 mg/L	0.0010	0.0009	11.4
		Chromium	0.001 mg/L	0.008	0.005	47.5
		Copper	0.001 mg/L	0.004	0.004	0.0
		Lead	0.001 mg/L	0.029	0.028	0.0
		Nickel	0.001 mg/L	0.009	0.007	29.7
		Vanadium	0.001 mg/L	0.002	0.001	0.0
		Zinc	0.001 mg/L	0.333	0.310	7.0
EB0405710-009	- Anonymous -	Arsenic	0.001 mg/L	0.003	0.001	64.8
		Barium	0.001 mg/L	0.089	0.092	3.4
		Cadmium	0.0001 mg/L	0.0032	0.0032	0.0
		Chromium	0.001 mg/L	0.014	0.011	17.7
		Copper	0.001 mg/L	0.046	0.047	2.6
		Lead	0.001 mg/L	0.035	0.035	0.0
		Nickel	0.001 mg/L	0.660	0.665	0.6
		Vanadium	0.001 mg/L	<0.001	0.002	88.0
		Zinc	0.001 mg/L	0.292	0.297	1.7
EG020F: Dissolved Metals by ICP-MS - (QC Lot: 17557)				mg/L	mg/L	%
EB0405721-002	QC06	Arsenic	0.001 mg/L	0.002	<0.001	0.0
		Barium	0.001 mg/L	0.001	<0.001	0.0
		Cadmium	0.0001 mg/L	0.0004	0.0004	0.0
		Chromium	0.001 mg/L	<0.001	<0.001	0.0
		Copper	0.001 mg/L	0.001	<0.001	0.0
		Lead	0.001 mg/L	0.001	<0.001	0.0
		Nickel	0.001 mg/L	<0.001	<0.001	0.0
		Vanadium	0.001 mg/L	0.001	<0.001	0.0
		Zinc	0.001 mg/L	0.009	0.009	0.0
EG035F: Dissolved Mercury by FIMS						
EG035F: Dissolved Mercury by FIMS - (QC Lot: 17619)				mg/L	mg/L	%
EB0405579-001	- Anonymous -	Mercury	0.0001 mg/L	<0.0005	<0.0005	0.0
EB0405709-006	- Anonymous -	Mercury	0.0001 mg/L	<0.0001	<0.0001	0.0

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

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Issue Date : 04 Oct 2004



ALS Environmental

Matrix Type: WATER

Laboratory Duplicates (DUP) Report

Laboratory Sample ID	Client Sample ID	Analyte name	LOR	Original Result	Duplicate Result	RPD
EP074: Volatile Organic Compounds						
EP074D: Fumigants - (QC Lot: 17615)						
EB0405721-001	QC05	2,2-Dichloropropane	5 µg/L	<5	<5	0.0
		1,2-Dichloropropane	5 µg/L	<5	<5	0.0
		cis-1,3-Dichloropropylene	5 µg/L	<5	<5	0.0
		trans-1,3-Dichloropropylene	5 µg/L	<5	<5	0.0
		1,2-Dibromoethane (EDB)	5 µg/L	<5	<5	0.0
EB0405721-001	QC05	Dichlorodifluoromethane	50 µg/L	<50	<50	0.0
		Chloromethane	50 µg/L	<50	<50	0.0
		Vinyl chloride	50 µg/L	<50	<50	0.0
		Bromomethane	50 µg/L	<50	<50	0.0
		Chloroethane	50 µg/L	<50	<50	0.0
		Trichlorofluoromethane	50 µg/L	<50	<50	0.0
		1,1-Dichloroethene	5 µg/L	<5	<5	0.0
		Iodomethane	5 µg/L	<5	<5	0.0
		Methylene chloride	5 µg/L	<5	<5	0.0
		trans-1,2-Dichloroethene	5 µg/L	<5	<5	0.0
		1,1-Dichloroethane	5 µg/L	<5	<5	0.0
		cis-1,2-Dichloroethene	5 µg/L	<5	<5	0.0
		1,1,1-Trichloroethane	5 µg/L	<5	<5	0.0
		1,1-Dichloropropylene	5 µg/L	<5	<5	0.0
		Carbon Tetrachloride	5 µg/L	<5	<5	0.0
		1,2-Dichloroethane	5 µg/L	<5	<5	0.0
		Trichloroethene	5 µg/L	<5	<5	0.0
		Dibromomethane	5 µg/L	<5	<5	0.0
		1,1,2-Trichloroethane	5 µg/L	<5	<5	0.0
		1,3-Dichloropropane	5 µg/L	<5	<5	0.0
		Tetrachloroethene	5 µg/L	<5	<5	0.0
		1,1,1,2-Tetrachloroethane	5 µg/L	<5	<5	0.0
		trans-1,4-Dichloro-2-butene	5 µg/L	<5	<5	0.0
		cis-1,4-Dichloro-2-butene	5 µg/L	<5	<5	0.0
		1,1,2,2-Tetrachloroethane	5 µg/L	<5	<5	0.0
		1,2,3-Trichloropropane	5 µg/L	<5	<5	0.0
		Pentachloroethane	5 µg/L	<5	<5	0.0
		1,2-Dibromo-3-chloropropane	5 µg/L	<5	<5	0.0
		Hexachlorobutadiene	5 µg/L	<5	<5	0.0

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

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Issue Date : 04 Oct 2004



Matrix Type: WATER

Laboratory Duplicates (DUP) Report

Laboratory Sample ID	Client Sample ID	Analyte name	LOR	Original Result	Duplicate Result	RPD
EB0405721-001	QC05	Chlorobenzene	5 µg/L	<5	<5	0.0
		Bromobenzene	5 µg/L	<5	<5	0.0
		2-Chlorotoluene	5 µg/L	<5	<5	0.0
		4-Chlorotoluene	5 µg/L	<5	<5	0.0
		1,3-Dichlorobenzene	5 µg/L	<5	<5	0.0
		1,4-Dichlorobenzene	5 µg/L	<5	<5	0.0
		1,2-Dichlorobenzene	5 µg/L	<5	<5	0.0
		1,2,4-Trichlorobenzene	5 µg/L	<5	<5	0.0
		1,2,3-Trichlorobenzene	5 µg/L	<5	<5	0.0
EB0405721-001	QC05	Chloroform	5 µg/L	<5	<5	0.0
		Bromodichloromethane	5 µg/L	<5	<5	0.0
		Dibromochloromethane	5 µg/L	<5	<5	0.0
		Bromoform	5 µg/L	<5	<5	0.0

EP080: TPH Volatiles/BTEX

EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17614)				µg/L	µg/L	%
EB0405721-001	QC05	C6 - C9 Fraction	20 µg/L	<20	<20	0.0
EB0405721-001	QC05	Benzene	1 µg/L	<1	<1	0.0
		Toluene	2 µg/L	<2	<2	0.0
		Ethylbenzene	2 µg/L	<2	<2	0.0
		meta- & para-Xylene	2 µg/L	<2	<2	0.0
		ortho-Xylene	2 µg/L	<2	<2	0.0

RTI DL RELEASE - CHIP

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

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Issue Date : 04 Oct 2004



Quality Control Report - Method Blank (MB) and Laboratory Control Samples (LCS)

The quality control term **Method / Laboratory Blank** refers to an analyte free matrix to which all reagents are added in the same volumes or proportions as used in standard sample preparation. The purpose of this QC type is to monitor potential laboratory contamination. The quality control term **Laboratory Control Sample (LCS)** refers to a known, interference free matrix spiked with target analytes or certified reference material. The purpose of this QC type is to monitor method precision and accuracy independent of sample matrix. Dynamic Recovery Limits are based on statistical evaluation of actual laboratory data. Abbreviations: LOR = Limit of reporting.

* Indicates failed QC. Refer to the Summary of all QC Outliers within the Interpretive Quality Control Report.

Matrix Type: WATER

Method Blank (MB) and Laboratory Control Samples (LCS) Report

		Method blank result	Actual Results		Recovery Limits	
Analyte name	LOR		Spike concentration	Spike Recovery	Dynamic Recovery Limits	
					LCS	Low
EG020A-F: Dissolved Metals by ICP-MS - Suite A						
EG020F: Dissolved Metals by ICP-MS - (QC Lot: 17556)						
Arsenic	0.001 mg/L	mg/L	mg/L	%	%	%
Barium	0.001 mg/L	<0.001	0.100	105	70	130
Cadmium	0.0001 mg/L	<0.0001	0.100	95.6	70	130
Chromium	0.001 mg/L	<0.001	0.100	89.5	70	130
Copper	0.001 mg/L	<0.001	0.100	96.5	70	130
Lead	0.001 mg/L	<0.001	0.100	91.0	70	130
Nickel	0.001 mg/L	<0.001	0.100	91.9	70	130
Vanadium	0.001 mg/L	<0.001	0.100	87.8	70	130
Zinc	0.001 mg/L	<0.001	0.100	99.1	70	130
EG020F: Dissolved Metals by ICP-MS - (QC Lot: 17557)						
Arsenic	0.001 mg/L	mg/L	mg/L	%	%	%
Barium	0.001 mg/L	<0.001	0.100	112	70	130
Cadmium	0.0001 mg/L	<0.0001	0.100	101	70	130
Chromium	0.001 mg/L	<0.001	0.100	86.0	70	130
Copper	0.001 mg/L	<0.001	0.100	102	70	130
Lead	0.001 mg/L	<0.001	0.100	91.7	70	130
Nickel	0.001 mg/L	<0.001	0.100	94.9	70	130
Vanadium	0.001 mg/L	<0.001	0.100	91.9	70	130
Zinc	0.001 mg/L	<0.001	0.100	106	70	130
EG035F: Dissolved Mercury by FIMS						
EG035F: Dissolved Mercury by FIMS - (QC Lot: 17619)						
Mercury	0.0001 mg/L	mg/L	mg/L	%	%	%
		<0.0001	0.010	105	70	130
EP071: TPH - Semivolatile Fraction						
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17576)						
C10 - C14 Fraction	50 µg/L	µg/L	µg/L	%	%	%
		<50	740	95.9	56	96
C15 - C28 Fraction	100 µg/L	<100	1059	102	52	110
C29 - C36 Fraction	50 µg/L	<50	—	—	—	—

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

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Issue Date : 04 Oct 2004



ALS Environmental

Matrix Type: WATER

Method Blank (MB) and Laboratory Control Samples (LCS) Report

		Method blank result	Actual Results		Recovery Limits	
Analyte name	LOR		Spike concentration	Spike Recovery	Dynamic Recovery Limits	
				LCS	Low	High
EP074: Volatile Organic Compounds						
EP074D: Fumigants - (QC Lot: 17615)						
2,2-Dichloropropane	5 µg/L	µg/L	µg/L	%	%	%
		<5	10	111	64	123
1,2-Dichloropropane	5 µg/L	<5	10	119	77	119
cis-1,3-Dichloropropylene	5 µg/L	<5	20	98.9	71	124
trans-1,3-Dichloropropylene	5 µg/L	<5	20	101	72	124
1,2-Dibromoethane (EDB)	5 µg/L	<5	10	103	72	126
EP074E: Chlorinated Aliphatic Compounds - (QC Lot: 17615)						
Dichlorodifluoromethane	50 µg/L	µg/L	µg/L	%	%	%
		<50	100	111	64	135
Chloromethane	50 µg/L	<50	100	98.8	71	126
Vinyl chloride	50 µg/L	<50	100	110	69	136
Bromomethane	50 µg/L	<50	100	108	54	146
Chloroethane	50 µg/L	<50	100	* 74.6	75	130
Trichlorofluoromethane	50 µg/L	<50	100	103	76	127
1,1-Dichloroethene	5 µg/L	<5	10	104	77	126
Iodomethane	5 µg/L	<5	10	84.6	56	135
Methylene chloride	5 µg/L	<5	10	107	45	162
trans-1,2-Dichloroethene	5 µg/L	<5	10	103	77	125
1,1-Dichloroethane	5 µg/L	<5	10	108	76	126
cis-1,2-Dichloroethene	5 µg/L	<5	10	99.3	68	127
1,1,1-Trichloroethane	5 µg/L	<5	10	106	83	119
1,1-Dichloropropylene	5 µg/L	<5	10	103	74	120
Carbon Tetrachloride	5 µg/L	<5	10	95.8	83	118
1,2-Dichloroethane	5 µg/L	<5	10	104	75	128
Trichloroethene	5 µg/L	<5	10	99.2	79	119
Dibromomethane	5 µg/L	<5	10	98.2	72	128
1,1,2-Trichloroethane	5 µg/L	<5	10	101	74	130
1,3-Dichloropropane	5 µg/L	<5	10	95.3	78	123
Tetrachloroethene	5 µg/L	<5	10	91.6	76	121
1,1,1,2-Tetrachloroethane	5 µg/L	<5	—	—	—	—
trans-1,4-Dichloro-2-butene	5 µg/L	<5	10	127	42	159
cis-1,4-Dichloro-2-butene	5 µg/L	<5	10	99.0	48	145
1,1,2,2-Tetrachloroethane	5 µg/L	<5	10	108	75	128
1,2,3-Trichloropropane	5 µg/L	<5	10	109	66	135
Pentachloroethane	5 µg/L	<5	10	113	71	124
1,2-Dibromo-3-chloropropane	5 µg/L	<5	10	109	62	142
Hexachlorobutadiene	5 µg/L	<5	10	93.7	60	136

Release

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

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Issue Date : 04 Oct 2004



Matrix Type: WATER

Method Blank (MB) and Laboratory Control Samples (LCS) Report

		Method blank result	Actual Results		Recovery Limits	
Analyte name	LOR		Spike concentration	Spike Recovery	Dynamic Recovery Limits	
					Low	High
EP074F: Chlorinated Aromatic Compounds - (QC Lot: 17615)		µg/L	µg/L	%	%	%
Chlorobenzene	5 µg/L	<5	10	98.8	82	112
Bromobenzene	5 µg/L	<5	10	92.0	78	120
2-Chlorotoluene	5 µg/L	<5	10	90.3	75	122
4-Chlorotoluene	5 µg/L	<5	10	101	75	124
1,3-Dichlorobenzene	5 µg/L	<5	10	102	75	118
1,4-Dichlorobenzene	5 µg/L	<5	10	90.1	75	119
1,2-Dichlorobenzene	5 µg/L	<5	10	102	80	118
1,2,4-Trichlorobenzene	5 µg/L	<5	10	86.1	61	126
1,2,3-Trichlorobenzene	5 µg/L	<5	10	95.2	70	124
EP074G: Trihalomethanes - (QC Lot: 17615)		µg/L	µg/L	%	%	%
Chloroform	5 µg/L	<5	10	101	80	124
Bromodichloromethane	5 µg/L	<5	10	103	78	124
Dibromochloromethane	5 µg/L	<5	10	107	71	129
Bromoform	5 µg/L	<5	10	93.5	76	123

RTI DL RELEASE - EHP

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

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Issue Date : 04 Oct 2004



Matrix Type: WATER

Method Blank (MB) and Laboratory Control Samples (LCS) Report

Analyte name	LOR	Method blank result	Actual Results		Recovery Limits	
			Spike concentration	Spike Recovery	Dynamic Recovery Limits	
				LCS	Low	High
EP075(SIM): PAH/Phenols (GC/MS - SIM)						
EP075(SIM)A: Phenolic Compounds - (QC Lot: 17578)		µg/L	µg/L	%	%	%
Phenol	1.0 µg/L	<1.0	5	38.8	10	112
2-Chlorophenol	1.0 µg/L	<1.0	5	77.8	29	109
2-Methylphenol	1.0 µg/L	<1.0	5	74.4	28	94
3- & 4-Methylphenol	1.0 µg/L	<1.0	10	68.4	23	89
2-Nitrophenol	1.0 µg/L	<1.0	5	100	29	122
2,4-Dimethylphenol	1.0 µg/L	<1.0	5	85.4	32	119
2,4-Dichlorophenol	1.0 µg/L	<1.0	5	89.5	32	116
2,6-Dichlorophenol	1.0 µg/L	<1.0	5	90.2	27	120
4-Chloro-3-Methylphenol	1.0 µg/L	<1.0	5	96.4	28	115
2,4,6-Trichlorophenol	1.0 µg/L	<1.0	5	108	37	128
2,4,5-Trichlorophenol	1.0 µg/L	<1.0	5	105	26	123
Pentachlorophenol	2.0 µg/L	<2.0	10	90.0	14	158
EP075(SIM)B: Polynuclear Aromatic Hydrocarbons - (QC Lot: 17578)		µg/L	µg/L	%	%	%
Naphthalene	1.0 µg/L	<1.0	5	74.7	21	108
Acenaphthylene	1.0 µg/L	<1.0	5	94.7	33	121
Acenaphthene	1.0 µg/L	<1.0	5	84.0	47	112
Fluorene	1.0 µg/L	<1.0	5	92.7	59	128
Phenanthrene	1.0 µg/L	<1.0	5	95.3	54	133
Anthracene	1.0 µg/L	<1.0	5	93.1	38	128
Fluoranthene	1.0 µg/L	<1.0	5	101	39	134
Pyrene	1.0 µg/L	<1.0	5	109	52	132
Benz(a)anthracene	1.0 µg/L	<1.0	5	109	39	130
Chrysene	1.0 µg/L	<1.0	5	107	39	133
Benzo(b)fluoranthene	1.0 µg/L	<1.0	5	96.9	44	143
Benzo(k)fluoranthene	1.0 µg/L	<1.0	5	96.9	44	143
Benzo(a)pyrene	0.5 µg/L	<0.5	5	89.5	39	117
Indeno(1,2,3,cd)pyrene	1.0 µg/L	<1.0	5	75.5	23	137
Dibenz(a,h)anthracene	1.0 µg/L	<1.0	5	77.8	24	138
Benzo(g,h,i)perylene	1.0 µg/L	<1.0	5	65.2	25	132
EP080: TPH Volatiles/BTEX						
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17614)		µg/L	µg/L	%	%	%
C6 - C9 Fraction	20 µg/L	<20	260	91.4	80	119
EP080: BTEX - (QC Lot: 17614)		µg/L	µg/L	%	%	%
Benzene	1 µg/L	<1	10	106	81	121
Toluene	2 µg/L	<2	10	88.6	84	117
Ethylbenzene	2 µg/L	<2	10	90.1	82	115
meta- & para-Xylene	2 µg/L	<2	10	90.7	79	119
ortho-Xylene	2 µg/L	<2	10	92.0	79	122

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405721
ALS Quote Reference : EB20040200

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Issue Date : 04 Oct 2004



Quality Control Report - Matrix Spikes (MS)

The quality control term **Matrix Spike (MS)** refers to an intralaboratory split sample spiked with a representative set of target analytes. The purpose of this QC type is to monitor potential matrix effects on analyte recoveries. Static Recovery Limits as per laboratory Data Quality Objectives (DQO's). 'Ideal' recovery ranges stated may be waived in the event of sample matrix interferences. - Anonymous - Client Sample IDs refer to samples which are not specifically part of this work order but formed part of the QC process lot. **Abbreviations: LOR = Limit of Reporting, RPD = Relative Percent Difference.**

* Indicates failed QC. Refer to the Summary of all QC Outliers within the Interpretive Quality Control Report.

Matrix Type: WATER

Matrix Type: WATER					Matrix Spike (MS) Report			
Analyte name	Laboratory Sample ID	Client Sample ID	LOR	Spike Concentration	Actual Results		Recovery Limits	
					Sample Result	Spike Recovery	Static Limits	
						MS	Low	High
EG020A-F: Dissolved Metals by ICP-MS - Suite A								
EG020F: Dissolved Metals by ICP-MS - (QC Lot: 17556)				mg/L	mg/L	%	%	%
Arsenic	EB0405710-001	- Anonymous -	0.001 mg/L	0.100	0.002	121	70	130
Barium			0.001 mg/L	0.100	0.149	85.7	70	130
Cadmium			0.0001 mg/L	0.100	<0.0001	108	70	130
Chromium			0.001 mg/L	0.100	0.012	85.6	70	130
Copper			0.001 mg/L	0.100	<0.001	101	70	130
Lead			0.001 mg/L	0.100	<0.001	99.0	70	130
Nickel			0.001 mg/L	0.100	0.002	90.9	70	130
Vanadium			0.001 mg/L	0.100	0.009	99.1	70	130
Zinc			0.001 mg/L	0.100	0.011	111	70	130
EG035F: Dissolved Mercury by FIMS								
EG035F: Dissolved Mercury by FIMS - (QC Lot: 17619)				mg/L	mg/L	%	%	%
Mercury	EB0405579-001	- Anonymous -	0.0001 mg/L	0.05	<0.0005	92.7	70	130
EP074: Volatile Organic Compounds								
EP074E: Chlorinated Aliphatic Compounds - (QC Lot: 17615)				µg/L	µg/L	%	%	%
1,1-Dichloroethene	EB0405721-002	QC06	5 µg/L	10	<5	105	70	130
Trichloroethene			5 µg/L	10	<5	97.6	70	130
EP074F: Chlorinated Aromatic Compounds - (QC Lot: 17615)				µg/L	µg/L	%	%	%
Chlorobenzene	EB0405721-002	QC06	5 µg/L	10	<5	94.9	70	130
EP080: TPH Volatiles/BTEX								
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17614)				µg/L	µg/L	%	%	%
C6 - C9 Fraction	EB0405721-002	QC06	20 µg/L	140	<20	103	80	120
EP080: BTEX - (QC Lot: 17614)				µg/L	µg/L	%	%	%
Benzene	EB0405721-002	QC06	1 µg/L	10	<1	107	80	120
Toluene			2 µg/L	10	<2	93.4	80	120



ALS Environmental

SAMPLE RECEIPT ADVICE (SRA)

Comprehensive report

Client Details

Client : URS AUSTRALIA PTY LTD
Contact : ALL RESULTS BRISBANE
Address : GPO BOX 302 BRISBANE QLD AUSTRALIA 4001

Project : MOBIL WRF
Order number : - Not provided -
C-O-C Number : - Not provided -
Site : Mobil Colmslie - Alex. HeadInd
Sampler : Paul Wybrew

E-mail : brisbane@urscorp.com
Telephone : (07)3243-2111
Facsimile : (07)3243-2199

Laboratory Details

Laboratory : ALS Environmental Brisbane
Manager : Michael Heery
Address : 32 Shand Street Stafford QLD Australia 4053

Quote number : EB20040200
Work order : EB0405722

E-mail : Michael.Heery@alsenviro.com
Telephone : 61-7-32437222
Facsimile : 61-7-32437259

Dates

Date Samples Received : 27 Sep 2004
SRA Issue Date : 27 Sep 2004
Scheduled Reporting Date : **4 Oct 2004**

Delivery Details

Mode of Delivery : Carrier. Temperature : 10 C - Ice bricks present
No. of eskies/boxes : 1 LARGE No. of samples - Received 7
Security Seal : Intact. - Analysed 4

Comments

- Samples received in appropriately pretreated and preserved containers.
- Sample(s) have been received within recommended holding times.
- Please direct any turn around / technical queries to the laboratory contact designated above.
- Please direct any queries related to sample condition / numbering / breakages to Kerry Curtain.
- Analytical work for this work order will be conducted at ALSE Brisbane.
- Sample Disposal - Aqueous (14 days), Solid (90 days) from date of completion of work order.

Disclaimer : This document contains privileged and confidential information intended only for the use of the addressee. If you are not the addressee, you are hereby notified that you must not disseminate, copy or take action of its contents. If you have received this document in error, please notify ALS immediately.

SAMPLE RECEIPT ADVICE (SRA) - continued

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405722
ALS Quote Reference : EB20040200



ALS Sample ID.	Client Sample ID - Sample Date	Requested Analysis									
		Type A1 Mobil Type A1									
EB0405722-001	Alex_SP01_A - 23 Sep 2004	●									
EB0405722-002	Alex_SP01_C - 23 Sep 2004	●									
EB0405722-003	Alex_SP01_E - 23 Sep 2004	●									
EB0405722-004	QC01 - 23 Sep 2004	●									
EB0405722-005	Alex_SP01_B - 23 Sep 2004	Sample on 'Hold' - No analysis assigned									
EB0405722-006	Alex_SP01_D - 23 Sep 2004	Sample on 'Hold' - No analysis assigned									
EB0405722-007	QC03 - 23 Sep 2004	Sample on 'Hold' - No analysis assigned									
Total(s) :		4									

RTI DL RELEASE - EIP

SAMPLE RECEIPT ADVICE (SRA) - continued

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405722
ALS Quote Reference : EB20040200



Requested Reports

● **ALL RESULTS BRISBANE**

- Certificate of Analysis (PDF)	Email	brisbane@urscorp.com
- Interpretive Quality Control Report - NEPM	Email	brisbane@urscorp.com
- Quality Control Report - NEPM	Email	brisbane@urscorp.com
- MRED Export Format	Email	brisbane@urscorp.com
- Chain of Custody Acknowledgement	Email	brisbane@urscorp.com
- Sample Receipt Advice - Comprehensive	Email	brisbane@urscorp.com

● **MR ROB STORRS**

- Certificate of Analysis (PDF)	Email	robert_storrs@urscorp.com
- Interpretive Quality Control Report - NEPM	Email	robert_storrs@urscorp.com
- Quality Control Report - NEPM	Email	robert_storrs@urscorp.com
- MRED Export Format	Email	robert_storrs@urscorp.com
- Chain of Custody Acknowledgement	Email	robert_storrs@urscorp.com
- Sample Receipt Advice - Comprehensive	Email	robert_storrs@urscorp.com
- Invoice	Email	robert_storrs@urscorp.com

● **CAROLINE ENRIGHT**

- Certificate of Analysis (PDF)	Email	caroline_enright@urscorp.com
- Interpretive Quality Control Report - NEPM	Email	caroline_enright@urscorp.com
- Quality Control Report - NEPM	Email	caroline_enright@urscorp.com
- MRED Export Format	Email	caroline_enright@urscorp.com
- Chain of Custody Acknowledgement	Email	caroline_enright@urscorp.com
- Sample Receipt Advice - Comprehensive	Email	caroline_enright@urscorp.com

Sample Container(s) / Preservation Non-Compliance Log

All comparisons are made against pretreatment/preservation AS, APHA, USEPA standards.

- **No sample container / preservation non-compliance exist.**

URS CHAIN OF CUSTODY - MOBIL GRA CONTRACT				FOR LABORATORY USE ONLY																					
ADDRESS: URS Australia Level 14, 240 Queen Street Brisbane QLD 4001		LABORATORY: ALS 32 Shand Street Stafford QLD 4053		All results to be provided in MRED format email address: rob.storrs@urscorp.com				Custody Seal? ☒ Y ☐ N ☐ NA																	
PHONE NO: (07) 3243 2111		PHONE NO: (07) 3243 7222		TURNAROUND DETAILS ☒ Standard - 5 days ☐ Non standard				COC SEQUENCE NUMBER ☒ 1 ☐ 2 ☐ 3 ☐ 4				Free ice / frozen icebricks present upon receipt? ☒ Y ☐ N													
FAX NO: (07) 3243 2199		FAX NO: (07) 3243 7269						Random Sample Temperature on Receipt 10 oC																	
URS PROJECT NO:		MOBIL WRF NO:		RELINQUISHED BY: Paul Wybrow				RECEIVED BY: K. CURTAN				RELINQUISHED BY:													
URS PM: Rob Storrs		MOBIL SITE: Mobil Comsile - Alexander Headlands		DATE: 27/9/04 TIME: 9:00				sch4p4(6) Personal information				DATE: 27/9/04 TIME: 10 am													
URS SAMPLERS: Paul Wybrow		MOBIL GRA PM: Sean Mulcair										DATE: TIME:													
COMMENTS:				(1) Caution - Samples may contain hazardous substances				** Default - TPH, BTEX, VCH and Metals (As, Ba, Cd, Cr, Cu, Hg, Ni, Pb, Vn, Zn) + OC pesticides, PCBs, Cyanide, Fluoride & additional metals (Sn, Be, Co, Mo, Se)																	
SAMPLE DETAILS				CONTAINER TYPE & PRESERVATIVE								ANALYSIS REQUIRED - mark box for each individual analyte type required													
LAB ID	SAMPLE ID	DATE dd/mm/yy (enter in text format in computer)	MATRIX (Solid / Liquid)	Liquid										Total Containers	TPH, BTEX, Pb	PAH, Speciated Phenols	VCH and Metals (As, Ba, Cd, Cr, Cu, Hg, Ni, Pb, Vn, Zn)	Metals (As, Ba, Cd, Cr, Cu, Hg, Ni, Pb, Vn, Zn, Sb, Co, Mo, Se, Sn)	TOC, diss. methane, nitrate, sulphate, ferrous/ferric iron	OC & OP Pesticides	Landfill and State EPA Specific Waste Soil Classification (see**)	Total Metals (non filtered)	GC-MS BTEX	OTHER - see comment	HOLD
				Soil Jar (G) Unpr.	40ml VOA Vial (G) HCL	1L Amber (G) Unpr.	250ml (P) HNO3	250ml (G) H2SO4	100ml (P) Unpr.	100ml (P) HCL	40ml VOA Vial (G) 1/2 full (methane)	250ml (G) H2SO4	Other:												
①	Alex_SP01_A	23/09/04	Solid	X																					
②	Alex_SP01_B	23/09/04	Solid	X																					
③	Alex_SP01_C	23/09/04	Solid	X																					
④	Alex_SP01_D	23/09/04	Solid	X																					
⑤	Alex_SP01_E	23/09/04	Solid	X																					
⑥	QC01	23/09/04	Solid	X																					
⑦	QC03	23/09/04	Solid	X																					
TOTAL																									

ALS Environmental
Brisbane
Work Order
EB0405722

 Report Version: 1.01
 Telephone : 61-7-32437222



CERTIFICATE OF ANALYSIS

Client : URS AUSTRALIA PTY LTD	Laboratory : ALS Environmental Brisbane	Page : 1 of 3
Contact : MR ROB STORRS	Contact : Michael Heery	
Address : GPO BOX 302 BRISBANE QLD AUSTRALIA 4001	Address : 32 Shand Street Stafford QLD Australia 4053	Work order : EB0405722
Project : MOBIL WRF	Quote number : EB20040200	Date received : 27 Sep 2004
Order number : - Not provided -		Date issued : 04 Oct 2004
C-O-C number : - Not provided -		
Site : Mobil Colmslie - Alex. Headlnd		
E-mail : robert_storrs@urscorp.com	E-mail : Michael.Heery@alsenviro.com	No. of samples
Telephone : (07)3243-2111	Telephone : 61-7-32437222	Received : 7
Facsimile : (07)3243-2199	Facsimile : 61-7-32437259	Analysed : 4

This final report was issued on Monday, October 4, 2004 for the ALSE work order reference EB0405722 and supersedes any previous reports with this reference. Results apply to the samples as submitted. All pages of this report have been checked and approved for release.

This report contains the following information:

- Analytical results for samples submitted
- Surrogate control limits

Work order specific comments

Poor TPH matrix spike recovery due to sample heterogeneity.

ALSE - QUALITY, SERVICE and TECHNOLOGY provided GLOBALLY



NATA Accredited Laboratory - 825

The Laboratory is accredited by the National Association of Testing Authorities, Australia. The test(s) reported herein have been performed in accordance with its scope of accreditation. This document shall not be reproduced except in full.

This document has been digitally signed by those names that appear on this report and are the authorised signatories. Digital signing has been carried out in compliance with procedures specified in 21 CFR Part 11.

Signatory

Kim McCabe
Mat Taylor
Shaun Crabb

Department

Inorganics - NATA 818 (Brisbane)
Organics - NATA 818 (Brisbane)
Inorganics - NATA 818 (Brisbane)

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405722
ALS Quote Reference : EB20040200

Page Number : 2 of 3
Issue Date : 04 Oct 2004



When moisture determination has been performed, results are reported on a dry weight basis. When a reported 'less than' result is higher than the LOR, this may be due to primary sample extracts/digestion dilution and/or insufficient sample amount for analysis. Surrogate Recovery Limits are static and based on USEPA SW846 or ALS-QW/EN38 (in the absence of specified USEPA limits).

Abbreviations: CAS number = Chemical Abstract Services number, LOR = Limit of Reporting. # Indicates a raised LOR, * Indicates failed Surrogate Recoveries.

When date(s) are shown bracketed, these have been assumed by the laboratory for process purposes.

Analytical Results

Client Sample ID :				Alex_SP01_A	Alex_SP01_C	Alex_SP01_E	QC01
Sample Matrix Type / Description :				SOIL / SOLID	SOIL / SOLID	SOIL / SOLID	SOIL / SOLID
Sample Date / Time :				23 Sep 2004 15:00	23 Sep 2004 15:00	23 Sep 2004 15:00	23 Sep 2004 15:00
Laboratory Sample ID :				EB0405722-001	EB0405722-002	EB0405722-003	EB0405722-004
Analyte	CAS number	LOR	Units				
EA055: Moisture Content							
Moisture Content (dried @ 103°C)		0.1	%	5.9	3.7	6.2	6.2
EG005T: Total Metals by ICP-AES							
Lead	7439-92-1	1	mg/kg	9	7	9	9
EP080/071: Total Petroleum Hydrocarbons							
C6 - C9 Fraction		2	mg/kg	<2	<2	<2	<2
C10 - C14 Fraction		50	mg/kg	<50	<50	<50	<50
C15 - C28 Fraction		100	mg/kg	<100	<100	<100	<100
C29 - C36 Fraction		100	mg/kg	<100	<100	<100	<100
EP080: BTEX							
Benzene	71-43-2	0.2	mg/kg	<0.2	<0.2	<0.2	<0.2
Toluene	108-88-3	0.2	mg/kg	<0.2	<0.2	<0.2	<0.2
Ethylbenzene	100-41-4	0.2	mg/kg	<0.2	<0.2	<0.2	<0.2
meta- & para-Xylene	108-38-3 106-42-3	0.2	mg/kg	<0.2	<0.2	<0.2	<0.2
ortho-Xylene	95-47-6	0.2	mg/kg	<0.2	<0.2	<0.2	<0.2
EP080S: TPH(V)/BTEX Surrogates							
1,2-Dichloroethane-D4	17060-07-0	0.1	%	84.8	91.7	87.9	89.9
Toluene-D8	2037-26-5	0.1	%	103	108	105	102
4-Bromofluorobenzene	460-00-4	0.1	%	84.7	88.9	91.6	87.0

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405722
ALS Quote Reference : EB20040200

Page Number : 3 of 3
Issue Date : 04 Oct 2004



Surrogate Control Limits

The analytical procedures used by ALS Environmental are based on established internationally-recognized procedures such as those published by the US EPA, APHA, AS and NEPM. In house procedure are employed in the absence of documented standards or by client request. The following report provides brief descriptions of the analytical procedures employed for results reported herein. Reference methods from which ALSE methods are based are provided in parenthesis.

Matrix Type: SOIL

		Surrogate Control Limits	
Method name	Analyte name	Lower Limit	Upper Limit
EP080: TPH Volatiles/BTEX			
EP080S: TPH(V)/BTEX Surrogates	1,2-Dichloroethane-D4	80	120
	Toluene-D8	81	117
	4-Bromofluorobenzene	74	121



QUALITY CONTROL REPORT

Client	: URS AUSTRALIA PTY LTD	Laboratory	: ALS Environmental Brisbane	Page	: 1 of 4
Contact	: MR ROB STORRS	Contact	: Michael Heery		
Address	: GPO BOX 302 BRISBANE QLD AUSTRALIA 4001	Address	: 32 Shand Street, Stafford QLD Australia 4053	Work order	: EB0405722
Project	: MOBIL WRF	Quote number	: EB20040200	Date received	: 27 Sep 2004
Order number	: - Not provided -			Date issued	: 04 Oct 2004
C-O-C number	: - Not provided -				
Site	: Mobil Colmslie - Alex. HeadInd				
E-mail	: robert_storrs@urscorp.com	E-mail	: Michael.Heery@alsenviro.com	No. of samples	
Telephone	: (07)3243-2111	Telephone	: 61-7-32437222	Received	: 7
Facsimile	: (07)3243-2199	Facsimile	: 61-7-32437259	Analysed	: 4

This final report was issued on Monday, October 4, 2004 for the ALSE work order reference EB0405722 and supersedes any previous reports with this reference. Results apply to the samples as submitted. All pages of this report have been checked and approved for release.

This report contains the following information:

- Laboratory Duplicates (DUP); Relative Percentage Difference (RPD) and Acceptance Limits
- Method Blank (MB) and Laboratory Control Samples (LCS); Recovery and Acceptance Limits
- Matrix Spikes (MS); Recovery and Acceptance Limits

Work order specific comments

Poor TPH matrix spike recovery due to sample heterogeneity.

ALSE - QUALITY, SERVICE and TECHNOLOGY provided GLOBALLY



NATA Accredited Laboratory - 825

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This document has been digitally signed by those names that appear on this report and are the authorised signatories. Digital signing has been carried out in compliance with procedures specified in 21 CFR Part 11.

Signatory

Kim McCabe
Mat Taylor
Shaun Crabb

Department

Inorganics - NATA 818 (Brisbane)
Organics - NATA 818 (Brisbane)
Inorganics - NATA 818 (Brisbane)

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405722
ALS Quote Reference : EB20040200

Page Number : 2 of 4
Issue Date : 04 Oct 2004



Quality Control Report - Laboratory Duplicates (DUP)

The quality control term **Laboratory Duplicate** refers to an intralaboratory split sample randomly selected from the sample batch. Laboratory duplicates provide information on method precision and sample heterogeneity.
- Anonymous - Client Sample IDs refer to samples which are not specifically part of this work order but formed part of the QC process lot. **Abbreviations:** LOR = Limit of Reporting, RPD = Relative Percent Difference.
* Indicates failed QC. The permitted ranges for the RPD of Laboratory Duplicates (relative percent deviation) are specified in ALS Method QWI-EN/38 and are dependent on the magnitude of results in comparison to the level of reporting:- Result < 10 times LOR, no limit - Result between 10 and 20 times LOR, 0% - 50% - Result > 20 times LOR, 0% - 20%

Matrix Type: SOIL

Laboratory Duplicates (DUP) Report

Laboratory Sample ID	Client Sample ID	Analyte name	LOR	Original Result	Duplicate Result	RPD
EA055-103: Moisture Content						
EA055: Moisture Content - (QC Lot: 17617)						
EB0405717-004	- Anonymous -	Moisture Content (dried @ 103°C)	0.1 %	7.8	7.0	10.3
EB0405720-005	- Anonymous -	Moisture Content (dried @ 103°C)	0.1 %	11.5	12.9	11.1
EG005T: Total Metals by ICP-AES						
EG005T: Total Metals by ICP-AES - (QC Lot: 17730)						
EB0405619-001	- Anonymous -	Lead	1 mg/kg	1	2	0.0
EB0405673-001	- Anonymous -	Lead	1 mg/kg	2	1	0.0
EP071: TPH - Semivolatile Fraction						
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17581)						
EB0405720-001	- Anonymous -	C10 - C14 Fraction	50 mg/kg	130	140	0.0
		C15 - C28 Fraction	100 mg/kg	320	350	8.6
		C29 - C36 Fraction	100 mg/kg	230	250	9.0
EB0405722-001	Alex_SP01_A	C10 - C14 Fraction	50 mg/kg	<50	<50	0.0
		C15 - C28 Fraction	100 mg/kg	<100	<100	0.0
		C29 - C36 Fraction	100 mg/kg	<100	<100	0.0
EP080: TPH Volatiles/BTEX						
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17575)						
EB0405717-001	- Anonymous -	C6 - C9 Fraction	2 mg/kg	35	33	6.3
EB0405717-001	- Anonymous -	Benzene	0.2 mg/kg	<0.2	<0.2	0.0
		Toluene	0.2 mg/kg	1.0	1.0	0.0
		Ethylbenzene	0.2 mg/kg	1.9	1.8	8.8
		meta- & para-Xylene	0.2 mg/kg	7.7	7.3	5.6
		ortho-Xylene	0.2 mg/kg	5.3	4.8	10.2

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405722
ALS Quote Reference : EB20040200

Page Number : 3 of 4
Issue Date : 04 Oct 2004



Quality Control Report - Method Blank (MB) and Laboratory Control Samples (LCS)

The quality control term **Method / Laboratory Blank** refers to an analyte free matrix to which all reagents are added in the same volumes or proportions as used in standard sample preparation. The purpose of this QC type is to monitor potential laboratory contamination. The quality control term **Laboratory Control Sample (LCS)** refers to a known, interference free matrix spiked with target analytes or certified reference material. The purpose of this QC type is to monitor method precision and accuracy independent of sample matrix. Dynamic Recovery Limits are based on statistical evaluation of actual laboratory data. Abbreviations: LOR = Limit of reporting.

* Indicates failed QC. Refer to the Summary of all QC Outliers within the Interpretive Quality Control Report.

Matrix Type: SOIL

Method Blank (MB) and Laboratory Control Samples (LCS) Report

		Method blank result	Actual Results		Recovery Limits	
			Spike concentration	Spike Recovery	Dynamic Recovery Limits	
Analyte name	LOR			LCS	Low	High
EG005T: Total Metals by ICP-AES						
EG005T: Total Metals by ICP-AES - (QC Lot: 17730)						
Lead	1 mg/kg	mg/kg <1	mg/kg 55.5	% 103	% 70	% 130
EP071: TPH - Semivolatile Fraction						
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17581)						
C10 - C14 Fraction	50 mg/kg	mg/kg <50	mg/kg 270	% 87.4	% 47	% 117
C15 - C28 Fraction	100 mg/kg	<100	434	88.0	74	132
C29 - C36 Fraction	100 mg/kg	<100	—	—	—	—
EP080: TPH Volatiles/BTEX						
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17575)						
C6 - C9 Fraction	2 mg/kg	mg/kg <2	mg/kg 26	% 94.2	% 84	% 111
EP080: BTEX - (QC Lot: 17575)						
Benzene	0.2 mg/kg	mg/kg <0.2	mg/kg 1	% 100	% 78	% 119
Toluene	0.2 mg/kg	<0.2	1	98.2	77	119
Ethylbenzene	0.2 mg/kg	<0.2	1	100	79	120
meta- & para-Xylene	0.2 mg/kg	<0.2	1	91.7	76	121
ortho-Xylene	0.2 mg/kg	<0.2	1	92.1	81	120

Client : URS AUSTRALIA PTY LTD
Project : MOBIL WRF

Work Order : EB0405722
ALS Quote Reference : EB20040200

Page Number : 4 of 4
Issue Date : 04 Oct 2004



Quality Control Report - Matrix Spikes (MS)

The quality control term **Matrix Spike (MS)** refers to an intralaboratory split sample spiked with a representative set of target analytes. The purpose of this QC type is to monitor potential matrix effects on analyte recoveries. Static Recovery Limits as per laboratory Data Quality Objectives (DQO's). 'Ideal' recovery ranges stated may be waived in the event of sample matrix interferences. - Anonymous - Client Sample IDs refer to samples which are not specifically part of this work order but formed part of the QC process lot. **Abbreviations:** LOR = Limit of Reporting, RPD = Relative Percent Difference.

* Indicates failed QC. Refer to the Summary of all QC Outliers within the Interpretive Quality Control Report.

Matrix Type: SOIL

Matrix Type: SOIL					Matrix Spike (MS) Report			
Analyte name	Laboratory Sample ID	Client Sample ID	LOR	Spike Concentration	Actual Results		Recovery Limits	
					Sample Result	Spike Recovery	Static Limits	
							MS	Low
EG005T: Total Metals by ICP-AES								
EG005T: Total Metals by ICP-AES - (QC Lot: 17730)				mg/kg	mg/kg	%	%	%
Lead	EB0405619-002	- Anonymous -	1 mg/kg	50.0	2	95.7	70	130
EP071: TPH - Semivolatile Fraction								
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17581)				mg/kg	mg/kg	%	%	%
C10 - C14 Fraction	EB0405720-002	- Anonymous -	50 mg/kg	270	<50	80.9	70	130
C15 - C28 Fraction			100 mg/kg	434	240	89.3	70	130
EP080: TPH Volatiles/BTEX								
EP080/071: Total Petroleum Hydrocarbons - (QC Lot: 17575)				mg/kg	mg/kg	%	%	%
C6 - C9 Fraction	EB0405717-002	- Anonymous -	2 mg/kg	14	46	* 39.1	70	130
EP080: BTEX - (QC Lot: 17575)				mg/kg	mg/kg	%	%	%
Benzene	EB0405717-002	- Anonymous -	0.2 mg/kg	1	<0.2	74.3	70	130
Toluene			0.2 mg/kg	1	3.6	* 55.4	70	130

Appendix B AMDEL Laboratory Data

RTI DL RELEASE - EHP

AMDEL LTD

INDUSTRIAL AND ENVIRONMENTAL SERVICES DIVISION

Amdel Limited
Correspondence to:
PO BOX 331
HUNTER REGIONAL MAIL
CENTRE NSW 2310

ABN 38 0081 27 802
99 Mitchell Rd
CARDIFF NSW 2285
Telephone: (02) 4902 4800
Facsimile: (02) 4902 4899

SAMPLE RECEIPT ACKNOWLEDGMENT

TO: *URS - Brisbane*ATTN: *Rob Storta*

FAX NO: 07 3243 2199

FROM: Client Services Cardiff

DATE: 30/09/04

PAGES: 1 of *X2*

If you have any queries or wish to make any adjustments to analyses performed, please contact this laboratory
(immediately.

Reference/Order:

Project:

Our Reference Number :

Date Received by Amdel :

MOBIL COLMSILE

ALEXANDER HEADLANDS

4N1756

30/09/04

ANALYSIS REQUESTED

AMDEL METHOD
CODENUMBER OF
SAMPLESESTIMATED
REPORT DATE (COB)

#Moisture (%w/w)

E7500

1

TPH C6-C9 by Purge & Trap

E1230

1

___ 1 Working Day

TPH (C10-C36)

E1221

1

Benzene, Toluene, Ethylbenzene & Xylene

E1010

1

___ 2 Working Days

Metals by ICP-AES

E5910

1

Samples on Hold (Soil)

E7600

1

✓ 5 Working Days

Australian GST

GST

___ Working Days

Sample integrity upon receipt

- * Samples were received chilled/chilling (refer to COC for temperature records(if space provided)).
- * Samples received in good condition and appropriately preserved for all tests.
- * VOC/SVOC samples were received in teflon lined lids.
- * VOC samples were received with Zero Headspace.
- * Samples were received in sufficient time to allow us to meet holding time requirements.

Yes / No / N/AYes / No / N/AYes / No / N/AYes / No / N/AYes / No / N/A

** We have received the samples referenced above and they are now being processed in our laboratory. Samples received after 4pm are considered as received the next working day for turnaround purposes. Surcharges for urgent turn-around requests may apply.

UNLESS ADVISED OTHERWISE - Sample analysis will be commenced regardless of integrity issues. Any non-conformance will be recorded on the final report.

ASForm. 223



ANALYTICAL SERVICES DIVISION

ABN 30 008 127 802

Correspondence to:

PO Box 331

HUNTER REGIONAL MAIL

CENTRE NSW 2310

99 Mitchell Rd

CARDIFF NSW 2285

Telephone: (02) 4902 4800

Facsimile: (02) 4902 4899

CERTIFICATE OF ANALYSIS

Contents :

1. Cover Pages (2)
2. Analysis Report Pages
3. QA/QC Appendix
4. Additional Reports - External (if applicable)
5. Chain of Custody (if applicable)

Report No. : 4N1756

Attention : Rob Storrs

Client : URS Australia Pty Ltd
: Level 14, 240 Queen Street
: BRISBANE QLD 4000

Samples : 2

Reference/Order : MOBIL COLMSILE

Project : ALEXANDER HEADLANDS

Received Samples : 30/09/04 Instructions : 30/09/04

Date Reported : 08/10/04

PLEASE SEE FOLLOWING PAGES FOR METHOD LISTING AND RESULTS

RESULTS

All samples were analysed as received. This report relates specifically to the samples as received. Results relate to the source material only to the extent that the samples as supplied are truly representative of the sample source. This report replaces any preliminary results issued. Note that for methods indicated with "#", NATA accreditation does not cover the performance of this service. Three significant figures (or 2 for <10PQL) are reported for statistical purposes only. Where "Total" concentrations are reported for organic suites of compounds this is the summation of the individual compounds and the PQL is noted for reporting purposes only. This report has been authorized by the NATA signatories listed in the method descriptions section on the following page.

sch4p4(6) Personal information

James McMahon B.Sc., Ph.D. (Chem.)
Manager - Environmental



Report No. : 4N1756

Please note: Where samples are collected/submitted over several days, the date on which the last samples were analysed or extracted is reported.

Unless Ferrous Iron is determined on site, the possibility of a ferrous-ferric ratio change may occur.

<u>Method</u>	<u>Description</u>	<u>Extracted</u>	<u>Analysed</u>	<u>Authorised</u>
E7500	#Moisture (%w/w)	01/10/04	01/10/04	MNG 096
E1230	TPH C6-C9 by Purge & Trap	30/09/04	01/10/04	GTO 094
E1221	TPH (C10-C36)	30/09/04	30/09/04	GTO 094
E1010	Benzene, Toluene, Ethylbenzene & Xylene	30/09/04	02/10/04	GTO 094
E5910	Metals by ICP-AES	06/10/04	06/10/04	DLU 093

RTI DL RELEASE - EHP



NATA Signatory

Initials Name

Sections/Methods

sch4p4(6) Personal information

093, 094, 095, 101
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RTI DL RELEASE - EHP



Job Number : 4N1756

Client : URS Australia Pty Ltd

Reference : MOBIL COLMSILE

Project : ALEXANDER HEADLANDS

Page 1 of 1

plus Cover Page

Analyte	Lab No	E144410				
		QC02				
	Sample Id	23/09/04				
	PQL					
#E7500 Moisture (%w/w) in Soil						
Moistures test performed at 105oC						
Moisture Content	1	5%				
E1230 TPH in Soil by Purge & Trap/GC-MS						
C6-C9 Fraction	5	nd				
E1221 TPH in Soil						
C10-C14 Fraction	10	nd				
C15-C28 Fraction	50	nd				
C29-C36 Fraction	50	nd				
E1010 BTEX (P&T) in Soil						
Benzene	0.2	nd				
Toluene	1	nd				
Ethylbenzene	1	nd				
m&p-Xylene	2	nd				
o-Xylene	1	nd				
4-Bromofluorobenzene-SURROGATE	1	96%				
E5910 Metals in Soil						
Lead	5	9				

PQL = Practical Quantitation Limit
LNR = Samples Listed not Received
nd = < PQL
-- = Not Applicable

Soils : mg/kg (ppm) dry weight unless otherwise specified
Waters : mg/L (ppm) unless otherwise specified in Method Header
Leachates : mg/L (ppm) in leachate unless otherwise specified in Method Header

Refer to Amdel standard laboratory qualifier codes for comments.

Release



AMDEL INTERNAL QUALITY ASSURANCE REVIEW.

Page 1

Job No. 4N1756

General

1. Laboratory QA/QC including Method Blanks, Duplicates, Matrix Spikes, Laboratory Control Samples or CRM's are included in this QA/QC appendix. (Where applicable)
2. Inter-Laboratory proficiency trial results are available upon request.
3. PQLs are matrix dependent and are increased accordingly where sample extracts are diluted due to interferences.
4. Results are uncorrected for matrix spike or surrogate recoveries.
5. Where 3 and 2 significant figures are reported for > 10x PQL and < 10x PQL respectively, the last figure is uncertain and is provided for statistical purposes only.
6. Samples duplicated or spiked are from this job only and are identified in the following QA/QC report.
7. SVOC analyses on waters are performed on homogenized, unfiltered samples, unless noted otherwise.

Maximum Holding Times for Soils, Sediments and Waters

Parameter

Holding Times

Soils

Volatile and Semi-Volatile Organic Analysis.

Extracted in 14 days, analysed within 40 days.

Metals

Extracted and analysed within 28 days-6 months.

Inorganics*

Extracted and analysed within 7-28 days.

TCLPs*

Extracted and analysed within 14 days,
(Zero Headspace-TCLP 7 days).

Waters

Volatile Organic Analysis

Analysed within 7 days (USEPA requires 14 days).

Semi-Volatile Organic Analysis

Extracted in 7 days, analysed within 40 days.

Inorganics*

Analysed within 24 hrs-28 days.

Metals (dissolved metals should be supplied field filtered)

Prepared and analysed within 28 days.

* Please refer to 'Preservation Information Chart for Soils, Sediments & Waters' for further information. (ISFORM.098). Holding times may be extended with the use of preservation bottles and/or freezing samples. Holding times can be calculated from dates reported in the body of the report. Tests clearly exceeding holding times will be noted when sufficient information is provided.
Reference: USEPA SW846 and AMDEL SPM-01 (incorporating NEPM Guidelines).

Chain of Custody and Sample Integrity

Yes/NO/NA

Chain of Custody / instructions received with samples
Custody seals were received intact, if used
Samples were received chilled and in good condition
Samples received appropriately preserved for all tests
VOC/SVOC samples were received in teflon lined containers
Samples received with Zero Headspace
Chain of Custody completed and attached (if applicable)

Yes
NA
Yes
Yes
Yes
Yes
Yes

Chromatography Calibration/Acceptance Criteria (if applicable)

Retention time window meets acceptance criteria (+/-2%)
Reference standard meets acceptance criteria (+/-10%)
Recalibration standard meets acceptance criteria (+/-15%)
Internal standard recovery acceptable.

Yes
Yes
Yes
Yes

Amdel QA/QC Compliance Assessment

Compliance

Surrogates performed on all appropriate GC analyses and meet acceptance limits (70% - 130% recovery*).

Please see body of report

Matrix Spikes performed once per process batch and at least 1 in 20 samples (Results meet acceptance limits - 70% - 130% recovery* or 80% - 120% recovery* for inorganics in water.)

Please see body of report

Laboratory Control samples performed once per process batch and at least 1 in 20 samples (Results meet acceptance limits - 70% - 130% recovery* in soil or 70%-130%/90-110% recovery* for waters.)

Yes

Laboratory Duplicate samples performed once per process batch and at least 1 in 10 samples

Yes

Laboratory duplicates meet acceptance criteria
 < 4 PQL - +/- 2 PQL
 4-10 PQL - 25-50 or 50% RPD
 > 10 PQL - 10-30 or 30% RPD

Please see body of report

Method Blanks performed once per process batch and at least 1 in 20 samples (Results not detected at the PQL).

Yes

N/A=Not Applicable.

- * Phenols 50% - 130% recovery
- * SVOCs 60% - 130% recovery
- * Phenoxy Acid Herbicides 60% - 140% recovery

QA/QC Appendix

Please refer to the following pages for the QA/QC data.
 For further information on samples or non-conformance in QC protocols please see notations in the body of the report plus comments on the following page.

Additional Comments

sch4p4(6) Personal information

James McMahon B.Sc., Ph.D. (Chem.)
Manager - Environmental



AMDEL STANDARD LABORATORY QUALIFIER CODES.

Page 3

Job NO. 4N1756

<u>Qualifier Codes</u>	<u>Description</u>
*	PQLs are raised due to matrix interference.
@	PQLs are raised due to insufficient sample provided for analysis.
\$	The mass imbalance indicates the presence of other ions not measured as part of this procedure.
nd	< PQL
--	Not applicable
LNR	The sample was listed on the COC, but not received.
IS	Insufficient sample was supplied to conduct this analysis.
AN	The analysis indicates the presences of an analyte that has been 'tentatively' identified, and the associated numerical value represents it's approximate concentration.
A	Sample results are reported on an 'as received' basis (not moisture corrected).
B	The sample was not received in a suitable timeframe to allow completion within the recommended holding time.
C	This sample was received with headspace.
D	This sample was received with the incorrect preservation for this analysis.
E	The raw data indicates the absence of 0.055g of Copper Sulphate in the sample.
F	This sample contained significant amounts of solids and was therefore analysed by settling and decanting the aqueous phase to avoid including the solid in the analysis portion.
G	This test was performed outside the recommended holding time.
H	This sample contained significant material > 5mm which was removed prior to analysis.
ISD	Insufficient sample was supplied to conduct duplicate analyses.
ISM	Insufficient sample was supplied to conduct matrix spike analyses.
W	The spike recovery is outside of the recommended acceptance criteria. An acceptable recovery was obtained for the laboratory control sample indicating a sample matrix interference.
J	The duplicate %RPD is outside the recommended acceptance criteria. Further analysis indicates sample heterogeneity as the cause.
K	The matrix spike concentration is less than five times the background concentration in the sample, and therefore the spike recovery can not be determined.
L	The surrogate recovery is outside of the recommended acceptance criteria, due to matrix interference.
M	The surrogate recovery is outside of the recommended acceptance criteria. Insufficient sample remains to perform re-analysis.
N	Results are expressed in mg/L (ppm) due to the high concentration of the analyte.
O	The results reported are 'recoverable organics' for this fraction, as the chromatogram and peak shape indicates the presence of a significant concentration of polar compounds.
P	The concentration reported is mainly due to a single peak.
Q	This samples contains volatile halogenated oxygenated or other compounds that are included and quantitated as part of TPH C6-9.
R	Theoretically the total result should be greater or equal to the dissolved concentration. However the difference reported is within the uncertainty of the individual tests.
S	The mass imbalance was equal to or less than 0.2 milli-equivalents.
T	During Kjeldahl digestion, nitrate (> 10mg/L) can oxidise ammonia resulting in a negative TKN interference, which may have occurred for this sample.
U	Theoretically the TKN result should be greater or equal to ammonia concentration. However the difference reported is within the uncertainty of the individual tests.
V	This sample contained significant amounts of sediment which was included in the analysis portion as requested.
SUR	Surrogate recoveries could not be determined due to the dilution required to quantify the analyte.

IS Form 187. (Issue Date - 19/05/03)



Job Number : 4N1756

Page 1 of 2

QAQC : Laboratory Control Sample(s)

Analyte	Level	Level Detected			Recovery Details		
		Result1	Result2	Result3	Rec 1 (%)	Rec 2 (%)	Rec 3 (%)
E1230 TPH in Soil by Purge & Trap/GC-MS							
C6-C9 Fraction	100	100			101%		
21 TPH in Soil							
C10-C14 Fraction		--					
C15-C28 Fraction	550	580			105%		
C29-C36 Fraction		--					
E1010 BTEX (P&T) in Soil							
Benzene	10	9.4			95%		
Toluene	10	10			99%		
Ethylbenzene	10	10			99%		
m&p-Xylene	20	20			100%		
o-Xylene	10	10			98%		
E5910 Metals in Soil							
Lead	50	48			96%		

PQL = Practical Quantitation Limit
-- = Not Applicable
nd = <PQL

(S) Soils : mg/kg (ppm) dry weight
(W) Waters : mg/L (ppm) unless otherwise specified



Job Number : 4N1756

Page 2 of 2

QAQC : Method Blank(s)

ANALYTE	Sample ID PQL	Blank1	Blank2	Blank3	Blank4	Blank5
E1230 TPH in Soil by Purge & Trap/GC-MS						
C6-C9 Fraction	5	nd				
E1221 TPH in Soil						(
C10-C14 Fraction	10	nd				
C15-C28 Fraction	50	nd				
C29-C36 Fraction	50	nd				
E1010 BTEX (P&T) in Soil						
Benzene	0.2	nd				
Toluene	1	nd				
Ethylbenzene	1	nd				
m&p-Xylene	2	nd				
o-Xylene	1	nd				
E5910 Metals in Soil						
Lead	5	nd				(

PQL = Practical Quantitation Limit
nd = < PQL
-- = Not Applicable

(S) Soils : mg/kg (ppm) dry weight
(W) Waters : mg/L (ppm) unless otherwise specified

Appendix C Data Quality Review

RTI DL RELEASE - EHP

DATA VALIDATION
Colmslie Landfarm Sampling

Location
Field ID
Date Sampled
Sample Type

Alex_SP01_E	Alex_SP01_E	Alex_SP01_E
Alex_SP01_E	QC01	QC02
23-Sep-04	23-Sep-04	23-Sep-04
Primary	Duplicate	Triplicate

	LOR ¹	Units				Primary vs. Duplicate	Primary vs. Triplicate	Duplicate vs. Triplicate
Moisture Content (103°C)	0.1	%		13.4	14	NA	NA	4.4%
TPH:								
C ₆ -C ₉ Fraction	2	mg/kg	<2	<2	<5	NA	NA	NA
C ₁₀ -C ₁₄ Fraction	50	mg/kg	<50	<50	<10	NA	NA	NA
C ₁₅ -C ₂₈ Fraction	100	mg/kg	<100	<100	<50	NA	NA	NA
C ₂₉ -C ₃₆ Fraction	100	mg/kg	<100	<100	<50	NA	NA	NA
BTEX:								
Benzene	0.2	mg/kg	<0.2	<0.2	<0.2	NA	NA	NA
Toluene	0.2	mg/kg	<0.2	<0.2	<1	NA	NA	NA
Ethylbenzene	0.2	mg/kg	<0.2	<0.2	<1	NA	NA	NA
meta- & para-Xylene	0.2	mg/kg	<0.2	<0.2	<2	NA	NA	NA
ortho-Xylene	0.2	mg/kg	<0.2	<0.2	<1	NA	NA	NA
Metals								
Lead	1	mg/kg	9	9	9	0.0%	0.0%	0.0%

RTI DL RELEASE - EHP

URS Australia Pty Ltd
ABN 46 000 691 690
Level 14, 240 Queen Street
Brisbane, QLD 4000 Australia
GPO Box 302, Queensland 4001
Tel: 61 7 3243 2111 • Fax: 61 7 3243 2199



ESR
**Queensland
Government**

Ref: BNE9848-4
BNE2005/2742
E/05/00644

Office of the
Minister for Environment

**Minister for Local Government
and Planning**

Minister for Women

21 MAR 2005

NOTIFIED

Mr Guyton Giles
Operations Manager
Suncoast Car Care Pty Ltd T/A Midas Maroochydore
120 Sugar Road
MAROOCHYDORE QLD 4558

Dear Mr Giles

Thank you for your letter of 11 February 2005 concerning the remediation of contamination originating from the Mobil Service Station located at 116-118 Sugar Road, Maroochydore. The Minister has asked me to reply on her behalf.

Mobil Australia Pty Ltd conducted a number of contaminated land investigations between December 2000 and July 2002 to determine the extent of petroleum hydrocarbon contaminants from a leaking fuel tank at the service station site into adjacent land. The Environmental Protection Agency (EPA) evaluated the associated reports and, in order to protect the environment from the risks posed by the hydrocarbon contamination, issued a Remediation Notice on 24 October 2002 in accordance with section 391 of the *Environmental Protection Act 1994* (EP Act).

The Notice requires that a suitably qualified and experienced contaminated land consultant supervise the remediation works and that environmental protection measures be implemented to manage environmental harm, including nuisance such as odour, dust and noise during the implementation of such works. Mobil engaged the environmental consultants, IT Environmental (Australia) Pty Ltd, to undertake the necessary works.

As you may be aware, inground monitoring wells have been installed and interlinked in the affected area, including those on the property at 120 Sugar Road of which your associated company, Giles and Pitts Pty Ltd, is the lessee. The wells are connected to a groundwater and soil vapour extraction plant to draw leaked petroleum hydrocarbon from soil and groundwater for treatment and disposal. Further work will be conducted to intercept and collect contamination on the site of origin and ongoing work is required to monitor the progress of remediation and the extent of the spread of contamination.

.../2

sch4p4(6) Personal information

s.73 irrelevant information

s.73 irrelevant information

The EPA is also aware that the majority of works, conducted on the property of which your company is the lessee, have been undertaken out of business hours. Currently, the amount of work needed on your site is minor involving groundwater sampling and well adjustments to ensure the efficient operation of the remediation equipment.

In EPA correspondence to you of 18 June 2004 and 15 February 2005, it was advised that the "matters in dispute be separated from the necessity to undertake the cleanup works". It was also advised that, in order to ensure the abatement of environmental risks from the spread of contamination, any interruption of legitimate access to address the requirements of the Notice would not be acceptable. Your company's on-going support for this position is appreciated.

The comments you have made on changes to strengthen voluntary mediation and court actions relating to disputes are noted. However, section 394 of the EP Act provides the necessary process to ensure that, in the event that there is failure to reach agreement with the parties involved, an appropriate court would decide any financial loss incurred because of work conducted by Mobil or its contractors.

The Minister thanks you for bringing this matter to her attention and hopes this information clarifies the situation. If any further information is required, please do not hesitate to contact Greg O'Brien of the Environmental Protection Agency on telephone 3224 4514.

Yours sincerely

sch4p4(6) Personal information

Marcus Toyne
Assistant Policy Advisor
(Environment)



Hon Desley Boyle MP
Member for Cairns

ARMS MODIFIED



Queensland
Government

Ref: BNE9848-4
BNE2005/3271
E/05/00932

24 MAR 2005

Minister for Environment

Minister for Local Government
and Planning

Minister for Women

Ms Fiona Simpson MP
Member for Maroochydore
Suite 1
Cnr First and Memorial Avenues
MAROOCHYDORE QLD 4558

Dear Ms Simpson

Thank you for your letter of 15 February 2005 making representation on behalf of Guyton Giles of Suncoast Car Care Pty Ltd, 120 Sugar Road, Maroochydore concerning the remediation of contamination originating from the Mobil Service Station located at 116-118 Sugar Road, Maroochydore.

Mobil Australia Pty Ltd conducted a number of contaminated land investigations between December 2000 and July 2002 to determine the extent of petroleum contaminants from a leaking fuel tank at the service station site into the adjacent land at 120 Sugar Road. The Environmental Protection Agency (EPA) evaluated the reports and, in order to protect the environment from the risks posed by the petroleum contamination, issued a Remediation Notice on 24 October 2002 in accordance with the *Environmental Protection Act 1994* (EP Act).

The Notice requires that a qualified contaminated land consultant supervise the remediation works and that environmental protection measures be implemented to manage issues such as odour, dust and noise during the works. Mobil engaged IT Environmental (Australia) Pty Ltd to undertake the necessary works.

Inground monitoring wells have been installed and interlinked in the affected area, including wells installed at the site of which the company associated with Suncoast Car Care (Giles and Pitts Pty Ltd) is the lessee. The wells draw leaked petroleum from soil and groundwater for treatment and disposal. Further work will be conducted to intercept and collect contamination on the Mobil site and ongoing work is required to monitor the progress of remediation and the extent of the spread of contamination.

s.73 irrelevant information

s.73 irrelevant information

The EPA is also aware that the majority of works, conducted on the property of which the company is the lessee, have been undertaken out of business hours. Currently, the amount of work needed on the site is minor.

.../2

sch4p4(6) Personal information

s.73 irrelevant information

s.73 irrelevant information He was also advised that, in order to ensure the decontamination of the site, any interruption of legitimate access to address the requirements of the Notice would not be acceptable. Suncoast Car Care's on-going support for this position is appreciated.

The comments Mr Giles has made on changes to strengthen voluntary mediation and court actions relating to disputes are noted. However, section 394 of the EP Act provides the necessary process to ensure that, in the event that there is failure to reach agreement between the parties involved, an appropriate court would decide any financial loss incurred because of work conducted by Mobil or its contractors.

I hope this information is of assistance when replying to your constituent.

Yours sincerely

sch4p4(6) Personal information

Desley Boyle MP
Minister for Environment
Minister for Local Government and Planning
Minister for Women

RTI DL RELEASE - EHP



**Queensland
Government**

Enquiries Greg O'Brien
Telephone (07) 32244514
Your reference
Our reference BNE9848

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

31 May 2005

Mr Guyton Giles
Midas Car Care
120 Sugar Road
Maroochydore Qld 4558

FILE COPY

Dear Mr Giles

DAMAGE TO RETAINING WALL, 116-120 SUGAR ROAD

I refer to your correspondence of 26 May 2005 regarding the movement of the retaining wall separating the premises of which your company is the lessee from the adjacent service station site.

Inspections by the EPA and the independent Third Party Reviewer have confirmed that the interception trench has been installed consequent to the Remediation Action Plan for the site. The Environmental Protection Agency (EPA) does not have any evidence of risk to the environment from the movement of the wall.

As a matter of course, the EPA has raised the movement of the wall with the environmental consultant IT Environmental (Australia) Pty Ltd. The EPA has been informed of the results of inspection of the wall movement as conducted by consulting engineers Quantec McWilliam of Maroochydore. The engineer's report states that the movement "has not impacted on the structural integrity of the wall" and that, provided the angle of recline of the wall does not increase, "the increased angle will not create any adverse effects and does not at this time need rectification".

In the circumstances, the jurisdiction of the Environmental Protection Act 1994 does not cover this issue and any claim for damages and rectification works that may ensue would be handled under a civil law action. The EPA does not keep a register of such matters, however your letter will be retained on file for reference should current site conditions change.

Yours sincerely

sch4p4(6) Personal information

Greg O'Brien
Chief Scientific Advisor Project Support

0754432046

26th May, 2005

Mr. Greg O'Brien
Environmental Protection Agency
160 Ann Street, Brisbane
Queensland, 4000

Dear Mr. Greg O'Brien

It is unfortunate that Giles and Pitts Pty Ltd has again been obligated to write to you in relation to site 116-118 Sugar Road, Maroochydore and site 120 Sugar Road, Maroochydore.

Giles and Pitts Pty Ltd has had verbal and written correspondence with IT Environmental (Australia) Pty Ltd regarding damage to property in the care of Giles and Pitts Pty Ltd during the course of the interception trench. This damage being significant and visible movement in the retaining wall bordering the two properties site 116-118 Sugar Road, Maroochydore and site 120 Sugar Road, Maroochydore. The movement poses a danger to both the leasers and patrons of site 120 Sugar Road, Maroochydore and is unsightly.

IT Environmental (Australia) Pty Ltd has made no significant effort to acknowledge or repair damage sustained during the course of the civil works prescribed in the remediation action plan.

Giles and Pitts Pty Ltd formally make a written complaint regarding this issue.

Giles and Pitts Pty Ltd respectfully request a copy of the complaints register and its' associated notification matrix.

Giles and Pitts Pty Ltd understand that once signed off by the Environmental Protection Agency decommissioning of the site will begin. Giles and Pitts Pty Ltd hold grave concerns as to Mobil Australia Pty Ltd and IT Environmental (Australia) Pty Ltd ability to uphold land owners and tenants statutory and contractual agreements.

Yours Sincerely

sch4p4(6) Personal information

*Guyton L. Giles
Operations Manager
Giles and Pitts Pty Ltd*



FACSIMILE

To: Greg O'Brien, EPA

Fax No.: 3227 7677

cc:

Fax No.:

From: Tracy Berger

Date: 31/5/05

Page 1 of: 4

Re: Engineers report for
Maroochy retaining wall.

RTI DL RELEASE EHP

Ref:

This facsimile contains CONFIDENTIAL INFORMATION which may also be LEGALLY PRIVILEGED and which is intended only for the use of the Addressee(s) named. If you are not the intended recipient of this facsimile, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this facsimile is strictly prohibited. If you received this facsimile in error, please notify us immediately by telephone and destroy the original facsimile. Thank you.

FACSIMILE TRANSMISSION

**QANTEC McWILLIAM**
consulting engineers

TO	CC	ORGANISATION	ATTENTION	FACSIMILE
✓		IT Environmental	Ms T Berger	07 3899 9692

FROM :	Karl Aldrich		
DATE :	21 April 2005		
PROJECT :	Neumanns Service Station Maroochydore		
SUBJECT :	Retaining wall movement		
PROJECT No.	02.1329	No. of Pages (including this page):	3
If all pages of this facsimile are not received, please contact us immediately on 07 54 794 666			

Copy of report regarding retaining wall movement attached

Regards

sch4p4(6) Personal information

Karl Aldrich
Structural Engineer

RTI DL RELEASE - EXP



19 April 2005

**QANTEC McWILLIAM**
consulting engineers

Ms T Berger
IT Environmental (Australia) Pty Ltd
7/20 Smallwood Place
MURARRIE QLD 4172

Dear Ms Berger

**MOVEMENT IN RETAINING WALL
NEUMANN'S SERVICE STATION
116-118 SUGAR RD MAROOCHYDORE
OUR REFERENCE: 05.N401-S07**

We were commissioned to view and report on movement that has occurred in the retaining wall that is situated on the boundary of the above site and 120 Sugar Rd Maroochydore.

Work is currently in progress on the Neumann's site, which has included the installation of two rows of sheet piling to a depth of approximately 6m and an excavation between these sheets to a depth of approximately 3.8m. The retaining wall is approximately 1.8m from the sheet piling and runs approximately parallel to the excavated trench and sheet piling.

The retaining wall is approximately 600mm to 800mm high in the effected area. A concrete driveway is located on the lower side of the wall, which had been poured against the wall.

A gap has appeared between the edge of the concrete driveway and the base of the retaining wall where it would appear that the wall has shifted back towards the trench. The gap was not evident during our pre commencement inspection of 1 April 2005.

At the widest location the gap is approximately 45mm wide between the driveway edge and the face of the wall.

Vertical joints are positioned in the wall at approximately six to eight metre centres. Each section of the wall would appear to have shifted completely with no cracking being observed in the face of the wall itself. Observations of the existing weathering effects within the vertical joints would indicate that at the joints the wall may have reclined a further 25mm at the top between adjacent sections of walling.

In our opinion this movement is most likely to have been due to deflection of the sheet piling after excavation of the trench. It is a normal characteristic of the sheet piling process that some





deflection in the sheet pile will occur during the excavation process. As the load is removed from one side during excavation the exposed face deflects marginally as the earth pressures are now only applied to one side.

In this instance it would appear that the retaining wall has moved in a similar fashion with the sheet piling and the retained earth.

In our opinion the movement of the wall has not impacted on the structural integrity of the wall. Rectification work to fill the gap with concrete should be undertaken but this should not commence until the trench has been back filled and compacted and the new service station slab has been completed. Rectification should include cleaning the gap of all loose material and dirt prior to filling.

Provided the wall does not recline any further it is our opinion that the increased angle will not create any adverse effects and does not at this time need rectification.

Regular observations of the retaining wall and surrounding area should be undertaken during the remainder of work on the trench to ensure that no further movement occurs. Should further movement be noted this office should be contacted immediately so that a further assessment of the situation can be undertaken.

Should you have any further questions regarding this matter please do not hesitate to contact this office.

Yours faithfully,

sch4p4(6) Personal information

KARL ALDRICH
Structural Engineer

Date Prepared:	9 March 2005	Prepared by:	Greg O'Brien
Approved by:	Damien Brown	Title:	Chief Scientific Advisor
Position:	Director, Environment, Southern Region	Division/Region:	Southern Region EPA
Date Approved:	15 March 2005	Telephone:	3224 4514
		Other Refs:	
		Track No:	E/05/00932

Ref: BNE9848-4
BNE2005/3271
E/05/00932

Ms Fiona Simpson MP
Member for Maroochydore
Suite 1
Cnr First and Memorial Avenues
MAROOCHYDORE QLD 4558

24 MAR 2005

CARMS MODIFIED

Dear Ms Simpson

Thank you for your letter of 15 February 2005 making representation on behalf of Guyton Giles of Suncoast Car Care Pty Ltd, 120 Sugar Road, Maroochydore concerning the remediation of contamination originating from the Mobil Service Station located at 116-118 Sugar Road, Maroochydore.

Mobil Australia Pty Ltd conducted a number of contaminated land investigations between December 2000 and July 2002 to determine the extent of petroleum contaminants from a leaking fuel tank at the service station site into the adjacent land at 120 Sugar Road. The Environmental Protection Agency (EPA) evaluated the reports and, in order to protect the environment from the risks posed by the petroleum contamination, issued a Remediation Notice on 24 October 2002 in accordance with the *Environmental Protection Act 1994* (EP Act).

The Notice requires that a qualified contaminated land consultant supervise the remediation works and that environmental protection measures be implemented to manage issues such as odour, dust and noise during the works. Mobil engaged IT Environmental (Australia) Pty Ltd to undertake the necessary works.

Inground monitoring wells have been installed and interlinked in the affected area, including wells installed at the site of which the company associated with Suncoast Car Care (Giles and Pitts Pty Ltd) is the lessee. The wells draw leaked petroleum from soil and groundwater for treatment and disposal. Further work will be conducted to intercept and collect contamination on the Mobil site and ongoing work is required to monitor the progress of remediation and the extent of the spread of contamination.

s.73 irrelevant information

s.73 irrelevant information the well installation by IT Environmental (Australia) Pty Ltd. The EPA is also aware that the majority of works, conducted on the property of which the company is the lessee, have been undertaken out of business hours. Currently, the amount of work needed on the site is minor.

.../2

In EPA correspondence to Mr Giles dated 18 June 2004 and 15 February 2005, he was advised that the "matters in dispute be separated from the necessity to undertake the cleanup works". He was also advised that, in order to ensure the decontamination of the site, any interruption of legitimate access to address the requirements of the Notice would not be acceptable. Suncoast Car Care's on-going support for this position is appreciated.

The comments Mr Giles has made on changes to strengthen voluntary mediation and court actions relating to disputes are noted. However, section 394 of the EP Act provides the necessary process to ensure that, in the event that there is failure to reach agreement between the parties involved, an appropriate court would decide any financial loss incurred because of work conducted by Mobil or its contractors.

I hope this information is of assistance when replying to your constituent.

Yours sincerely

SIGNED

**Desley Boyle MP
Minister for Environment
Minister for Local Government and Planning
Minister for Women**

RTI DL RELEASE - EHP

61 7 32258495

Date Prepared: 9 March 2005	Prepared by: Greg O'Brien Title: Chief Scientific Advisor
Approved by:	Division/Region: Integrated Assessment Branch - Environmental Operations
Position: Director, Environment - Southern Region (EPA)	Telephone: (07) 3224 4514
Date Approved:	Other Refs: BNE9848 Track No: E/05/00932

sch4p4(6) Personal information

Ref: BNE8343-6
BNE2005/2742
E/05/00932

Fiona Simpson MP
Suite 1
Cnr First and Memorial Avenues
MAROOCHYDORE QLD 4558

Dear Ms Simpson

Thank you for your letter of 15 February 2005 making representation on behalf of Mr Guyton Giles of Suncoast Car Care Pty Ltd (Suncoast Car Care), located at 120 Sugar Road, Maroochydore (the 'site') concerning the remediation of contamination originating from the Mobil Service Station located at 116 - 118 Sugar Road, Maroochydore.

Mobil Australia Pty Ltd (Mobil) conducted a number of contaminated land investigations between December 2000 and July 2002 to determine the extent of petroleum contaminants from a leaking fuel tank at the service station site into the adjacent land at 120 Sugar Road. The Environmental Protection Agency (EPA) evaluated the reports and, in order to protect the environment from the risks posed by the petroleum contamination, issued a Remediation Notice (the 'Notice') on 24 October 2002 in accordance with the *Environmental Protection Act 1994* (the EPA Act).

The Notice requires that a qualified contaminated land consultant supervise the remediation works and that environmental protection measures be implemented to manage issues such as odour, dust and noise during the works. Mobil engaged IT Environmental (Australia) Pty Ltd (IT) to undertake the necessary works.

Inground monitoring wells have been installed and interlinked in the affected area, including wells installed at the site of which the company associated with Suncoast Car Care (Giles and Pitts Pty Ltd) is the lessee. The wells draw leaked petroleum from soil and groundwater for treatment and disposal. Further work will be conducted to intercept and collect contamination on the Mobil site and ongoing work is required to monitor the progress of remediation and the extent of the spread of contamination.

s.73 irrelevant information

s.73 irrelevant information the well installation by IT. The EPA is also aware that the majority of works, conducted on the property of which the company is the lessee, have been undertaken out of business hours. At the present time the amount of work needed on the site is minor.

61 7 32258495

In EPA correspondence to Mr Giles dated 18 June 2004 and 15 February 2005, he was advised that the "matters in dispute be separated from the necessity to undertake the cleanup works". He was also advised that, in order to ensure the decontamination of the site, any interruption of legitimate access to address the requirements of the Notice would not be acceptable. Suncoast Car Care's on-going support for this position is appreciated.

The comments Mr Giles has made on changes to strengthen voluntary mediation and court actions relating to disputes are noted. However, s.394 of the EP Act provides the necessary process to ensure that, in the event that there is failure to reach agreement between the parties involved, an appropriate court would decide any financial loss incurred because of work conducted by Mobil or their contractors.

I hope this information is of assistance when replying to your constituent. Should you have any further enquiries, please contact Mr Greg O'Brien of the EPA on telephone (07) 3224 4514.

Yours sincerely

Desley Boyle MP
Minister for Environment
Minister for Local Government and Planning
Minister for Women

RTI DL RELEASE - EHP

MINISTERIAL CORRESPONDENCE

Phone: (07) 3227 8871

Fax: (07) 3227 7148



Queensland Government

Environmental Protection Agency
Queensland Parks and Wildlife Service

Ministerial Correspondence Fax Cover Sheet

DATE:

3 March 2005

TIME:

5.25pm

TO:



Director, Environment, Southern Region



Director, QPWS, Southern Region



Director, Environment, Central Region



Director, QPWS, Central Region



Director, Environment, Northern Region



Director, QPWS, Northern Region



Executive Director, Wet Tropics Management Authority

FROM:

Jacqui Tranter

TELEPHONE:

(07) 3227 8871

SUBJECT:

Ministerial BNE2005/8271

File: Bne83436

NO. OF PAGES SENT:
(INCLUDING COVER PAGE)

(6)

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CONFIDENTIAL ()

IF THERE ARE ANY PROBLEMS RECEIVING THIS FACSIMILE MESSAGE, PLEASE
CONTACT THIS OFFICE IMMEDIATELY



For info & any necessary action

Please provide the following information by the Due Date shown:



draft reply from Minister



draft reply from Senior Policy Advisor



other -

DUE DATE:

17 March 2005.

Please email your response to:

min.corr@epa.qld.gov.au

Document name should be corresp. no. shown above (eg BNE2003-xxxxx.doc)

FIONA SIMPSON MP

WORKING FOR MAROOCHYDORE

Suite 1

Cnr First and Memorial Avenues

MAROOCHYDORE QLD 4558

Phone: (07) 5443 7995

Fax: (07) 5443 7242

Email: maroochydore@parliament.qld.gov.au

Refer Bne 2005/2742.

BNE2005/3271



SHADOW MINISTER FOR TRANSPORT, MAIN ROADS, URBAN PLANNING & WOMEN'S POLICY

15 February 2005

The Hon Desley Boyle
Minister for Local Government and Planning
Minister for the Environment
PO Box 31
BRISBANE ALBERT STREET QLD 4002

OFFICE OF THE MINISTER	
REG NO. <u>E 105/00932</u>	
☒ Dept. to draft reply	
☐ Advisor to draft reply	
☐ Briefing Note	
☐ Noted. File EPA / Office	
☐ Other	
REPLY SIGNED BY: <u>MW</u>	
REPLY DUE BY:	

Dear Minister

I have received a letter from a concerned constituent in relation to a problem that has occurred due to land contamination.

As it is an issue that is quite involved I have enclosed a copy of his letter for your information.

I look forward to hearing from you once you have investigated his concerns.

Yours sincerely

sch4p4(6) Personal information

Fiona Simpson MP
Member for Maroochydore

sch4p4(6) Personal information

11.02.2005

To: The Honorable Fiona Simpson
Corner First Avenue and Memorial Avenue, Maroochydore
Qld 4558

From: Guyton Giles
Operations manager for Suncoast Car Care Pty Ltd T/A Midas Maroochydore
120 Sugar Road, Maroochydore
Qld 4558

Dear Ms Fiona Simpson

I am writing to you in regards to a severe problem that has arisen due to land contamination and neglect for the environment. In the year 2001 while Mobil Australia Pty Ltd occupied a petrol station adjacent to our leased property, a major underground fuel spill that contaminated groundwater and soil. The amount of fuel that was lost is considerable and caused extensive environmental damage.

On the 18th, January 2001 Mobil Australia entered into an access agreement with the tenants of 120 Sugar Road Maroochydore Qld. This access agreement was designed to outline Mobil Australia's commitment to not only environmental concerns but also to protect property owners and tenants affected by soil and groundwater contamination. The access agreement was only forwarded to Giles and Pitts Pty Ltd after the contamination had spread beyond the geographical boundaries of the service station and affected the land leased by Giles and Pitts Pty Ltd. As a result of this extensive contamination a remediation notice was issued to Mobil Australia Pty Ltd on 24th October 2003 by the Environmental Protection Agency. This remediation notice was given to Mobil Australia Pty Ltd to rectify the contamination as per ENVIRONMENTAL PROTECTION ACT 19.94 (EP ACT) UNDERGROUND FUEL SPILL, EXECUTION OF SECTION 391 REMEDIATION NOTICE.

Since the date work has commenced on the site (120 Sugar Road, Maroochydore) occupants have experienced continuing problems. Giles and Pitts Pty Ltd has concerns with the delays involved with facilitating a speedy resolve to complaints arising from the underground fuel spill contaminating the area relating to Mobil's occupancy of the service station and its (6) Personal property owned by 4p4(6) Personal information and occupied by Giles and Pitts Pty Ltd.

On the 23rd April, 2004 a revised access agreement was agreed to and signed by both agents for Giles and Pitts Pty Ltd and Mobil Australia Pty Ltd, the contractors for Mobil Australia "IT ENVIRONMENT (AUSTRALIA) Pty Ltd" then advised Giles and Pitts Pty Ltd as to the date of commencement of civil works required to uphold the remediation notice issued by the Environmental Protection Agency. These civil works required massive concession from Giles and Pitts Pty Ltd which were readily agreed to out of concern for the environment, the local communities health, the local estuarine system (a recent study rated the Maroochydhore river system with a category D rating) and for property in the care of Giles and Pitts Pty Ltd. These concessions involved, noise pollution, denial of access to site, unsightliness (resulting in a huge decline in customer numbers, 50%), loss of available car parking facilities, damage to property and surrounds, damage to garden beds, damage to concrete driveway, dumping of unused stock, damage to security components required to uphold the obligations set in contractual agreements for insurance underwriters.

s.73 irrelevant information

The breach in the secure compound was sustained while civil works were being conducted on behalf of Mobil Australia Pty Ltd. As per phone conversation with representatives for IT Environment (Australia) Pty Ltd on 28th May, 2004. This can be confirmed and supporting evidence can be supplied. A formal letter was sent to IT Environment (Australia) Pty Ltd and Mobil Australia Pty Ltd on the 28th May, 2004 detailing the significant financial loss suffered by Giles and Pitts Pty Ltd as a direct result of unprofessional work and site security practices. After extended and resource debilitating communications Giles and Pitts Pty Ltd was forced to send a letter of demand to IT Environment (Australia) Pty Ltd on 10th August, 2004. Considerable time passed before a reply was formulated by IT Environment (Australia) Pty Ltd. This reply was "a gesture of goodwill". Giles and Pitts Pty Ltd has never asked for goodwill or gifts all Giles and Pitts Pty Ltd is seeking is reimbursement of the significant financial loss suffered as a direct result of civil works carried out on the site 120 Sugar Road, Maroochydhore during the Mobil Australia Pty Ltd remediation process.

The access agreement signed by Mobil Australia Pty Ltd on the 18th January, 2001 clearly stipulates the obligations that Mobil Australia Pty Ltd must adhere to. As of this date 3rd January, 2005 Mobil Australia Pty Ltd has in no way shown that it will and I quote "indemnify, hold harmless and defend you from and against property damage or personal injury arising out of work performed under this agreement". There is no doubt, that as a direct result of unprofessional actions taken by Mobil Australia Pty Ltd and its contractors, a significant financial loss was suffered by Giles and Pitts Pty Ltd. This significant financial loss is for the amount of

4(7)(1)(c) Business/commercial/professional/financial affairs
sch 4(7)(1)(c) Business/commercial/professional/financial affairs

This figure relates to approximately one percent (1%) of annual turnover generated by Giles and Pitts Pty Ltd but greatly reduces the amount of available resources for continued and sustained growth.

Giles and Pitts Pty Ltd began operating automotive retail stores in Australia in 1975 during the course of business Giles and Pitts Pty Ltd has strived to maintain and grow environmentally friendly solutions for automotive applications. These include maintaining vehicles to exacting standards to reduce pollution, introduction of extensive waste reduction and recycling policies and preventative systems to reduce impact of operations on the environmental surrounds. Giles and Pitts Pty Ltd commitment to clean and sustainable operations is at the forefront of environmental sustainability.

Mobil Australia Pty Ltd in its actions has shown that it holds disdain for local businesses and community groups. Massive concessions and resources have been allocated to the remediation process by small income, low resource companies. When confronted with a valid complaint Mobil Australia Pty Ltd hides behind and uses government bodies and its vast resource base to force small income, low resource companies to submit to their will. Unfortunately the resources required to sustain a lengthy legal battle are not available to many small business and community groups. Legal argument in a court of law is the only recourse available to small income, low resource groups with the system now in place.

Mediation facilities are available but they are only voluntary and rely on commitment from both parties. Giles and Pitts Pty Ltd has supplied all evidence and requested information on questioning by agents for Mobil Australia Pty Ltd and yet no commitment, implied or written from Mobil Australia Pty Ltd has been honored. This is a slap in the face by big business, for the government maintaining and building a healthy, prosperous and sustainable economy.

Open complaints registers, qualified forced mediation facilities and direct involvement by government bodies in contract stipulations and recourse facilities would greatly improve relations between larger more resourceful companies and small local business.

Giles and Pitts Pty Ltd maintains an unerring commitment to environmental concerns and puts the completion of the remediation above all else. The significant financial loss suffered by Giles and Pitts Pty Ltd is of little consequence but the extended delay and denial of written contractual agreements will greatly influence the approach small business groups take as a course of action when communicating with larger more resourceful organizations

Yours sincerely

sch4p4(6) Personal information

Guyton Giles

Sales Manager Giles and Pitts Pty Ltd

Date Prepared:	1 March 2005	Prepared by:	Greg O'Brien
Approved by:	Damien Brown	Title:	Chief Scientific Advisor
Position:	Director, Environment, Southern Region	Division/Region:	Southern Region EPA
		Telephone:	3224 4514
Date Approved:	8 March 2005	Other Refs:	
		Track No:	E/05/00644

Ref: BNE9848-4
BNE2005/2742
E/05/00644

21 MAR 2005

Mr Guyton Giles
Operations Manager
Suncoast Car Care Pty Ltd T/A Midas Maroochydore
120 Sugar Road
MAROOCHYDORE QLD 4558

Dear Mr Giles

Thank you for your letter of 11 February 2005 concerning the remediation of contamination originating from the Mobil Service Station located at 116-118 Sugar Road, Maroochydore. The Minister has asked me to reply on her behalf.

Mobil Australia Pty Ltd conducted a number of contaminated land investigations between December 2000 and July 2002 to determine the extent of petroleum hydrocarbon contaminants from a leaking fuel tank at the service station site into adjacent land. The Environmental Protection Agency (EPA) evaluated the associated reports and, in order to protect the environment from the risks posed by the hydrocarbon contamination, issued a Remediation Notice on 24 October 2002 in accordance with section 391 of the *Environmental Protection Act 1994* (EP Act).

The Notice requires that a suitably qualified and experienced contaminated land consultant supervise the remediation works and that environmental protection measures be implemented to manage environmental harm, including nuisance such as odour, dust and noise during the implementation of such works. Mobil engaged the environmental consultants, IT Environmental (Australia) Pty Ltd, to undertake the necessary works.

As you may be aware, inground monitoring wells have been installed and interlinked in the affected area, including those on the property at 120 Sugar Road of which your associated company, Giles and Pitts Pty Ltd, is the lessee. The wells are connected to a groundwater and soil vapour extraction plant to draw leaked petroleum hydrocarbon from soil and groundwater for treatment and disposal. Further work will be conducted to intercept and collect contamination on the site of origin and ongoing work is required to monitor the progress of remediation and the extent of the spread of contamination.

.../2

s.73 irrelevant information

s.73 irrelevant information

The EPA is also aware that the majority of works, conducted on the property of which your company is the lessee, have been undertaken out of business hours. Currently, the amount of work needed on your site is minor involving groundwater sampling and well adjustments to ensure the efficient operation of the remediation equipment.

In EPA correspondence to you of 18 June 2004 and 15 February 2005, it was advised that the "matters in dispute be separated from the necessity to undertake the cleanup works". It was also advised that, in order to ensure the abatement of environmental risks from the spread of contamination, any interruption of legitimate access to address the requirements of the Notice would not be acceptable. Your company's on-going support for this position is appreciated.

The comments you have made on changes to strengthen voluntary mediation and court actions relating to disputes are noted. However, section 394 of the EP Act provides the necessary process to ensure that, in the event that there is failure to reach agreement with the parties involved, an appropriate court would decide any financial loss incurred because of work conducted by Mobil or its contractors.

The Minister thanks you for bringing this matter to her attention and hopes this information clarifies the situation. If any further information is required, please do not hesitate to contact Greg O'Brien of the Environmental Protection Agency on telephone 3224 4514.

Yours sincerely

SIGNED
Marcus Toyne
Assistant Policy Advisor
(Environment)

sch4p4(6) Personal information

sch4p4(6) Personal information 11/3/05

Date Prepared:	March 2005	Prepared by:	Greg O'Brien
Approved by:	sch4p4(6) Personal information	Title:	Chief Scientific Advisor
Position:	Director, Environment Southern Region (EPA)	Division/Region:	Integrated Assessment Branch - Environmental Operations
Date Approved:	2/3/05	Telephone:	(07) 3224 4514
		Other Refs:	BNE9848
		Track No:	E/05/80644

sch4p4(6) Personal information
sch4p4(6) Personal information 2/3/05

Ref: BNE8343-6
BNE2005/2742
E/05/80644

Mr Guyton Giles
Suncoast Car Care Ltd T/A Midas Maroochydore
120 Sugar Road
MAROOCHYDORE QLD 4558

Dear Mr Giles

The Minister has received further advice following receipt of your letter of 11 February 2005 concerning the remediation of contamination originating from the Mobil Service Station located at 116 - 118 Sugar Road, Maroochydore and has asked me to respond on her behalf.

Mobil Australia Pty Ltd (Mobil) conducted a number of contaminated land investigations between December 2000 and July 2002 to determine the extent of petroleum hydrocarbon contaminants from a leaking fuel tank at the service station site into adjacent land. The Environmental Protection Agency (EPA) evaluated the associated reports and, in order to protect the environment from the risks posed by the hydrocarbon contamination, issued a Remediation Notice (the Notice) on 24 October 2002 in accordance with s.391 of the *Environmental Protection Act 1994* (the EPA Act).

The Notice requires that a suitably qualified and experienced contaminated land consultant supervise the remediation works and that environmental protection measures be implemented to manage environmental harm, including nuisance such as odour, dust and noise during the implementation of such works. Mobil engaged the environmental consultants IT Environmental (Australia) Pty Ltd (IT) to undertake the necessary works.

As you may be aware, inground monitoring wells have been installed and interlinked in the affected area including those on the property at 120 Sugar Road of which your associated company Giles and Pitts Pty Ltd is the lessee. The wells are connected to a groundwater and soil vapour extraction plant to draw leaked petroleum hydrocarbon from soil and groundwater for treatment and disposal. Further work will be conducted to intercept and collect contamination on the site of origin and ongoing work is required to monitor the progress of remediation and the extent of the spread of contamination.

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The comments you have made on changes to strengthen voluntary mediation and court actions relating to disputes are noted. However, s.394 of the EP Act provides the necessary process to ensure that, in the event that there is failure to reach agreement with the parties involved, an appropriate court would decide any financial loss incurred because of work conducted by Mobil or their contractors.

The Minister thanks you for bringing this matter to her attention and trusts this information clarifies the situation. Should you have any further enquiries, please contact Mr Greg O'Brien of the EPA on telephone (07) 3224 4514.

Yours sincerely

Ross MacLeod
Senior Policy Advisor
(Environment)

Nick Heath
Policy Advisor
(Environment)

Marcus Toyne
Assistant Policy Advisor
(Environment)

MINISTERIAL CORRESPONDENCE

Phone: (07) 3227 8871

Fax: (07) 3227 7148



Queensland Government

Environmental Protection Agency
Queensland Parks and Wildlife Service

Ministerial Correspondence Fax Cover Sheet

DATE:

24 Feb 2005

TIME:

9.30am

TO:



Director, Environment, Southern Region



Director, QPWS, Southern Region



Director, Environment, Central Region



Director, QPWS, Central Region



Director, Environment, Northern Region



Director, QPWS, Northern Region



Executive Director, Wet Tropics Management Authority

FROM:

Jacqui Tranter

TELEPHONE:

(07) 3227 8871

SUBJECT:

Ministerial BNE2005/2742

File: Bne 8343-6

NO. OF PAGES SENT:
(INCLUDING COVER PAGE)

(4) 5

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IF THERE ARE ANY PROBLEMS RECEIVING THIS FACSIMILE MESSAGE, PLEASE
CONTACT THIS OFFICE IMMEDIATELY



For info & any necessary action

Please provide the following information by the Due Date shown:



draft reply from Minister



draft reply from Senior Policy Advisor



other -

DUE DATE: 9 March 2005

Please email your response to:

min.corr@epa.qld.gov.au

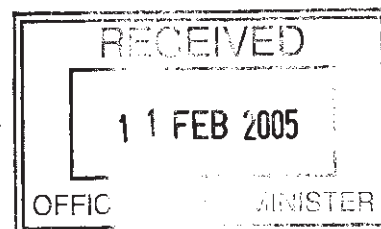
Document name should be corresp. no. shown above (eg BNE2003-xxxxx.doc)

BNE2005/2742

EER

11-2-2005

To: The Honorable Desley Boyle
Minister for Environment, Local Government, Planning and Women
P.O Box 15031, City East
Qld 4002



From: Guyton Giles
Operations manager for Suncoast Car Care Pty Ltd T/A Midas Maroochydore
120 Sugar Road, Maroochydore
Qld 4558

Dear Ms Desley Boyle

I am writing to you in regards to a severe problem that has arisen due to land contamination and neglect for the environment. In the year 2001 while Mobil Australia Pty Ltd occupied a petrol station adjacent to our leased property, a major underground fuel spill contaminated groundwater and soil. The amount of fuel that was lost is extensive and caused considerable environmental damage.

On the 18th, January 2001 Mobil Australia entered into an access agreement with the tenants of 120 Sugar Road Maroochydore Qld. This access agreement was designed to outline Mobil Australia's commitment to not only environmental concerns but also to protect property owners and tenants affected by soil and groundwater contamination. The access agreement was only forwarded to Giles and Pitts Pty Ltd after the contamination had spread beyond the geographical boundaries of the service station and affected the land leased by Giles and Pitts Pty Ltd. As a result of this extensive contamination a remediation notice was issued to Mobil Australia Pty Ltd on 24th October 2003 by the Environmental Protection Agency. This remediation notice was given to Mobil Australia Pty Ltd to rectify the contamination as per ENVIRONMENTAL PROTECTION ACT 19.94 (EP ACT) UNDERGROUND FUEL SPILL, EXECUTION OF SECTION 391 REMEDIATION NOTICE.

Since the date work has commenced on the site (120 Sugar Road, Maroochydore) occupants have experienced continuing problems. Giles and Pitts Pty Ltd has concerns with the delays involved with facilitating a speedy resolve to complaints arising from the underground fuel spill contaminating the area relating to Mobil's occupancy of the service station and its adjacent property owned by 4p4(6) Personal information and occupied by Giles and Pitts Pty Ltd.

OFFICE OF THE MINISTER	
REG No. <u>E 105/100644</u>	
☒ Dept. to draft reply	
☐ Advisor to draft reply	
☐ Briefing Note	
☐ Noted. File EPA / Office	
☐ Other	
REPLY SIGNED BY: <u>4p4(6) Personal information</u>	
REPLY DUE BY:	

On the 23rd April, 2004 a revised access agreement was agreed to and signed by both agents for Giles and Pitts Pty Ltd and Mobil Australia Pty Ltd, the contractors for Mobil Australia "IT ENVIRONMENT (AUSTRALIA) Pty Ltd" then advised Giles and Pitts Pty Ltd as to the date of commencement of civil works required to uphold the remediation notice issued by the Environmental Protection Agency. These civil works required massive concession from Giles and Pitts Pty Ltd which were readily agreed to out of concern for the environment, the local communities health, the local estuarine system (a recent study rated the Maroochydhore river system with a category D rating) and for property in the care of Giles and Pitts Pty Ltd. These concessions involved, noise pollution, denial of access to site, unsightliness (resulting in a huge decline in customer numbers, 50%), loss of available car parking facilities, damage to property and surrounds, damage to garden beds, damage to concrete driveway, dumping of unused stock, damage to security components required to uphold the obligations set in contractual agreements for insurance underwriters.

s.73 irrelevant information

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Yours sincerely

sch4p4(6) Personal information

Guyton Giles

Sales Manager Giles and Pitts Pty Ltd

Fax



Queensland Government

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

To: Andrew Howard

Fax: 54438942

From: Greg O'Brien

Telephone: 32244514

Fax:

E-mail:

Date: 18/5/05

Pages: 5 (including this page)

Subject: FORMER MOBIL 118-120 SUGAR RD Alex Headland.

☐ **URGENT**

☐ **CONFIDENTIAL**

Privacy and confidentiality notice

The information contained in this facsimile is intended for the named recipient/s only. It may contain privileged and confidential information and if you are not an intended recipient, you must not copy, distribute or take any action in reliance on it. If you have received this facsimile in error, please notify the sender.

RTI DL RELEASE - SUP

FAXED

**IT Environmental (Australia) Pty Ltd**

ABN 89 003 931 057

Unit 7, 20 Smallwood Place
Murarrie QLD 4172

Telephone: 61 7 3899 8359

Facsimile: 61 7 3899 9692

A Member of The IT Group

www.theitgroup.com.au

Quality
Endorsed
CompanyISO 9001
Lic. QEC 11845

14 April 2005

Reference: J208137E-L12

Giles and Pitts Pty Ltd
120 Sugar Road
Maroochydore QLD**Attention: Mr. Guyton Giles**

Dear Mr. Giles

RE: Your Letter of 13 April 2005

IT Environmental refers to your letter of 13 April 2005 and specific issues raised regarding the excavation and installation of our interception trench, as required by the EPA-approved Remediation Action Plan (RAP) for this site.

The excavation of the trench commenced on 12 April 2005. Works prior to that were related to installation of sheet piles for shoring to allow excavation. A dilapidation survey was undertaken by an independent structural engineer prior to the shoring installation, per our fax to you dated 29 March 2005. During the dilapidation survey the engineer instructed you to contact him immediately should you have any concerns regarding structural issues during the shoring installation.

The entire duration of the trench installation works was to be completed in less than two weeks, with soil excavation accounting for about half of that time. However, due to latent site conditions, the shoring installation works have taken substantially longer than anticipated, thus prolonging the entire program. It is certainly our intention to complete the works in as timely a manner as possible. Assuming no further delays are encountered, the soil excavation should be completed by 20 April.

sch3(10)(1)(b) Confidential source of information

As detailed in our RAP, IT has implemented various measures to manage odour, among other potential environmental impacts. These measures include the following.

- Air monitoring using a photoionisation detector (PID), explosimeter, and oxygen analyser. Air monitoring locations are not fixed, as it is important to monitor the breathing zone of onsite workers, as well as upwind and downwind locations during works. Indeed, when you were watching site works on 13 April, you would have noticed myself and other IT personnel moving around the works area and site boundaries with air monitoring equipment. None of our readings to date have recorded levels of vapours that would, on comparison with published time weighted averages (TWAs) or short term exposure levels (STELs), trigger any modification in work practices or upgrades to personnel protective equipment. Our site supervisor, Darren Marston, and Project Manager, Julie McDowell have (in onsite discussions with you) offered to carry out air monitoring on your property at any time during our trench installation works, if



you had concerns. So far I have not had any indication that you have requested such monitoring.

- Offsite disposal of contaminated soil the same day as excavated, under EPA-issued permit. Unfortunately there is no way to get around the need to excavate contaminated soil to install the interception trench. To minimise the amount of time contaminated soil is onsite, we have arranged with the nominated licensed landfill (and our EPA permit) to have soil collected and disposed the same day it is excavated. We had originally wanted to excavate outside of normal working hours, but unfortunately the landfill cannot accept soil outside of normal working hours due to its own license conditions.
- Use of spray-on odourcide (trade name "Triple 7") for soil stockpiled and awaiting offsite removal. The aim is to have soil stockpiled onsite for as little time as possible; the average turnaround between truck runs to the landfill is 4 to 5 hours. As a further contingency, soil stockpiles can be covered with mulch and/or tarpaulins until disposed, should air monitoring indicate that need. So far, it has not.

On 13 April 2005 the EPA (Mr. Andrew Howard and another representative of the Maroochydhore office) and a representative of the Third Party Reviewer inspected the site at 116-118 Sugar Road. All parties have indicated to us that our management of odours and all other workplace health and safety issues are adequate.

If you have independent air monitoring results that indicate levels of the contaminants of concern in excess of published limits, we would appreciate you providing those to us.

We trust this addresses the concerns raised in your letter of 13 April 2005.

Yours Sincerely

IT ENVIRONMENTAL (AUSTRALIA) PTY LTD

sch4p4(6) Personal information

Tracy Berger
State Manager, QLD/NT

cc:

Mr. Sean Mulcair, Mobil Oil Australia Pty Ltd

Mr. John Porter, Porter Davies Lawyers

Ms. Genevieve Alexander, ARIA Property Group

Mr. Greg O'Brien, QLD EPA

IT ENVIRONMENTAL BRI 6

IT

13th April, 2005

IT Environmental (Australia) Pty Ltd
Unit 7, 20 Smallwood Place
Murarie Qld, 4127

Dear Tracy

As described in previous documents, Giles and Pitts Pty Ltd has grave concerns as to your companies ability to remediate site 120 Sugar Road, Maroochydore, from The Contaminated Land Register in a manner that upholds land owners and tenants legal contractual and statutory rights.

Giles and Pitts Pty Ltd has conveyed to your company, on several occasions, our concerns with odour, dust and noise pollution. Your company IT Environmental (Australia) Pty Ltd has still failed to respond to both verbal and written correspondence in a manner that portrays a concern for your partners in, the remediation process of site 120 Sugar Road, Maroochydore from The Contaminated Land Register. Giles and Pitts Pty Ltd refer you to our letter dated 31st March, 2005 and verbal discussions with representatives from your company on 1st April, 2005 and 12th April, 2005.

Discussions and correspondence with agents for The Environmental Protection Agency, The Department of Public Health, The Chemical Hazards Unit, The Minister for the Environment (The Honorable Desley Boyle), Mr. Marcus Tpyne (Assistant Policy Advisor Environment), The Poison Centre, Queensland Workplace Health and Safety and related professionals maintain a position that extended periods of exposure to hydrocarbon odour pollution can and will cause debilitating effects on normal operation of human functions.

The extended and debilitating excavation of the remediation membrane trench at site 116-118 Sugar Road, Maroochydore, has caused significant odour pollution. This has significantly impacted on the continued sustainable operation of the site 120 Sugar Road, Maroochydore. Your company has failed to install sufficient practices that will minimize impact to surrounding operations.

.....2

Testing equipment for odours related to the remediation of site 116-118 Sugar Road, Maroochydore, has been placed in a position that does not directly relate to prevailing winds and vapour density attributes. Giles and Pitts Pty Ltd implore your company IT Environmental (Australia) Pty Ltd to consider the health and well being of the adjacent and neighboring properties in relation to noise, dust and odour pollution.

The immediate response and the review of your practices would greatly facilitate a amicable relationship between your company IT Environmental (Australia) Pty Ltd and your partners in the remediation process of sites listed on The Contaminated Land Register.

Giles and Pitts Pty Ltd ask that you excavate the trench outside of the operational hours prescribed in the letter dated 23rd April, 2004.

Regards

sch4p4(6) Personal information

*Guyton L. Giles
Operations Manger
Giles and Pitts Pty Ltd*

**IT Environmental (Australia) Pty Ltd**

ABN 89 003 931 057

A Subsidiary of Coffey International Limited

Unit 7, 20 Smallwood Place,

Murarrie QLD 4172

Tel: 61 7 3899 8359

Fax: 61 7 3899 9692

Email: brisbane.admin@itenviro.com.auWebsite: www.itenviro.com.au**FACSIMILE**To: **S. Reg O'Brien, EPA**Fax No.: **3227 7677**

cc:

From: **TRACY BERGER**

Fax No.:

Date: **14/4/05**Page 1 of: **5**Re: **Correspondence from / to**

sch3(10)(1)(b) Confidential source of information

sch3(10)(1)(b) Confidential source of information

RTI DL RELEASE EHP

Ref: FACSIMILE

This facsimile contains CONFIDENTIAL INFORMATION which may also be LEGALLY PRIVILEGED and which is intended only for the use of the Addressee(s) named. If you are not the intended recipient of this facsimile, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this facsimile is strictly prohibited. If you received this facsimile in error, please notify us immediately by telephone and destroy the original facsimile. Thank you.

Greg O'Brien

From: Andrew Howard [andrew.howard@epa.qld.gov.au]
Sent: Wednesday, 13 April 2005 10:59 AM
To: 'Greg O'Brien'
Cc: Elissaveth.Black@epa.qld.gov.au; Mark.Paton@epa.qld.gov.au;
Subject: RE: Fw: odour pollution

Hello Greg

Thanks for the e-mail. In response to the complaint from [Confidential source] I went out to the site (only 3kms away) yesterday at 4.15pm. I couldn't detect any odour as alleged, but I found the noise from the digging equipment very annoying. [3(10)(1)(b) Confidential source of information] hadn't been much odour during the day and that the worse time appeared to be in the morning when digging work commenced.

I've attached some photos showing the proximity of the remediation work to Midas, which does have an open workshop further down the side of their building - directly in line with the digger.

I spoke with [3(10)(1)(b) Confidential source] this morning. [3(10)(1)(b) Confidential source] has written a letter to Tracy Berger explaining relevant concerns. Work has recommenced with minimal odour nuisance at this stage. I mentioned to [3(10)(1)(b) Confidential source] that I will visit during the day, preferably when Tracy is to visit.

Regards

Andrew

-----Original Message-----

From: Greg O'Brien [mailto:greg.obrien@epa.qld.gov.au]
Sent: Wednesday, 13 April 2005 8:37 AM
To: andrew.howard@epa.qld.gov.au
Cc: Elissaveth Black; Mark Paton; Gary O'Connor
Subject: RE: Fw: odour pollution

Andrew

Late yesterday I contacted Tracy Berger State Manager of IT Environmental (38998359) and advised her of the complaint. She has advised me that the operation is being conducted under IT's protocols for the protection of the environment during site remediation. They are monitoring for odour directly and are using a PID as an additional tool and will cease work and adjust procedures if the readings exceed 10 units. They have odour suppressant on site to minimise odour impacts as required. Nevertheless, some odour always accompanies remediation. I have advised that they will need to ensure that odours are appropriately managed and that excavations are properly covered during site works. They were to have tarpaulins available on site today to cover those areas that have been excavated.

The Third Party Reviewer Mack Dreyer (URS) is in Cairns today and his representative, Willy Van Vaerenberg will visit the site today to check progress, Tracy Berger is also planning to visit the site in the middle of the day.

The interception trench is an essential component of the remediation plan under the Notice to prevent any additional migration of phase separated hydrocarbon and contaminated groundwater onto the site of which the complainant is the lessee. If the odour impacts are unacceptable, their strategies will need to be improved. The work is not being done out of hours at the moment due to direct truck loading and landfill availability.

Would appreciate your ongoing inspection and advice.

Regards

-----Original Message-----

From: Andrew Howard [mailto:andrew.howard@epa.qld.gov.au]

Sent: Tuesday, 12 April 2005 4:02 PM

To: elissaveth.black@epa.qld.gov.au

Cc: greg.obrien@epa.qld.gov.au

Subject: FW: Fw: odur pollution

Hello Liz and Greg

Please see attached.

Regards

Andrew

RTI DL RELEASE - EHP

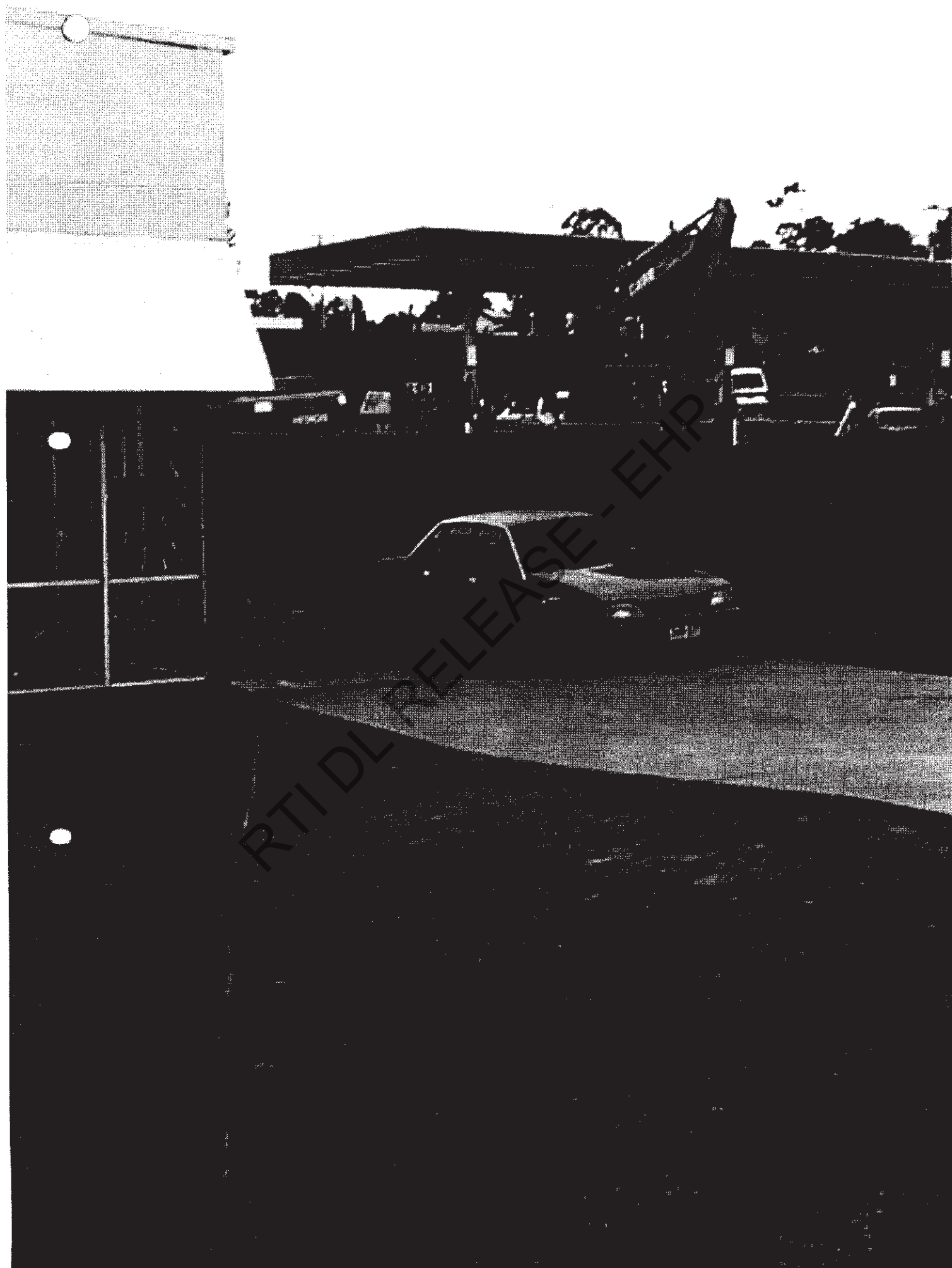






TABLE 1
UNDERGROUND STORAGE TANK DETAILS
FORMER MOBIL MAROOCHDORE SERVICE STATION (QL3815)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Tank ID	Type of Tank	Approximate Size (kL)	Product Type	Type of Construction	Status	Condition of Tank if Exposed	Date of Installation	Relative Level of Tank Bottom Invert (mAHD)	Date of Last Integrity Test	Removal or Abandonment Date	Origin of Information
T1	UST	42	Leaded	NS	In use	NS	NS	NS	NS	NA	IT
T2	UST	42	Unleaded	NS	In use	NS	NS	NS	NS	NA	IT
T3	UST	42	Unleaded	NS	In use	NS	NS	NS	NS	NA	IT
T4	UST	20	Premium ULP	NS	In use	NS	NS	NS	NS	NA	IT
T5	UST	49	Diesel	NS	In use	NS	NS	NS	NS	NA	IT
T6	UST	2	Waste Oil	NS	In use	NS	NS	NS	NS	NA	IT
T7	UST	2	Oily water	NS	In use	NS	NS	NS	NS	NA	IT

Notes:

UST = Underground Storage Tank

AGST = Above Ground Storage Tank

ULP = Unleaded Petrol

LRP = Leaded Replacement Petrol

mAHD = metres above Australia Height Datum

NS = Not Specified

NA = Not Applicable

TABLE 2
SUMMARY OF KNOWN UNDERGROUND SERVICES
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Service	Owner	Type	Approximate Depth	Manholes within 20m	Known Preferred Pathways
Telstra	Telstra	Conduit	<1.0m bgs	2	None known
Water	Maroochydore Shire Council	Conduit	<1.0m bgs	None found	None known
Fibre Optics	Reef Network	Fibre Optics	<1.0m bgs	None found	None known
Electricity	ENERGEX	Conduit	<1.0m bgs	None found	None known

RTI DL RELEASE - EHP

TABLE 3
CURRENT GROUNDWATER GAUGING RESULTS
FORMER MOBIL MAROOCHDORE SERVICE STATION (QL3815)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Well ID	Date Measured	Time Measured	Event	Top of Well Casing Elevation (mAHD)	Depth to Bottom (mbTOC)	Depth to Water* (mbTOC)	Depth to PSH* (mbTOC)	PSH Thickness (m)	Product Gravity	Hydraulic Equivalent (m)	Corrected Depth to Water (mbTOC)	Corrected Water Elevation (mAHD)	Comments
MW1	28-Jun-04	3:05	Pre	6.253	3.910	2.038					2.038	4.215	Milky brown/grey, strong hydrocarbon odour
MW2	28-Jun-04	1:25	Pre	6.085	3.780	1.787					1.787	4.298	Milky brown, strong hydrocarbon odour
MW3	28-Jun-04	12:50	Pre	5.739	3.990	1.773					1.773	3.966	Milky grey, moderate hydrocarbon odour
MW4	28-Jun-04	12:40	Pre	5.818	3.520	1.785					1.785	4.033	Milky brown, slight hydrocarbon odour
MW5	28-Jun-04		Pre	6.046	Monitoring Well Lost								
MW6	28-Jun-04	1:15	Pre	6.726	3.805	1.665					1.665	5.061	
MW7	28-Jun-04	1:10	Pre	6.379	3.950	1.523					1.523	4.856	Milky brown/grey, moderate hydrocarbon odour
MW8	28-Jun-04	11:05	Pre	6.079	3.960	1.220					1.220	4.859	Milky brown/grey, moderate hydrocarbon odour
MW9	28-Jun-04	11:00	Pre	5.892	3.955	1.700					1.700	4.192	Milky brown, moderate hydrocarbon odour
MW10	28-Jun-04	12:55	Pre	5.760	4.003	1.715					1.715	4.045	Milky brown, slight hydrocarbon odour
MW11	28-Jun-04	12:35	Pre	5.412	4.003	1.673					1.673	3.739	Milky brown, moderate hydrocarbon odour, water in gatic
MW12	28-Jun-04	12:40	Pre	5.112	3.560	1.352					1.352	3.760	Milky brown, Strong HC Odour
MW13	28-Jun-04	12:30	Pre	5.108	1.700	1.462					1.462	3.646	Dark brown, very strong hydrocarbon odour
MW14	28-Jun-04	12:05	Pre	5.243	3.155	1.515					1.515	3.728	Dark grey, moderate to strong hydrocarbon odour
MW15	28-Jun-04	12:20	Pre	5.354	4.085	1.619					1.619	3.735	Dark brown, strong hydrocarbon odour, high turbidity
MW16	28-Jun-04	12:15	Pre	5.125	3.150	1.495					1.495	3.630	Dark grey, strong hydrocarbon odour

TABLE 3
CURRENT GROUNDWATER GAUGING RESULTS
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Well ID	Date Measured	Time Measured	Event	Top of Well Casing Elevation (mAHD)	Depth to Bottom (mbTOC)	Depth to Water* (mbTOC)	Depth to PSH* (mbTOC)	PSH Thickness (m)	Product Gravity	Hydraulic Equivalent (m)	Corrected Depth to Water (mbTOC)	Corrected Water Elevation (mAHD)	Comments
MW17	28-Jun-04	12:17	Pre	4.868	3.570	1.305					1.305	3.563	Grey to milky brown, Strong hydrocarbon odour
MW18	28-Jun-04	12:25	Pre	4.944	4.450	1.438					1.438	3.506	
MW19	28-Jun-04	12:22	Pre	4.944	3.820	1.406					1.406	3.538	Dark milky brown, Strong hydrocarbon odour.
MW20	28-Jun-04	11:50	Pre	5.182	4.130	1.783					1.783	3.399	Milky grey/brown, moderate hydrocarbon odour
MW21	28-Jun-04		Pre	6.288	Monitoring Well Lost								
MW22	28-Jun-04	3:50	Pre	8.115	3.400	1.615					1.615	6.500	Clear to orange, no odour
MW23	28-Jun-04		Pre	6.057	Monitoring Well Lost								
MW24	28-Jun-04	2:55	Pre	6.743	5.087	2.690					2.690	4.053	Clear to orange, Moderate HC odour.
MW25	28-Jun-04	3:00	Pre	6.727	5.115	2.664					2.664	4.063	Light grey to clear, moderate to strong HC odour
MW26	28-Jun-04	12:00	Pre	5.362	3.390	1.840					1.840	3.522	Black to grey water, Moderate HC odour, water in gatic
MW27	28-Jun-04	11:45	Pre	5.230	4.250	1.994					1.994	3.236	Milky brown, strong HC odour
MW28	28-Jun-04	11:40	Pre	5.274	6.960	1.545					1.545	3.729	Milky light brown, no odour.
MW29	28-Jun-04	11:30	Pre	5.060	2.379	1.920					1.920	3.140	Light milky brown, moderate hydrocarbon odour
MW30	28-Jun-04	3:25	Pre	5.781	1.990	1.990					1.990	3.791	Milky grey/brown, no odour

Notes:

* below top of well casing
ID = identification

Pre = pre-purge

mAHD = metres above Australia Height Datum

m = metres

Survey Mark: Nail in concrete footpath

RL: 6.173 mAHD

Field Equipment Used: Herron IP

TABLE 4
GROUNDWATER FIELD QUALITY PARAMETERS
FORMER MOBIL MAROOCHDORE SERVICE STATION (QL3815)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Well ID	Date Measured	Time Measured	Event	Dissolved Oxygen (mg/L)	Electrical Conductivity (µS/cm)	Redox Potential (mV)	pH	Total Dissolved Solids* (mg/L)	Temperature (°C)	Purge Volume (L)	
MW1	28-Jun-04	15:05	Pre	0.8	826	-999	6.12	537	22.74	6	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW2	29-Jun-04	13:25	Pre	0.5	388	-999	6.23	252	22.76	7	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW3	29-Jun-04	12:50	Pre	0.9	478	-999	5.96	311	22.03	9	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW4	29-Jun-04	12:40	Pre	0.8	626	-999	6.36	407	24.20	5	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW5			Pre	Monitoring Well Lost							
			Post								
MW6	29-Jun-04	13:15	Pre	3.5	113	-999	5.36	73	22.50	10	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW7	28-Jun-04	13:10	Pre	1.8	175	-999	4.67	114	22.95	9	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW8	29-Jun-04	11:05	Pre	2.2	8.5	-99	5.08	6	22.57	10	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW9	29-Jun-04	11:00	Pre	0.5	277	-999	5.92	180	23.27	9	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW10	29-Jun-04	12:55	Pre	1.2	425	-99	5.01	276	22.67	8	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW11	28-Jun-04	12:33	Pre	0.8	397	-999	5.69	258	24.55	9	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW12	30-Jun-04	12:40	Pre	0.3	992	-999	5.37	645	22.34	25	
			Post	2.0	601		5.38	391	23.14		
MW13	30-Jun-04	12:30	Pre	0.4	640	-999	5.45	416	16.89	2	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW14	30-Jun-04	12:05	Pre	1.5	613	-999	5.35	398	22.92	5	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW15	28-Jun-04	12:20	Pre	0.4	893	-999	5.29	580	23.83	10	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							
MW16	30-Jun-04	12:15	Pre	1.0	1223	-999	5.32	795	23.58	5	
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters							

TABLE 4
GROUNDWATER FIELD QUALITY PARAMETERS
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Well ID	Date Measured	Time Measured	Event	Dissolved Oxygen (mg/L)	Electrical Conductivity (µS/cm)	Redox Potential (mV)	pH	Total Dissolved Solids* (mg/L)	Temperature (°C)	Purge Volume (L)
MW17	30-Jun-04	12:10	Pre	2.9	1711	-999	5.38	1142	21.04	17
			Post	2.9	1772	-999	5.40	1152	21.27	
MW18	28-Jun-04	12:20	Pre	1.1	391	-999	5.36	254	22.93	5
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters						
MW19	30-Jun-04	12:00	Pre	1.4	265	-999	5.36	172	23.76	22
			Post	0.7	266	-999	5.40	173	23.44	
MW20	30-Jun-04	11:50	Pre	1.0	564	-999	5.39	367	22.32	9
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters						
MW21			Pre	Monitoring Well Lost						
			Post							
MW22	28-Jun-04	15:50	Pre	2.2	163	-999	5.33	106	22.37	7
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters						
MW23			Pre	Monitoring Well Lost						
			Post							
MW24	29-Jun-04	14:55	Pre	0.4	391	-999	5.74	254	23.99	17
			Post	1.3	386	-999	5.77	251	24.21	
MW25	29-Jun-04	15:00	Pre	1.2	304	-999	4.64	198	24.02	26
			Post	1.0	301	-999	4.72	196	23.96	
MW26	30-Jun-04	12:00	Pre	0.2	327	-999	5.41	213	20.27	5
			Post	Insufficient Volume to Perform Post-Purge Water Quality Parameters						
MW27	30-Jun-04	11:45	Pre	1.6	628	-999	4.79	408	20.91	39
			Post	1.9	630	-999	5.04	410	21.46	
MW28	30-Jun-04	11:40	Pre	1.8	1190	-999	4.39	774	24.61	55
			Post	2.1	2193	-999	3.71	1425	24.56	
MW29	30-Jun-04	11:30	Pre	1.5	1217	-999	6.30	791	22.44	9
			Post	0.8	1154	-999	6.36	750	22.45	
MW30	29-Jun-04	15:25	Pre	1.6	901	-999	5.35	586	24.05	16
			Post	2.2	901	-999	5.39	586	24.11	

µS/cm = microsiemen per centimetre

mV = millivolts

°C = degrees Celsius

NA = not applicable

NC = not conducted

* Approximate value determined using the following equation: TDS (mg/L) = EC x 0.65

TABLE 5
HISTORICAL GROUNDWATER GAUGING RESULTS
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3816)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Well ID	Date Measured	Top of Casing Elevation (mAHD)	Depth to Water (m)	Depth to PSHs (m)	PSH Thickness (m)	Product Gravity	Hydraulic Equivalent (m)	Corrected Depth to Water (m)	Corrected Water Elevation (mAHD)
MW1	9-Jan-01	6.29	2.05						4.240
	20-Nov-01	6.29	2.54						3.747
	21-May-02	6.29	2.06						4.231
	19-Feb-03	6.29	2.07						4.222
	28-Jun-04	6.29	2.04						4.252
MW2	9-Jan-01	6.11	1.65	1.61	0.04	0.83	0.0332	1.62	4.489
	20-Nov-01	6.11	1.74	1.37	0.37	0.83	0.31042	1.43	4.674
	21-May-02	6.11	1.67						4.439
	19-Feb-03	6.11	1.69						4.418
	28-Jun-04	6.11	1.79						4.323
MW3	9-Jan-01	5.74	1.65						4.089
	20-Nov-01	5.74	1.94						3.796
	21-May-02	5.74	1.68						4.063
	19-Feb-03	5.74	1.65						4.089
	28-Jun-04	5.74	1.77						3.987
MW4	9-Jan-01	5.82	1.65						4.168
	20-Nov-01	5.82	2.01						3.806
	21-May-02	5.82	1.67						4.151
	19-Feb-03	5.82	1.77						4.047
	28-Jun-04	5.82	1.79						4.035
MW5	9-Jan-01	6.05	2.10						3.946
	20-Nov-01	6.05	2.24						3.811
	21-May-02	6.05	2.15						3.900
	19-Feb-03	6.05	2.16						3.886
	28-Jun-04	6.05	Monitoring Well Lost						
MW6	9-Jan-01	6.82	1.68	1.67	0.01	0.83	0.0083	1.67	4.374
	20-Nov-01	6.82	1.85	1.49	0.37	0.83	0.30378	1.55	5.270
	21-May-02	6.82	1.46						5.361
	19-Feb-03	6.82	1.52						5.301
	28-Jun-04	6.82	1.67						5.155
MW7	9-Jan-01	6.38	Details not provided						
	20-Nov-01	6.38	1.77						4.611
	21-May-02	6.38	1.24						5.136
	19-Feb-03	6.38	0.93						5.451
	28-Jun-04	6.38	1.52						4.857

TABLE 5
HISTORICAL GROUNDWATER GAUGING RESULTS
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3816)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Well ID	Date Measured	Top of Casing Elevation (mAHD)	Depth to Water (m)	Depth to PSHs (m)	PSH Thickness (m)	Product Gravity	Hydraulic Equivalent (m)	Corrected Depth to Water (m)	Corrected Water Elevation (mAHD)
MW8	20-Nov-01	6.08	1.83						4.445
	21-May-02	6.08	1.20						4.883
	19-Feb-03	6.08	1.20						4.876
	28-Jun-04	6.08	1.22						4.860
MW9	20-Nov-01	5.89	1.97						3.919
	21-May-02	5.89	1.59						4.301
	19-Feb-03	5.89	1.62						4.275
	28-Jun-04	5.89	1.70						4.190
MW10	20-Nov-01	5.76	1.97						3.790
	21-May-02	5.76	1.62						4.144
	19-Feb-03	5.76	1.64						4.116
	28-Jun-04	5.76	1.72						4.045
MW11	20-Nov-01	5.41	1.92						3.492
	21-May-02	5.41	1.58						3.837
	19-Feb-03	5.41	1.60						3.816
	28-Jun-04	5.41	1.67						3.737
MW12	20-Nov-01	5.87	1.83						4.037
	21-May-02	5.87	1.51						4.361
	19-Feb-03	5.87	1.50						4.370
	28-Jun-04	5.87	1.35						4.518
MW13	20-Nov-01	5.47	2.22	1.85	0.37	0.83	0.30295	1.91	3.955
	21-May-02	5.47	1.64	1.56	0.07	0.83	0.05976	1.58	3.892
	19-Feb-03	5.47	1.71	1.55	0.16	0.83	0.1328	1.57	3.896
	28-Jun-04	5.47	1.48						4.008
MW14	21-May-02	5.35	1.54						3.807
	19-Feb-03	5.35	1.56						3.795
	28-Jun-04	5.35	1.52						3.835
MW15	21-May-02	5.38	1.62						3.763
	19-Feb-03	5.38	1.65						3.735
	28-Jun-04	5.38	1.62						3.761
MW16	21-May-02	5.33	1.59						3.738
	19-Feb-03	5.33	1.60						3.728
	28-Jun-04	5.33	1.50						3.835
MW17	21-May-02	5.17	1.50	1.40	0.02	0.83	0.019	1.48	3.845
	19-Feb-03	5.17	1.42						3.746
	28-Jun-04	5.17	1.31						3.864

TABLE 5
HISTORICAL GROUNDWATER GAUGING RESULTS
FORMER MOBIL MAROOCHYDRE SERVICE STATION (QL3815)
J208137F
POST PHASE 2 ENVIRONMENTAL SITE ASSESSMENT

Well ID	Date Measured	Top of Casing Elevation (mAHD)	Depth to Water (m)	Depth to PSHs (m)	PSH Thickness (m)	Product Gravity	Hydraulic Equivalent (m)	Corrected Depth to Water (m)	Corrected Water Elevation (mAHD)
MW18	21-May-02	5.01	1.41	1.41	0.00	0.83	0.001	1.41	3.918
	19-Feb-03	5.01	1.41						3.602
	28-Jun-04	5.01	1.31						3.705
MW19	21-May-02	5.24	1.69						3.550
	19-Feb-03	5.24	1.69						3.549
	28-Jun-04	5.24	1.44						3.802
MW20	21-May-02	5.19	1.73	1.67	0.00	0.83	0.00083	1.73	3.509
	19-Feb-03	5.19	1.68						3.510
	28-Jun-04	5.19	1.78						3.407
MW21	21-May-02	6.29	0.78						5.510
	19-Feb-03	6.29	1.41						4.879
	28-Jun-04	6.29	Monitoring Well Lost						
MW22	21-May-02	8.12	0.77						7.344
	19-Feb-03	8.12	0.66						7.457
	28-Jun-04	8.12	1.62						6.505
MW23	21-May-02	6.06	1.68						4.381
	19-Feb-03	6.06	1.72						4.336
	28-Jun-04	6.06	Monitoring Well Lost						
MW24	19-Feb-03	6.66	2.61						4.056
	28-Jun-04	6.66	2.69						3.970
MW25	19-Feb-03	6.66	3.93						2.728
	28-Jun-04	6.66	2.66						3.996
MW26	19-Feb-03	5.36	1.81						3.552
	28-Jun-04	5.36	1.84						3.520
MW27	19-Feb-03	5.63	1.82						3.813
	28-Jun-04	5.63	1.99						3.636
MW28	19-Feb-03	5.27	1.55						3.721
	28-Jun-04	5.27	1.55						3.725
MW29	19-Feb-03	5.06	1.80						3.264
	28-Jun-04	5.06	1.92						3.140
MW30	19-Feb-03	5.78	1.86						3.921
	28-Jun-04	5.78	1.99						3.790

Notes:

ID = identification
mAHD = metres above Australia Height Datum
m = metres
Pre = pre-purge
PSHs = phase separated hydrocarbons

Field Equipment Used: Heron Interface Probe

TABLE 7
GROUNDWATER ANALYTICAL RESULTS
TOTAL PETROLEUM HYDROCARBONS (TPH), BTEX COMPOUNDS AND LEAD
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
J208137F
(All results in µg/L, unless specified in Notes)

Laboratory ID				0408375/016	0408375/001	0408375/002	0408375/003	0408375/004	0408375/017	0408375/005	0408375/006	0408375/007
Sample ID				MW1	MW2	MW3	MW4	MW6	MW7	MW8	MW9	MW10
Headspace (ppm _v)				-	-	-	-	-	-	-	-	-
Sample Collection Date				29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004
Sample Extraction Date				1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004
Sample Analysis Date				2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004
Comments												
Analytes	Lab Method*	LOR	Nominated Investigation Criteria									
TPH												
TPH C6 - C9	513P&T	20	NE	13000	140000	740	<LOR	79000	<LOR	98000	50	640
TPH C10 - C14	501 FID	40	NE	4600	28000	490	<LOR	18000	<LOR	6100	<LOR	<LOR
TPH C15 - C28	501 FID	100	NE	600	2200	<LOR	<LOR	700	<LOR	400	<LOR	<LOR
TPH C29 - C36	501 FID	100	NE	<LOR	600	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
TPH C10 - C36	501 FID	NA (a)	600 ⁽¹⁾	5200	30800	490	#	18700	#	6500	#	#
BTEX COMPOUNDS												
Benzene	504P&T	0.5	950 ⁽²⁾	3400	53000	580	<LOR	20000	<LOR	48000	27	<LOR
Toluene	504P&T	1	180 ⁽²⁾	3600	58000	<LOR	<LOR	30000	<LOR	35000	8	<LOR
Ethylbenzene	504P&T	1	80 ⁽²⁾	620	5000	82	<LOR	1800	<LOR	2300	1	<LOR
ortho-xylene	504P&T	1	200 ⁽²⁾	1100	6800	<LOR	<LOR	8900	<LOR	3900	2	<LOR
m,p-xylenes	504P&T	2	350 ⁽²⁾	2500	17000	110	<LOR	19000	<LOR	8300	8	<LOR
Lead	406MS	1	3.4 ⁽²⁾	<LOR	16	<LOR	<LOR	47	<LOR	<LOR	<LOR	<LOR

Notes:

MW = Permanent Groundwater Monitoring Well; QC = Quality Control Sample

"*" = See Lab Methods & Description Table

"#" = All constituent analyte concentrations are below LOR.

"-" = Analysis not requested

"m" = metres

"ppm_v" = Parts per million by volume

LOR = Limit of Reporting (= Method Detection Limit)

NE = Guideline not established

NA = Not Applicable

^(a) Where results are derived from the summation of selected analytes, LOR can not be determined.

All samples collected and analysed according to Mobil Specifications unless otherwise noted in Comments section.

Nominated Investigation Criteria:

1. Dutch Intervention Guidelines (2000) Guideline indicator for 'significant' level of impact impairing multifunctional land uses

2. Australia and New Zealand Environment and Conservation (2000) Australian Water Quality Guidelines for Protection of 95% of Species in Fresh and Marine Waters

Results

Values in highlighted cells exceed nominated investigation criteria

TABLE 7
GROUNDWATER ANALYTICAL RESULTS
TOTAL PETROLEUM HYDROCARBONS (TPH), BTEX COMPOUNDS AND LEAD
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
J208137F
(All results in µg/L, unless specified in Notes)

Laboratory ID				0408375/018	0408375/022	0408375/039	AGAL		0408375/023	0408375/024	0408375/019
Sample ID				MW11	MW12	QC12	QC12a		MW13	MW14	MW15
Headspace (ppm _v)				-	-	-	-		-	-	-
Sample Collection Date				29/06/2004	29/06/2004	29/06/2004	29/06/2004		29/06/2004	29/06/2004	29/06/2004
Sample Extraction Date				1/07/2004	1/07/2004	1/07/2004	1/07/2004		1/07/2004	1/07/2004	1/07/2004
Sample Analysis Date				2/07/2004	2/07/2004	2/07/2004	2/07/2004		2/07/2004	2/07/2004	2/07/2004
Comments											
Analytes	Lab Method*	LOR	Nominated Investigation Criteria			Field Duplicate of MW12	RPD	Field Triplicate of MW12	RPD		
TPH											
TPH C6 - C9	513P&T	20	NE	<LOR	240	220	9%	73	107%	110000	73000
TPH C10 - C14	501 FID	40	NE	<LOR	130	70	60%	<25	NA	41000	2200
TPH C15 - C28	501 FID	100	NE	<LOR	<LOR	<LOR	NA	<100	NA	4000	400
TPH C29 - C36	501 FID	100	NE	<LOR	<LOR	<LOR	NA	<100	NA	900	100
TPH C10 - C36	501 FID	NA (a)	600 ⁽¹⁾	#	130	70	60%	#	NA	45900	2700
BTEX COMPOUNDS											
Benzene	504P&T	0.5	950 ⁽²⁾	<LOR	28	19	38%	19	38%	30000	42000
Toluene	504P&T	1	180 ⁽²⁾	<LOR	<LOR	<LOR	NA	<1.0	NA	57000	17000
Ethylbenzene	504P&T	1	80 ⁽²⁾	<LOR	7	5	33%	5.6	22%	2800	1600
ortho-xylene	504P&T	1	200 ⁽²⁾	<LOR	2	2	0%	27	172%	6600	2500
m,p-xylenes	504P&T	2	350 ⁽²⁾	<LOR	35	24	37%	18	64%	13000	6900
Lead	406MS	1	3.4 ⁽²⁾	<LOR	<LOR	1	NA	<1	NA	47	<LOR

Notes:

MW = Permanent Groundwater Monitoring Well; QC = Quality Control Sample

*** = See Lab Methods & Description Table

"#" = All constituent analyte concentrations are below LOR.

"-" = Analysis not requested

"m" = metres

"ppm_v" = Parts per million by volume

LOR = Limit of Reporting (= Method Detection Limit)

NE = Guideline not established

NA = Not Applicable

^(a) Where results are derived from the summation of selected analytes, LOR can not be determined.

All samples collected and analysed according to Mobil Specifications unless otherwise noted in Comments section.

Nominated Investigation Criteria:

1. Dutch Intervention Guidelines (2000) Guideline indicator for 'significant' level of impact impairing multifunctional land uses

2. Australia and New Zealand Environment and Conservation (2000) Australian Water Quality Guidelines for Protection of 95% of Species in Fresh and Marine Waters

Results

Values in highlighted cells exceed nominated investigation criteria

TABLE 7
GROUNDWATER ANALYTICAL RESULTS
TOTAL PETROLEUM HYDROCARBONS (TPH), BTEX COMPOUNDS AND LEAD
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
J208137F
(All results in µg/L, unless specified in Notes)

Laboratory ID				0408375/025	0408375/026	0408375/020	0408375/027	0408375/028	0408375/021	0408375/008	0408375/009	0408375/029
Sample ID				MW16	MW17	MW18	MW19	MW20	MW22	MW24	MW25	MW26
Headspace (ppm _v)				-	-	-	-	-	-	-	-	-
Sample Collection Date				29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004
Sample Extraction Date				1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004
Sample Analysis Date				2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004
Comments												
Analytes	Lab Method*	LOR	Nominated Investigation Criteria									
TPH												
TPH C6 - C9	513P&T	20	NE	17000	36000	32000	32000	320	<LOR	700	50000	1800
TPH C10 - C14	501 FID	40	NE	1200	2000	6500	3300	150	<LOR	360	15000	1300
TPH C15 - C28	501 FID	100	NE	400	3000	4800	200	<LOR	<LOR	300	1400	200
TPH C29 - C36	501 FID	100	NE	<LOR	200	100	<LOR	<LOR	<LOR	<LOR	200	<LOR
TPH C10 - C36	501 FID	NA (a)	600 ⁽¹⁾	1600	5200	11400	3500	150	#	660	16600	1500
BTEX COMPOUNDS												
Benzene	504P&T	0.5	950 ⁽²⁾	8700	19000	16000	14000	170	<LOR	700	11000	150
Toluene	504P&T	1	180 ⁽²⁾	4900	9900	7200	7900	3	<LOR	<LOR	25000	270
Ethylbenzene	504P&T	1	80 ⁽²⁾	430	1200	1100	1300	6	<LOR	<LOR	1800	260
ortho-xylene	504P&T	1	200 ⁽²⁾	590	1700	1600	1700	<LOR	<LOR	<LOR	3400	290
m,p-xylenes	504P&T	2	350 ⁽²⁾	1100	3000	4100	5000	46	<LOR	<LOR	8000	840
Lead	406MS	1	3.4 ⁽²⁾	<LOR	<LOR	<LOR	<LOR	<LOR	2	8	142	<LOR

Notes:

MW = Permanent Groundwater Monitoring Well; QC = Quality Control Sample

"-" = See Lab Methods & Description Table

"#" = All constituent analyte concentrations are below LOR.

"-" = Analysis not requested

"m" = metres

"ppm_v" = Parts per million by volume

LOR = Limit of Reporting (= Method Detection Limit)

NE = Guideline not established

NA = Not Applicable

^(a) Where results are derived from the summation of selected analytes, LOR can not be determined.

All samples collected and analysed according to Mobil Specifications unless otherwise noted in Comments section.

Nominated Investigation Criteria:

1. Dutch Intervention Guidelines (2000) Guideline indicator for 'significant' level of impact impairing multifunctional land uses

2. Australia and New Zealand Environment and Conservation (2000) Australian Water Quality Guidelines for Protection of 95% of Species in Fresh and Marine Waters

Results

Values in highlighted cells exceed nominated investigation criteria

TABLE 7
GROUNDWATER ANALYTICAL RESULTS
TOTAL PETROLEUM HYDROCARBONS (TPH), BTEX COMPOUNDS AND LEAD
FORMER MOBIL MAROOCHDORE SERVICE STATION (QL3815)

J208137F

(All results in µg/L, unless specified in Notes)

Laboratory ID				0408375/030	0408375/031	0408375/032	0408375/034		AGAL	0408375/010	0408375/011
Sample ID				MW27	MW28	MW29	QC7		QC7a	MW30	QC1
Headspace (ppm _v)				-	-	-	-		-	-	-
Sample Collection Date				29/06/2004	29/06/2004	29/06/2004	29/06/2004		29/06/2004	29/06/2004	29/06/2004
Sample Extraction Date				1/07/2004	1/07/2004	1/07/2004	1/07/2004		1/07/2004	1/07/2004	1/07/2004
Sample Analysis Date				2/07/2004	2/07/2004	2/07/2004	2/07/2004		2/07/2004	2/07/2004	2/07/2004
Comments											
Analytes	Lab Method*	LOR	Nominated Investigation Criteria				Field Duplicate of MW29	RPD	Field Triplicate of MW29	RPD	Field Blank 29/06/04
TPH											
TPH C6 - C9	513P&T	20	NE	83000	<LOR	<LOR	<LOR	NA	<25	NA	<LOR
TPH C10 - C14	501 FID	40	NE	4300	<LOR	<LOR	<LOR	NA	<25	NA	<LOR
TPH C15 - C28	501 FID	100	NE	300	<LOR	<LOR	<LOR	NA	<100	NA	<LOR
TPH C29 - C36	501 FID	100	NE	<LOR	<LOR	<LOR	<LOR	NA	<100	NA	<LOR
TPH C10 - C36	501 FID	NA (a)	600 ⁽¹⁾	4600	#	#	#	NA	#	NA	#
BTEX COMPOUNDS											
Benzene	504P&T	0.5	950 ⁽²⁾	38000	<LOR	<LOR	<LOR	NA	<1.0	NA	<LOR
Toluene	504P&T	1	180 ⁽²⁾	30000	<LOR	<LOR	<LOR	NA	<1.0	NA	<LOR
Ethylbenzene	504P&T	1	80 ⁽²⁾	2500	<LOR	<LOR	<LOR	NA	<1.0	NA	<LOR
ortho-xylene	504P&T	1	200 ⁽²⁾	3900	<LOR	<LOR	<LOR	NA	<2.0	NA	<LOR
m,p-xylenes	504P&T	2	350 ⁽²⁾	9500	<LOR	<LOR	<LOR	NA	<1.0	NA	<LOR
Lead	406MS	1	3.4 ⁽²⁾	<LOR	5	<LOR	<LOR	NA	<1	NA	<LOR

Notes:

MW = Permanent Groundwater Monitoring Well; QC = Quality Control Sample

* = See Lab Methods & Description Table

= All constituent analyte concentrations are below LOR.

- = Analysis not requested

"m" = metres

"ppm_v" = Parts per million by volume

LOR = Limit of Reporting (= Method Detection Limit)

NE = Guideline not established

NA = Not Applicable

^(a) Where results are derived from the summation of selected analytes, LOR can not be determined.

All samples collected and analysed according to Mobil Specifications unless otherwise noted in Comments section.

Nominated Investigation Criteria:

1. Dutch Intervention Guidelines (2000) Guideline indicator for 'significant' level of impact impairing multifunctional land uses

2. Australia and New Zealand Environment and Conservation (2000) Australian Water Quality Guidelines for Protection of 95% of Species in Fresh and Marine Waters

Results

Values in highlighted cells exceed nominated investigation criteria

TABLE 7
GROUNDWATER ANALYTICAL RESULTS
TOTAL PETROLEUM HYDROCARBONS (TPH), BTEX COMPOUNDS AND LEAD
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
J208137F
(All results in µg/L, unless specified in Notes)

Laboratory ID				0408375/012	0408375/013	0408375/014	0408375/015	0408375/033	0408375/035	0408375/036	0408375/037	0408375/038
Sample ID				QC2	QC3	QC4	QC5	QC6	QC8	QC9	QC10	QC11
Headspace (ppm _v)				-	-	-	-	-	-	-	-	-
Sample Collection Date				29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004
Sample Extraction Date				1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004	1/07/2004
Sample Analysis Date				2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004
Comments												
Analytes	Lab Method*	LOR	Nominated Investigation Criteria	Rinsate Blank 29/06/04	Trip Blank	Trip Blank	Trip Blank	Field Blank 30/06/04	Rinsate Blank 30/06/04	Trip Blank	Trip Blank	Trip Blank
TPH												
TPH C6 - C9	513P&T	20	NE	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
TPH C10 - C14	501 FID	40	NE	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
TPH C15 - C28	501 FID	100	NE	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
TPH C29 - C36	501 FID	100	NE	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
TPH C10 - C36	501 FID	NA (a)	600 ⁽¹⁾	#	#	#	#	#	#	#	#	#
BTEX COMPOUNDS												
Benzene	504P&T	0.5	950 ⁽²⁾	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
Toluene	504P&T	1	180 ⁽²⁾	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
Ethylbenzene	504P&T	1	80 ⁽²⁾	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
ortho-xylene	504P&T	1	200 ⁽²⁾	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
m,p-xylenes	504P&T	2	350 ⁽²⁾	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
Lead	406MS	1	3.4 ⁽²⁾	<LOR	-	-	-	<LOR	<LOR	-	-	-

Notes:

MW = Permanent Groundwater Monitoring Well; QC = Quality Control Sample

"*" = See Lab Methods & Description Table

"#" = All constituent analyte concentrations are below LOR.

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^(a) Where results are derived from the summation of selected analytes, LOR can not be determined.

All samples collected and analysed according to Mobil Specifications unless otherwise noted in Comments section.

Nominated Investigation Criteria:

1. Dutch Intervention Guidelines (2000) Guideline indicator for 'significant' level of impact impairing multifunctional land uses

2. Australia and New Zealand Environment and Conservation (2000) Australian Water Quality Guidelines for Protection of 95% of Species in Fresh and Marine Waters

Results

Values in highlighted cells exceed nominated investigation criteria

TABLE 8
HISTORICAL GROUNDWATER ANALYTICAL RESULTS
TPH, BTEX AND LEAD
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
(All concentrations in µg/L, unless otherwise specified)

Sample ID	Sample Date	Comments	Total Petroleum Hydrocarbons					BTEX Compounds				Lead
			TPH	C ₆ -C ₉	C ₁₀ -C ₁₄	C ₁₅ -C ₂₈	C ₂₉ -C ₃₆	Benzene	Toluene	Ethyl benzene	Xylenes	
MW1	9-Jan-01	Handex	169450	155000	13000	1450	<LOR	35000	43000	4700	27000	7
	20-Nov-01	Handex	87614	76000	9600	1750	264	21000	28000	2500	15000	10
	21-May-02	Handex	104960	100000	4600	360	<LOR	29000	34000	3800	23600	5
	21-Feb-03	IT Environmental	88400	80000	7500	900	<LOR	21000	26000	1800	10800	2
	29-Jun-04	IT Environmental	18200	13000	4600	600	<LOR	3400	3600	620	3600	<LOR
MW2	9-Jan-01	Handex	PSH Present					PSH Present				
	20-Nov-01	Handex	PSH Present					PSH Present				
	21-May-02	Handex	244378	217000	25000	2260	118	59000	80000	8100	53000	173
	21-Feb-03	IT Environmental	149830	110000	37000	2200	630	38000	42000	36000	22700	44
	29-Jun-04	IT Environmental	170800	140000	28000	2200	600	53000	58000	5000	23800	16
MW3	9-Jan-01	Handex	3040	2900	140	<LOR	<LOR	1600	390	37	210	<LOR
	20-Nov-01	Handex	1340	1300	40	<LOR	<LOR	860	140	32	100	<LOR
	21-May-02	Handex	800	660	140	<LOR	<LOR	370	89	22	84	32
	21-Feb-03	IT Environmental	5790	5600	190	<LOR	<LOR	3100	1100	140	760	<LOR
	29-Jun-04	IT Environmental	1230	740	490	<LOR	<LOR	580	<LOR	62	110	<LOR
MW4	9-Jan-01	Handex	120	120	<LOR	<LOR	<LOR	9	6	<LOR	4	<LOR
	20-Nov-01	Handex	90	90	<LOR	<LOR	<LOR	3	2	<LOR	<LOR	<LOR
	21-May-02	Handex	100	50	50	<LOR	<LOR	3	<LOR	<LOR	3	2
	21-Feb-03	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	2.6	2	<LOR	<LOR	<LOR
	29-Jun-04	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
MW5	9-Jan-01	Handex	3360	3100	260	<LOR	<LOR	1000	420	130	670	<LOR
	20-Nov-01	Handex	10360	10000	360	<LOR	<LOR	9	38	130	600	<LOR
	21-May-02	Handex	3470	3400	70	<LOR	<LOR	2000	240	150	660	<LOR
	21-Feb-03	IT Environmental	2360	2200	160	<LOR	<LOR	1500	280	61	347	<LOR
MW6	9-Jan-01	Handex	PSH Present					PSH Present				
	20-Nov-01	Handex	PSH Present					PSH Present				
	21-May-02	Handex	1462668	1380000	69000	13300	368	33000	51000	4900	39000	168
	21-Feb-03	IT Environmental	97500	59000	32000	5400	1100	16000	21000	2000	16600	70
	29-Jun-04	IT Environmental	97700	79000	18000	700	<LOR	20000	30000	1800	27900	47
MW7	20-Nov-01	Handex	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	21-May-02	Handex	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	1
	21-Feb-03	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	29-Jun-04	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR

TABLE 8
HISTORICAL GROUNDWATER ANALYTICAL RESULTS
TPH, BTEX AND LEAD
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
(All concentrations in µg/L, unless otherwise specified)

Sample ID	Sample Date	Comments	Total Petroleum Hydrocarbons					BTEX Compounds				Lead
			TPH	C ₆ -C ₉	C ₁₀ -C ₁₄	C ₁₅ -C ₂₈	C ₂₉ -C ₃₆	Benzene	Toluene	Ethyl benzene	Xylenes	
MW8	20-Nov-01	Handex	1100	820	280	<LOR	<LOR	340	42	77	210	<LOR
	21-May-02	Handex	10600	9300	1300	<LOR	<LOR	4600	510	810	2410	<LOR
	21-Feb-03	IT Environmental	9400	8200	1200	<LOR	<LOR	3200	1300	340	1600	1
	29-Jun-04	IT Environmental	104500	98000	6100	400	<LOR	48000	35000	2300	12200	<LOR
MW9	20-Nov-01	Handex	220	180	40	<LOR	<LOR	25	38	8	53	<LOR
	21-May-02	Handex	420	420	<LOR	<LOR	<LOR	290	1	5	26	13
	21-Feb-03	IT Environmental	2600	2600	<LOR	<LOR	<LOR	820	160	37	121	<LOR
	29-Jun-04	IT Environmental	50	50	<LOR	<LOR	<LOR	27	8	1	10	<LOR
MW10	20-Nov-01	Handex	300	220	80	<LOR	<LOR	92	61	15	100	<LOR
	21-May-02	Handex	90	90	<LOR	<LOR	<LOR	53	9	<LOR	<LOR	13
	21-Feb-03	IT Environmental	49	49	<LOR	<LOR	<LOR	23	9	2	11	<LOR
	29-Jun-04	IT Environmental	640	640	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
MW11	20-Nov-01	Handex	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	21-May-02	Handex	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	21-Feb-03	IT Environmental	30	30	<LOR	<LOR	<LOR	9	8	3	11	<LOR
	29-Jun-04	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
MW12	20-Nov-01	Handex	60	60	<LOR	<LOR	<LOR	1	6	<LOR	18	<LOR
	21-May-02	Handex	60	60	<LOR	<LOR	<LOR	1	6	<LOR	18	<LOR
	21-Feb-03	IT Environmental	190	190	<LOR	<LOR	<LOR	44	82	8	55	<LOR
	29-Jun-04	IT Environmental	370	240	130	<LOR	<LOR	28	<LOR	7	37	<LOR
MW13	20-Nov-01	Handex	PSH Present					PSH Present				
	21-May-02	Handex										
	21-Feb-03	IT Environmental										
	29-Jun-04	IT Environmental	155900	110000	41000	4000	900	30000	57000	2800	19600	47
MW14	21-May-02	Handex	48400	46000	2400	<LOR	<LOR	20000	10000	1900	9700	15
	21-Feb-03	IT Environmental	34800	33000	1800	<LOR	<LOR	16000	7400	1100	6100	<LOR
	29-Jun-04	IT Environmental	75700	73000	2200	400	100	42000	17000	1600	9400	<LOR
MW15	21-May-02	Handex	28400	27000	1400	<LOR	<LOR	21000	3300	1600	8600	13
	21-Feb-03	IT Environmental	33700	32000	1700	<LOR	<LOR	19000	4800	1100	5800	4
	29-Jun-04	IT Environmental	33100	31000	1800	300	<LOR	23000	540	1100	5400	<LOR
MW16	21-May-02	Handex	30100	29000	1100	<LOR	<LOR	11000	9100	910	4800	12
	21-Feb-03	IT Environmental	3450	8300	150	<LOR	<LOR	3900	2500	220	1090	<LOR
	29-Jun-04	IT Environmental	18600	17000	1200	400	<LOR	8700	4900	430	1690	<LOR

TABLE 8
HISTORICAL GROUNDWATER ANALYTICAL RESULTS
TPH, BTEX AND LEAD
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
 (All concentrations in µg/L, unless otherwise specified)

Sample ID	Sample Date	Comments	Total Petroleum Hydrocarbons					BTEX Compounds				Lead
			TPH	C ₆ -C ₈	C ₁₀ -C ₁₄	C ₁₅ -C ₂₈	C ₂₉ -C ₃₆	Benzene	Toluene	Ethyl benzene	Xylenes	
MW17	21-May-02	Handex	7780	7500	280	<LOR	<LOR	2800	2700	200	1200	1
	21-Feb-03	IT Environmental	PSH Present					PSH Present				
	29-Jun-04	IT Environmental	41200	36000	2000	3000	200	19000	9900	1200	4700	<LOR
MW18	21-May-02	Handex	17100	16000	1100	<LOR	<LOR	8300	2400	560	2670	<LOR
	21-Feb-03	IT Environmental	11350	9800	1100	<LOR	450	6000	1600	320	1190	<LOR
	29-Jun-04	IT Environmental	43400	32000	6500	4800	100	16000	7200	1100	4700	<LOR
MW19	21-May-02	Handex	20500	19000	1500	<LOR	<LOR	9600	3000	890	4200	<LOR
	21-Feb-03	IT Environmental	33400	31000	2400	<LOR	<LOR	12000	8600	1400	7500	<LOR
	29-Jun-04	IT Environmental	35500	32000	3300	200	<LOR	14000	7900	1300	6700	<LOR
MW20	21-May-02	Handex	1370	1300	70	<LOR	<LOR	920	<LOR	47	200	<LOR
	21-Feb-03	IT Environmental	4000	2400	1600	<LOR	<LOR	160	240	180	890	<LOR
	29-Jun-04	IT Environmental	470	320	150	<LOR	<LOR	170	3	6	46	<LOR
MW21	21-May-02	Handex	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	21-Feb-03	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
MW22	21-May-02	Handex	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	21-Feb-03	IT Environmental	20	20	<LOR	<LOR	<LOR	6.3	5	2	7	<LOR
	29-Jun-04	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	2
MW23	21-May-02	Handex	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	21-Feb-03	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
MW24	21-Feb-03	IT Environmental	2510	1700	810	<LOR	<LOR	480	370	68	590	<LOR
	29-Jun-04	IT Environmental	1360	700	360	300	<LOR	700	<LOR	<LOR	<LOR	8
MW25	21-Feb-03	IT Environmental	169420	150000	17000	1700	720	31000	57000	6100	37000	23
	29-Jun-04	IT Environmental	66600	50000	15000	1400	200	11000	25000	1800	11400	142
MW26	21-Feb-03	IT Environmental	760	650	110	<LOR	<LOR	500	<LOR	26	98	<LOR
	29-Jun-04	IT Environmental	3300	1800	1300	200	<LOR	150	270	260	1130	<LOR
MW27	21-Feb-03	IT Environmental	75100	71000	4100	<LOR	<LOR	29000	28000	2100	11700	<LOR
	29-Jun-04	IT Environmental	87600	83000	4300	300	<LOR	38000	30000	2500	13400	<LOR
MW28	21-Feb-03	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	3
	29-Jun-04	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	5
MW28	21-Feb-03	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	29-Jun-04	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR

TABLE 8
HISTORICAL GROUNDWATER ANALYTICAL RESULTS
TPH, BTEX AND LEAD
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
(All concentrations in µg/L, unless otherwise specified)

Sample ID	Sample Date	Comments	Total Petroleum Hydrocarbons					BTEX Compounds				Lead
			TPH	C ₆ -C ₉	C ₁₀ -C ₁₄	C ₁₅ -C ₂₈	C ₂₉ -C ₃₆	Benzene	Toluene	Ethyl benzene	Xylenes	
MW30	21-Feb-03	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
	29-Jun-04	IT Environmental	#	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
Guidelines or Regulatory Requirements												
ANZECC 2000 (Marine water)			NE	NE				950	180	80	350	3.4
Dutch Intervention Levels (DIL)			600	NE	NE	NE	NE	30	1000	150	70	75

Notes: **Results** Shaded values exceed Adopted Guidelines

<LOR = Below Limit of Reporting
LOR = Limit of Reporting
MW = monitoring well
NA = not analysed
NE = guideline not established

TABLE 9
GROUNDWATERS ANALYTICAL RESULTS
NATURAL ATTENUATION INDICATORS
FORMER MOBIL MAROOCHYDORE SERVICE STATION (QL3815)
J208137F
(All results in mg/L, unless specified in Notes)

Laboratory ID				0408375/016	0408375/017	0408375/018	0408375/019	0408375/020	0408375/021
Sample ID				MW1	MW7	MW11	MW15	MW18	MW22
Sample Depth (m)				-	-	-	-	-	-
Sample Collection Date				29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004	29/06/2004
Sample Analysis Date				2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004	2/07/2004
Comments									
Analytes	Lab Method*	LOR	Nominated Investigation Criteria						
Natural Attenuation Indicators									
Ferrous Iron, Fe2+	221	0.5	NE	100	<LOR	28	9.5	6.9	<LOR
Ferric Iron, Fe3+	221	0.5	NE	-	-	-	-	-	-
Methane, µg/L	Amdel	0.01	NE	1300	27	1800	7600	5800	99
Nitrate	208	0.5	NE	<LOR	<LOR	<LOR	<LOR	<LOR	0.03
Sulphate	208	0.5	NE	28	30	0.9	11	4.3	33
Total Organic Carbon	242	1	NE	1300	23	59	89	100	6.6

Notes:

MW = Permanent Groundwater Monitoring Well

"*" = See Lab Methods & Description Table

"#" = All constituent analytes are below LOR.

"-" = Analysis not requested

"m" = metres

"% Passed" = Percentage of sample passing through at noted sieve size.

"%" = percent

"% w/w" = percent based on weight

LOR = Limit of Reporting (= Method Detection Limit)

NA = Not Applicable

(a) Where results are derived from the summation of selected analytes, LOR can not be determined.

All samples collected and analysed according to Mobil Specifications unless otherwise noted in Comments section.

Nominated Investigation Criteria:

1. Dutch Intervention Guidelines (2000) Guideline indicator for 'significant' level of impact impairing multifunctional land uses

2. Australia and New Zealand Environment and Conservation (2000) Australian Water Quality Guidelines for Protection of 95% of Species in Fresh and Marine Waters

Results

Values in highlighted cells exceed nominated investigation criteria

Fax



Queensland Government

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

To:	Guyton Giles Midas Car Care	Fax:	5443 2166 5443 2046
From:	Greg O'Brien, Environmental Operations		
Telephone:	(07) 32244514	Fax:	(07) 32277 677
E-mail:	Greg.O'Brien@epa.qld.gov.au		
Date:	21 June 2004	Pages:	3 (including this page)
Subject:	EXECUTION OF s392 NOTICE, MOBIL FUE SPILL		

Guy

Discussing issues with Mobil. Will need urgent resolution of matter and will contact you shortly.

Regards

Greg O'Brien

RTI DL RELEASE - EHP

Sent 8.30am 21/6

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**Queensland
Government**

Enquiries Greg O'Brien
Telephone (07) 32244514
Your reference
Our reference BNE9848

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

18 June 2004

COPY

Mr Guyton Giles
Midas Car Care Centre
120 Sugar Road
Maroochydore Qld 4558

Dear Mr Giles

**ENVIRONMENTAL PROTECTION ACT 1994 (EP Act), UNDERGROUND FUEL SPILL,
EXECUTION OF SECTION 391 REMEDIATION NOTICE**

I refer to the above and to our telephone discussion of 18 June 2004 regarding the following matters.

The Remediation Notice was issued to Mobil Australia to deal with the contamination of soil and groundwater caused by an underground fuel spill related to Mobil's occupancy of the service station adjacent to your premises. The spill has spread beyond the boundaries of the service station. As you are aware, implementation of the Notice requires that environmental consultants acting for Mobil must enter the site of which your company is the lessee and occupier and perform works relating to the Notice.

The Environmental Protection Agency (EPA) has been advised that the site owner has given written agreement to access your site and that Mobil's environmental consultant IT Environmental has provided information to your company in the past regarding the works necessary on your site to execute the above Notice. It is also noted that civil works related to installation of interception and collection equipment to deal with the contaminants have been carried out on your site in the past with your consent. As you advised, your company has an agreement with Mobil about site entry.

The EPA has been further informed on 17 June 2004 by IT Environmental that they have been denied access by you to conduct works needed to implement the Notice and that there is a matter of dispute between your company and Mobil.

s.73 irrelevant information

s.73 irrelevant information

However, the EPA is seriously concerned about the ongoing health and environmental risks posed by the fuel spill and any further delays in remediating the contamination are unacceptable.

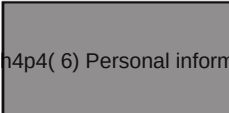
Page 1 of 1

The EPA is of the understanding that the work that is required on your site involves access to the established wells and adjustment of equipment used to extract contamination from below the surface. The EPA is further advised that this work, that would require periodic site visits would result in minimal intrusion into your business activities other than say, relocation of a vehicle to gain access to monitoring and extraction wells.

In order that your company is protected from any possible action that may occur under the EP Act, it is suggested that matters in dispute be separated from the necessity to undertake the cleanup works to address serious environmental harm from the spill and to minimise any liability that may ensue from the spread of contamination while works are delayed. The EP Act establishes provisions that identify the obligations of persons to comply with the Act and the options that are available to the EPA to ensure that compliance occurs. The EPA will be obliged to take action under the EP Act in the event that the problem of access to deal with the contamination is not speedily resolved.

The EPA seeks your early advice on this matter by close of business on 23 June 2003. Please contact the undersigned (ph 32244514) for any further information or assistance that may aid in resolution of this matter.

Yours sincerely


sch4p4(6) Personal information

Greg O'Brien
Chief Scientific Advisor Project Support

Fax



Queensland Government

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

To: Sean Mulcair, Mobil Oil Australia **Fax:** 03 92865233

From: Greg O'Brien, Environmental Operations

Telephone: (07) 32244514 **Fax:** (07) 32277 677

E-mail: Greg.O'Brien@epa.qld.gov.au

Date: 21 June 2004 **Pages:** 3 (including this page)

Subject: SUGAR RD MAROOCHDORE, EXECUTION OF REMEDIATION NOTICE

Sean

We need urgent resolution of this matter. There have been too many delays.

Greg O'Brien

RTI DL RELEASE - EHP

Sent 5.30 PM 21/6

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Release



**Queensland
Government**

Enquiries Greg O'Brien
Telephone (07) 32244514
Your reference
Our reference BNE9848

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

18 June 2004

The Chief Executive Officer
Attention Sean Mulcair
Mobil Oil Australia
Pegasus Centre
PO Box 484
Altona Vic 3018

COPY

Dear Mr Mulcair

REMEDIATION NOTICE, 120 SUGAR ROAD MAROOCHODARE

I refer to the above site and to the recent denial of access (17 June) to your consultants IT Environmental to the adjacent site by the lessees Midas Car Care in the course of implementing the requirements of the Notice.

In the circumstances the EPA continues to have concerns regarding the serial delays that have occurred in the implementation of the above Notice since it was served and to the health and environmental risks posed by the underground fuel spill and its spread onto nearby properties.

In the current circumstances the EPA is aware that there is an agreement between yourselves and Midas regarding entry of their site and that there is a matter of dispute between the parties regarding a fence on the Midas site s.73 irrelevant information

The EPA accepts that Mobil is obliged to act lawfully in implementation of the Notice including access to any property onto which the contamination has spread. However, the EPA is unable to accept any further delays in dealing with the contamination due to the risks involved including the potential spread of contamination. The EPA is dissatisfied at the delays that have occurred since the date of the Notice and with the limited advice that has been provided to the EPA, particularly in the past six months regarding these ongoing delays, their cause and means of resolution.

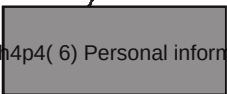
It is considered that matters which have given rise to the current delay are able to be resolved between Midas and yourselves without any further delay occurring. The EPA requests that action be taken with Midas to resolve this matter expeditiously and that the EPA be advised of the outcome of such actions no later than close of business on 23 June 2004.

The EPA also notes that the time has expired for the implementation of the above Notice. Under the terms of the Notice the EPA will consider extensions of time and a number of extension have been agreed since the Notice was issued. It is required that an immediate request for extension of the remediation period be made to the EPA by the Notice recipient that will cover the projected period of remediation.

Failure to address these matters will result in the EPA taking actions under the Environmental Protection Act 1994 to ensure that the health and environmental risks posed by the contamination are addressed.

Please contact the undersigned (07 32244514) should you require any additional information.

Yours sincerely


sch4p4(6) Personal information

Greg O'Brien

Chief Scientific Advisor Project Support

RTI DL RELEASE - EHP

Enquiries to: Greg O'Brien
Telephone: (07) 3224 4514/Fax (07) 3247 3278
Your reference:
Our reference: BNE9848



Queensland
Government

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

sch4p4(6) Personal information

Permit to Remove and Dispose of Contaminated Soil

Pursuant to Section 424 of the *Environment Protection Act* 1994 (EP Act) permission is given to the applicant

Ms Julie McDowell

IT Environmental (Australia) Pty Ltd

Unit 7, 20 Smallwood Place MURARRIE QLD 4172

Telephone: (07) 3899 8359

Fax: (07) 3899 9692

to remove and dispose of soil contaminated with
petroleum hydrocarbons

from 116 - 118 Sugar Road, ALEXANDRA HEADLANDS QLD 4572

on Lot 1 on RP176929 and described in the following correspondence:

Application for Disposal Permit dated 6 April 2005 and TPR approval dated 7 April 2005.

The permit holder is responsible for ensuring that the specific and standard conditions in Schedules 1 and 2 of this permit are complied with by all personnel involved in the excavation, removal and disposal.

Signed

sch4p4(6) Personal information

Elissaveth Black

Principal Environmental Officer (Contaminated Land Unit)

2/4/05

CC: Southern Region (EPA), attn. Hugh Wright, Fax 3225 8723

Cc: Collex Pty Ltd, attn. David Solomon, Fax 3275 0101

Notice to Applicant

The conditions on this permit have been decided after consideration of the standard criteria (EP Act) and for the purpose of preventing environmental harm. The applicant may apply for a review or appeal against the decision within 10 business days of receipt of this notice (s521 and s531).

288 Edward Street Brisbane
Queensland 4000 Australia
GPO Box 2771, Brisbane Qld 4001
Telephone (07) 3225 1827
Facsimile (07) 3247 3278
Website www.env.qld.gov.au
ABN 87 221 158 786

Schedule 1 of 2 – Specific Conditions

The volume or mass of the contaminated soil shall not exceed 200 cubic metres.

The soil is to be disposed in accordance with the disposal facility approval letter dated 5/04/2005 at Collex Pty Ltd TiTree Bioenergy Facility.

The soil must be disposed between 7/04/2005 and 7/07/2005.

Other Conditions:

(a) The contaminated soil to be removed from the subject site must be stockpiled at the nominated landfill facility for a period of no longer than 15 business days. Within this timeframe, the contaminated soil stockpile(s) must be sampled and analysed.

(b) The soil stockpiled at the TiTree facility must be sampled at a rate of at least 1 sample per 50 cubic metres and analysed for TPH and BTEX compounds. The results of the analyses must be forwarded to the EPA-approved TPR for the site for review prior to the soil being disposed of into the nominated landfill. The impacted soil is only to be disposed of into the landfill once the TPR has authorised this disposal operation in writing after reviewing the soil analyses results.

(c) In the case where the chosen disposal option requires the stockpiled contaminated soil to be removed from the nominated landfill facility to another treatment/disposal facility, the applicant must apply for new Disposal Permit prior to removal of the contaminated soil from the nominated landfill facility.

RTI DL RELEASED

6. Interim storage

Contaminated soil which is temporarily stored at the site of origin or approved for storage at a separate property must be stockpiled and securely covered and/or managed to ensure that:

- (a) rainwater is drained away from the stockpiles;
- (b) contaminated soil is not transported from the stockpile by wind or rainwater;
- (c) offensive odours or noxious gases are not released; and
- (d) soil underlying the stockpiles is not affected by contamination.

A report is to be provided to the Administering Authority within 28 days of final disposal that verifies that the storage area is fully cleared of contamination.

7. Treatment of soil

(a) Licensed facility

When treatment is to be undertaken at a licensed general waste disposal facility or regulated waste treatment and disposal facility, acceptance receipts must be provided to the Administering Authority within 10 days of contaminated soil delivery. The contamination level in the soil must be reduced to a level agreed by the Administering Authority. When contaminated soil is stored at such facility pending treatment, storage is to be undertaken according to condition 6.

(b) Other treatment sites

(i) Soil remediation and validation report.

The permit holder must provide a report of the soil remediation including chemical test results that validate that the contamination has been lowered to levels agreed with the Administering Authority. The report must provide evidence that the land underlying the treatment activity is not affected by contamination.

(ii) Environmental harm.

Treatment activities must be carried out to ensure that environmental harm is not caused and that contaminants including treatment agents are not released from the site by wind, stormwater or as offensive or noxious gases. The requirements of condition 6 also apply.

(c) Final disposal

When soil contamination has been reduced to levels acceptable to the Administering Authority, the soil may be disposed of as general fill unless otherwise specified in Schedule 1. The location of the final disposal site of the soil is to be identified after treatment by written advice to the Administering Authority.

****End of Document****

TRANSACTION REPORT

07-APR-2005 THU 12:50

FOR: CONTAM LAND UNIT - EPA 07 32473278

BROADCAST

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	MNO.	DP
07-APR	12:44	038999692	1' 38"	4	SEND	OK	137	
	12:46	032750101	1' 20"	4	SEND	OK	137	
	12:48	032432199	1' 17"	4	SEND	OK	137	

TOTAL : 4M 15S PAGES: 12

Enquiries to: Greg O'Brien
Telephone: (07) 3224 4514/Fax (07) 3247 3278
Your reference:
Our reference: BNE9848



**Queensland
Government**

Environmental Protection Agency

**Incorporating the
Queensland Parks and Wildlife Service**

Permit to Remove and Dispose of Contaminated Soil

Pursuant to Section 424 of the *Environment Protection Act* 1994 (EP Act) permission is given to the applicant

Ms Julie McDowell

IT Environmental (Australia) Pty Ltd

Unit 7, 20 Smallwood Place MURARRIE QLD 4172

Telephone: (07) 3899 8359

Fax: (07) 3899 9692

to remove and dispose of soil contaminated with

petroleum hydrocarbons

from 116 - 118 Sugar Road, ALEXANDRA HEADLANDS QLD 4572

on Lot 1 on RP176929 and described in the following correspondence:

Disposal Permit - Application Review 7/14/2005	
Source Site <div>Address</div> <div>120 Sugar Rd MAROCHYTURE (Alexandra Headlands) 41572</div> <div>TPR ✓ approval</div> <div>File No.</div> <div>BNE 9548</div> <div>Lot + Plan No</div> <div>Lot 1 on RP176 929</div> <div>EMR ID</div> <div>5399</div> <div>Notifiable Activity</div> <div>34 - 5/3m</div> <div>CoT</div> <div>previously provided</div> <div>Plan/Figure</div> <div>✓</div>	
Contamination <div>Contaminant</div> <div>petroleum hydrocarbons</div> <div>No. Samples</div> <div>to be characterized at landfill</div> <div>Contaminant Concentration</div> <div></div> <div>Disposal Volume: 200m³</div> <div>QA/QC - OK: N/A</div> <div>CoC, Labs - OK: N/A</div>	
Treatment/Disposal Site <div>Address</div> <div>COLLEX P/L 9, Tree biomass facility</div> <div>Acceptance Letter</div> <div>5/14/2005</div> <div>Proposed Action (Treatment/ Disposal)</div> <div>temporary storage and characterization</div> <div>Acceptance Criteria</div> <div>✓</div>	

Elissaveth Black

From: Mack_Dreyer@URSCorp.com
Sent: Wednesday, 6 April 2005 6:42 PM
To: Elissaveth Black
Subject: Disposal Permit - 120 Sugar Road Maroochydore

Elissaveth

As you are aware I have received a Disposal Permit application for the Sugar Road site. This is a site that is listed on the CLR, a remediation notice has been issued and I am the TPR. I have reviewed the Disposal Permit application and my main issue is with the disposal of the material to the Collex Ti-tree landfill. We do not have any actual sample results for the area to be excavated, but I am happy with this as the purpose of the excavation is to install an interception trench and recovery system (this is a narrow system and no actual soil bores have been placed where the trench is to be located).

What is currently proposed is that soil is to be transported to the Collex Ti-tree facility where it will be stockpiled and sampled. If the results demonstrate that it can be disposed into the landfill it will be, otherwise will be landfarmed until it meets Ti-Tree's acceptance criteria.

As a TPR I have no problems with this approach providing Collex are licensed to do this and to be perfectly honest it has taken some time to get to this far and I don't want to give anyone any excuses for not continuing with the trench installation. However, I am aware of the policy of non disposal of hydrocarbon impacted material, (that can be bioremediated) directly into landfills. It should be noted that the site at 120 Sugar Road is too small and busy to conduct any landfarming on-site.

Before I give my approval to this disposal permit could you please give me a call on 32432129 to discuss the proposed treatment/disposal methodology and how it sits with EPA policy on this matter.

Regards

Mack Dreyer
Principal Environmental Chemist
URS Australia Pty. Ltd.
Level 14, 240 Queen Street, Brisbane
Queensland 4000 Australia
Mack_Dreyer@urscorp.com
ne: (07) 3243 2111 Fax: (07) 3243 2199

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Elissaveth Black

From: Mack_Dreyer@URSCorp.com
Sent: Thursday, 7 April 2005 10:13 AM
To: Elissaveth Black
Subject: Disposal Permit - Lot 1 RP176929

Elissaveth

As discussed I have received a Disposal Permit Application for review for the former Mobil Service Station site (now a Newmans service station) located at 120 Sugar Road Maroochydore (Lot 1 on RP176929). The disposal permit is for 200 m3 of hydrocarbon impacted soil to be disposed at the Collex Ti-Tree Landfill. As there is no chemical analysis for the soil that is to be removed off-site, Collex have agreed to stockpile the impacted soil at their Ti-Tree facility and analyse the soil. Once the TPH/BTEX concentration of the soil is known, Collex will dispose the impacted soil to the Ti Tree facility, or, if the soil does not meet the landfill acceptance criteria, landfarm the soil until it does and then dispose the soil to the landfill. As the EPA approved Third Party Reviewer for the site I am satisfied that the Disposal Permit should be issued providing the following conditions are included:

- The disposal must be in accordance with landfill acceptance letter dated 5 April 2005
- The soil stockpiled at the Ti-Tree facility must be analysed at a rate of at least 1 sample per 50 m3 for TPH and BTEX compounds. The results of the analysis must be forwarded to the EPA approved TPR for the site for review prior to the soil being disposed into the landfill. The impacted soil is only to be disposed into the landfill once the TPR has authorised this disposal operation in writing after reviewing the soil analytical results.
- Standard EPA disposal permit conditions.

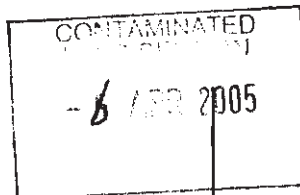
I have not been able to get a hold of Greg (his line has been engaged) but I do not want to hold this Disposal Permit application anymore than I have to.

If you have any questions on this matter please contact me on 32432129.

Regards

Mack Dreyer
Principal Environmental Chemist
URS Australia Pty. Ltd.
Level 14, 240 Queen Street, Brisbane
Queensland 4000 Australia
Mack_Dreyer@urscorp.com
Phone: (07) 3243 2111 Fax: (07) 3243 2199

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IT Environmental (Australia) Pty Ltd
ABN: 89 003 931 057

Metroplex on Gateway
Unit 7, 20 Smallwood Place
Murarrie Qld 4127
Tel: (07) 3899 8359
Fax: (07) 3899 9692
Email: tberger@itenviro.com.au

www.itenviro.com.au



FACSIMILE

To:	Ms. Elizabeth Black	Fax No.:	07 (07) 3247 3278
cc:		Fax No.:	
From:	Julie McDowell		
Date:	29 March 2005	Page 1 of:	8

Re: Application for Soil Disposal Permit - Former Mobil Service Station, Sugar Road, Maroochydore

Dear Elizabeth

As discussed yesterday, please find attached an application to remove soil from the former Mobil Service Station (now a Neumann's Petroleum Service Station) located at 120 Sugar Road, Maroochydore.

We are scheduling to remove soil from the site Thursday afternoon (7 April 2005 - tomorrow) and therefore anything you could do to process this application by tomorrow morning would be greatly appreciated.

If you have any questions in relation to this request or if it appears that this application will not be able to be processed by tomorrow, please do not hesitate to contact me on (07) 3899 8359.

Yours sincerely
IT Environmental (Australia) Pty Ltd

sch4p4(6) Personal information

Julie McDowell
Environmental Engineer
Project Manager

6/4/05 spoke to Julie and advised
that as the remediation/site is
subject to RPR, DP would have
to go through him (Mark
Dwyer).

sch4p4(6) Personal information



Application for Disposal Permit

Section 424 Environmental Protection Act (1994)

Please note: Failure to lodge all required information will result in your application being rejected and returned to you for completion and re-submission.

Important information (please read before completing this form)

A decision on an application will be made within 14 days of receipt, with a further 10 days allowed for preparation of the permit.

Complete the following: (Attach a separate sheet if more space required)

1. Applicant details

(This is the contact person to whom the Disposal Permit will be sent and to whom all enquires will be directed)

Contact name Julie McDowell Telephone (07) 3899 3359 Fax (07) 3899 9692
Company Name (if applicable) IT Environmental (Ans) p/l
Postal Address Unit 7, 20 Smallwood Place
Muramba Qld Postcode 4127

2. Details of site(s) from which soil is to be removed

Has a Site Investigation Report been submitted to EPA?

☒ Yes EPA file number BNE 9848
☐ No

Real Property Description (Lot on Registered Plan) Lot 1 on Plan RP176929

Street Address of site (s) 120 Sugar Road, Maroochydore

Copy of current Certificate of Title

☐ Enclosed with this application
☒ Submitted previously to the EPA within a site investigation report

Has the site been used for a Notifiable Activity as per Schedule 2 of the Environmental Protection Act 1994?

☒ Yes (please specify) Service Station
☐ No

Is the site presently being used for a Notifiable Activity?

☒ Yes (please specify) Service Station
☐ No

Is the site currently on the Environmental Management Register or Contaminated Land Register?

☒ Yes
☐ No (if no, a notification form must be submitted to EPA)

Has contaminated soil been removed from this site in the past?

☒ Yes (if yes, was an application for off-site disposal sought? ☒ Yes ☐ No)
☐ No

3. Approximate volume (in m³) of soil to be removed (allowing for excavation bulking)

200m³

Describe how the volume of soil to be removed was calculated Tested with a bulking factor applied

4. Dates between which soil will be moved to the disposal location (As per Section 424(7), permits will only be valid between dates stipulated in the disposal permit)

4 April 05 to 30 April 05

5. Justification of request

Reason(s) why on-site treatment or management not proposed Operating service station not enough room on-site to treat soil, public access issues

Will validation sampling be undertaken to ensure that contaminated soil is removed? No. Removal due to installation of a soil/groundwater remediation system.

6. Description of contamination present in soil to be removed

Contaminants present PoH, TPH, BTEX compounds

Please enclose with your application: Samples of soil removed will be collected @ soil disposal premises. Results forwarded to EPA ASAP.

- TBP ☒ Figure showing the location of soil sampling locations and contamination source(s)
- TBP ☐ Tabulation of soil analysis results
- TBP ☐ TCLP results from relevant soil samples
- TBP ☐ Laboratory reports from relevant soil samples
- TBP ☐ Explanation of location and depths of samples, how samples were collected, and how sample integrity was maintained.

7. Written acceptance from owner of site receiving soil

Is the soil being removed to a local government-administered landfill?

- ☐ Yes ☐ Written acceptance from Council is enclosed
- ☒ No (Please complete Section 8 of this application form).

Name and Address of Local Government administered landfill _____

8. Description of site receiving soil (complete this section only if soil not going to local government-administered landfill)

Real Property Description (Lot on Registered Plan) Lot 4 on Plan RP24574

Street Address of site Colley P/L TiTree bioEnergy Facility, Champions Way,

Local government authority Ipswich City Council Willow Bank

- ☒ Copy of Certificate of Title (CT) provided
- ☒ Written acceptance from registered owner is enclosed with this application

converting waste into clean energy



A.B.N. 67 450 387 919
166 Boundary Road
Rocklea, Q. 4106
PO Box 933
Archerfield Q. 4108
T: 07 3275 0111
F: 07 3275 0142

April 05, 2005

Ref: 0045 STD

IT Environmental (Australia) Pty Ltd
7/20 Smallwood Place
MURARRIE QLD 4172

Soil Treatment & Disposal

Attention: Julie McDowell

Reference: Acceptance of Contaminated Soils from the Neumann Service Station Maroochydore Remediation at 120 Sugar Road, Maroochydore, Qld for Soil Treatment & Disposal at Ti Tree bioENERGY Facility.

Dear Julie,

We refer to our recent conversations, relating to a approximately 230m³ of contaminated material arising from the above site. Collex understands that the data relating to the site is currently unavailable and thus the soil cannot be characterised, is expected to have a high Benzene concentration. As a result we cannot accept this material for disposal, however we will be able to receive the material, stockpile it on site, characterise it and then either dispose of the material to Lined Landfill or Bioremediate it to Lined Landfill criteria and dispose of it at our Ti Tree bioENERGY Facility. We have proposed the Ti Tree bioENERGY Facility due to the presence of the BETX contamination and the lack of close proximity residence at this site.

The nominated site for soil treatment & lined landfill disposal of the approved material is Stage 1 of the Collex Pty Ltd landfill at Ti Tree bioENERGY, Champions Way, Willowbank, Qld 4306. The real property description of stage 1 of this site for EPA verification is Lot 4 on RP24574, County of Churchill, Parish of Jeebropilly. Access to the site is via Champions Way at Willowbank.

Acceptance is subject to the following conditions:

1. Each load of material must be wetted with water (if necessary) and covered prior to transportation for suppression of dusts.
2. EPA must approve the disposal of the material at Ti Tree bioENERGY Facility and confirm this by issuing a section 424 permit.
3. The soil must not contain any other contaminants in exceedance of the limits given in schedule G of the concurrence agency response to our Development Approval, which has been sent to you previously.

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TI TREE
bioENERGY

A.B.N. 67 450 387 919
166 Boundary Road
Rocklea, Q 4106
PO Box 933
Archerfield Q 4108
T: 07 3275 0111
F: 07 3275 0142

4. The haulage contractor and relevant truck registration numbers (if not supplied by Collex) must be notified to us in advance of waste delivery to allow pre-registration on the site's weighbridge system. A confidential job specific authorisation code (waste code) will be issued on your confirmation of EPA approval, for use in conjunction with the attached procedure.

If there is any additional information you require please do not hesitate to contact myself on the numbers listed below.

Yours Sincerely, , 11

sch4-Signature

David Solomon
Environmental Services & Remediation Manager

Tel: 07 3275 0164

Mob: 07 3275 0164 (6) Personal information

Fax: 07 3275 0101

email: dsolomon@collex.com.au

RTI DL RELEASE - EHP

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TI TREE
bioENERGY

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Rocklea, Q 4106
PO Box 933
Archerfield Q 4108
T: 07 3275 0111
F: 07 3275 0142

PROCEDURE FOR USING TI TREE UNMANNED WEIGHBRIDGE

Manual Operation - Keying in Information

1.	Drive onto Weighbridge	When weighbridge is unoccupied and the green light is lit, drive slowly onto the weighbridge, and align your cab with the inbound Driver Control Station (DCS).
2.	Weighing In	When the DCS Screen prompts you, use the keypad to type in your vehicle rego Beware of the difference between 0 (number zero) and O (letter)
3.	Accept	Push the accept Button
4.	Waste Type	This screen will prompt to type in the waste code. IT Environmental - Neumann Service Station Maroochydore Remed (J.R. Stephens Pty Ltd) SOIL TREATMENT DISPOSAL * * *
5.	Accept	Push the accept Button
6.	Remove Docket	Wait for docket to print. Remove Docket and proceed to the landfill.
7.	Prior to Tipping	The printed docket must be signed, taken and presented to the operator at the working face.
8.	After tipping	Return to the weighbridge.
9.	Drive onto Weighbridge	When it is unoccupied and the green light is lit. Align your cab with the outbound Driver Control Station.
10.	Weighing Out	Enter Vehicle Rego
11.	Accept	Push the accept Button
12.	Remove Docket	Remove Docket and Drive on. Transaction Completed

CAUTION:

Please give way to outbound traffic.

- The Traffic lights are not to control inbound & outbound traffic. A green light means that the bridge is zeroed and can be driven onto. Consequently it shows green at both ends at the same time.
- If the screen at the driver Control Station does not prompt you with instructions, or respond to your entry, you should reverse off the bridge, wait for a green light and try again.
- A transaction can only be finalised IF your vehicle is fully on the weighbridge. If you put front or rear wheels on the ramps no docket can be printed.
- No inbound docket, or incorrect inbound docket means no tip.

Date	6/04/2005	Call Group		Action	
Name	mack dreyer				
Company		Call Type			
Phone		Time	0	Action By	

Call Log Comments	EPA Comments
main body of site, interception trench is being put in today and the shoring up will be done today and tomorrow	will let greg know







Porter Davies LAWYERS

Ref ref:

Our ref:

JBP 0000415

24 February 2005

Mr Guyton Giles
Operations Manager
Giles & Pitts Pty Ltd
120 Sugar Road
MAROOCHYDORE QLD 4558

BY FACSIMILE: 5443 2046

Dear Sir

SITE ACCESS - 120 SUGAR ROAD, MAROOCHYDORE

We refer to your letter dated 24 February 2005.

In it, you refer to a letter from IT Environmental (Australia) Pty Ltd to Giles & Pitts Pty Ltd dated 9 December 2004, which letter requested access to the site which your company occupies as lessee for the purposes set out in the letter.

You responded to that letter by a letter dated 10 December 2004.

In your letter under reply, you refer to the "requested concessions" sought in your letter dated 10 December 2004 to Ms Tracy Berger of IT Environmental (Australia) Pty Ltd.

~~In that letter, you made no mention of site access. Instead, you made a litany of demands, most of which had nothing at all to do with the relatively straightforward issue of site access. It is disingenuous and misleading to describe those completely unreasonable demands as "concessions".~~

Amongst other things, you demanded written statements from IT Environmental (Australia) Pty Ltd accepting responsibility in respect of issues unrelated to site access and remediation.

It is clearly the case that IT Environmental (Australia) Pty Ltd, on proper advice, would never give you the statements which you demanded, nor should they have been requested to do so.

~~The issues raised are completely irrelevant to the issue of site access.~~

Amongst other things, you demanded a bond "for the amount of \$50,000 (AUS) to be lodged with the solicitors Watson & Quinn for Giles & Pitts Pty Ltd".

This demand, simply put, was outrageous and nonsensical and completely unjustified by reference to any events past and bearing no reference to any conceivable damage you might suffer (if that indeed be the reason for the demand) as a result of entry to the site for the purposes that entry had been sought.

Please note: As from 31 January 2005 we have moved premises. Please update your records with our new contact details

Email: enquiries@porterdavies.com
Web: www.porterdavies.com

Level 5, 46 Edward Street, Brisbane 4000
Postal GPO Box 2042, Brisbane 4001
Tel 07 3001 2100 - Fax 07 3319 6770

838 Moggill Road Chapel Hill Qld 4068
Tel 07 3678 8800 - Fax 07 3678 3633

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24 FEB 05 THU 16:37

0754432046

- 2 -

Even if you were entitled to demand the payment of a bond (which you are not), the amount sought is simply ridiculous.

We do not propose to respond to any of the other matters raised in your letter. We have responded to correspondence from you in relation to all those issues on previous occasions and to further respond would be repetitive and tedious.

You have been given a formal notice under section 394(2) of the Environmental Protection Act 1994 informing you of our client's intention (by its contractor, IT Environmental (Australia) Pty Ltd) to enter the site for the purpose of inspecting and, if necessary, conducting maintenance to the monitoring wells located on the site at 9:00am on Sunday, 27 February 2005 for the above purposes.

Because of our inability to successfully transmit that notice to you last Friday and Saturday, we sent you a further letter yesterday in which the date of entry was deferred until 6 March 2005 at 9:00am. This deferral was necessary to ensure that you received the seven days' notice required under the Environmental Protection Act.

Do you or do you not agree to grant access to the site in terms of that notice?

It is the preferred option of IT Environmental (Australia) Pty Ltd to enter the site on Sunday, 27 February 2005 at 9:00am.

Do you or do you not agree to grant access to the site on that day at that time? If so, what arrangements are proposed for access as we understand that access to the rear part of the site may be prevented by a locked gate.

If you do not respond to this letter, we will make an assumption that you have not agreed to grant access in terms of that notice.

Failing agreement on your part, we will rely on the subsequent letter sent to you yesterday, the operative date for access under that letter being 6 March 2005 (at 9:00am).

If you do not agree in writing to access in terms of that notice, the necessary court application will be made without any further reference to you.

In a telephone discussion with you, you indicated that he had discussed the issue with you and you had agreed to grant access.

In any court proceedings that we are forced to bring in the absence of specific agreement from you, we will be relying on evidence to this effect. Our client will also be asking for a costs order against you in respect of the proceedings which our client has been forced to bring as a result of your intransigence and entirely unreasonable behaviour.

Your early response would be appreciated.

Yours faithfully,

[Redacted Signature] sch4p4 (6) Personal information

Encl

PORTER DAVIES

Contact person: Jean Porter
Direct line: 07 30012101
Direct fax: 07 31057361
Email: jpu@porterdavies.com

W:\practise\ref\ref.doc

0754432046

24th February, 2005

Mobil Australia Pty Ltd
CC- Porter Davies Lawyers
Level 5, 46 Edward Street
Brisbane, Queensland 4001

Dear Sir

In reference to your letters dated 18th February 2005 and 23rd February 2005. Giles and Pitts Pty Ltd had in fact received the facsimile transmission dated 18th February, 2005. Giles and Pitts Pty Ltd do surmise that as per previous correspondence Mobil Australia Pty Ltd again failed to meet with dedicated time lines prescribed to help facilitate the remediation of site 120 Sugar Road, Maroochydore. Giles and Pitts Pty Ltd note that you refer to the section 394 of the Environmental Protection Act 1994. Giles and Pitts Pty Ltd also note for the record that Mobil Australia Pty Ltd reformulated the letter dated 17th February, 2005 to comply with stated statutory obligations outlined in section 394 #2 The Environmental Protection Act 1994. Giles and Pitts Pty Ltd again refer you to several documents dated 23rd January 2001, 23rd April 2004 and 25th June, 2004. Giles and Pitts Pty Ltd commitment to environmental concerns has never deviated from these agreements prescribed in previous documents. These documents can be obtained for Mobil Australia Pty Ltd from Giles and Pitts Pty Ltd at written request.

In reference to the letter dated 9th December, 2004. Giles and Pitts Pty Ltd formulated a letter of response within twenty four (24) hours of document. Giles and Pitts Pty Ltd requested several concessions from Mobil Australia Pty Ltd contractor IT Environment (Australia) Pty Ltd. Giles and Pitts Pty Ltd do note for the record that IT Environment (Australia) Pty Ltd failed to respond to the requested concessions until seventy two (72) days later, 17th February, 2005. Giles and Pitts Pty Ltd do note for the record that IT Environment (Australia) Pty Ltd can respond to any request from Giles and Pitts Pty Ltd in any manner that it deems suitable. Giles and Pitts Pty Ltd do note for the record that requests can be formulated by courts with correct jurisdiction. Giles and Pitts Pty Ltd also note for the record that letters dated 23rd January 2001, 23rd April 2004 and 25th June 2004 clearly stipulate Giles and Pitts Pty Ltd commitment to the remediation notice and these stated letters formally gave consent, within the constraints agreed to in, The Access Agreement and The Environmental Protection Act 1994. IT Environments (Australia) Pty Ltd failure to enter site 120 Sugar Road, Maroochydore on the stated date 13th December, 2004 can not be held against Giles and Pitts Pty Ltd. Giles and Pitts Pty Ltd again refer Mobil Australia Pty Ltd to several documents pertaining to consent to site access.

In relation to the meeting between agents for Giles and Pitts Pty Ltd, Mobil Australia Pty Ltd, IT Environment (Australia) Pty Ltd and Porter Davies Lawyers, no written notice of intent to enter land was submitted at that meeting. Giles and Pitts Pty Ltd again refer Mobil Australia Pty Ltd to previous documents and The Environment Protection Act 1994.

0754432046

Giles and Pitts Pty Ltd do formally note for the record that Mobil Australia Pty Ltd has again used stand over tactics and intimidation to force Giles and Pitts Pty Ltd to comply with requests that were formally agreed to in previous correspondence. Giles and Pitts Pty Ltd do note for the record that this is considered by Giles and Pitts Pty Ltd as an attitude of aggression. Giles and Pitts Pty Ltd also note for the record that Mobil Australia Pty Ltd intend to "trade off" denial of stated contractual agreements for obligations that Giles and Pitts Pty Ltd has committed to in previous correspondence. The use of the landlord [sch4p4(6) Personal information] and the threat of court action against Giles and Pitts Pty Ltd is not related to the issue of denial of stated contractual agreements by Mobil Australia Pty Ltd and its' contractors stated statutory obligations under The Environmental Protection Act 1994.

Giles and Pitts Pty Ltd also note for the record that that Mobil Australia Pty Ltd had stalled sufficient remediation policies for a total of six hundred and seven (607) days after the issue of the Access Agreement signed 23rd January, 2001 to Giles and Pitts Pty Ltd and between the issue of the Remediation Notice Environmental Protection Act 1994 (EP Act) Section 391 on 24th October, 2002. Clearly Mobil Australia Pty Ltd was aware of extensive contamination. The issue of the Remediation Notice served by The Environmental Protection Agency compelled Mobil Australia Pty Ltd to comply with statutory obligations outlined in The Environmental Protection Act 1994. Again Giles and Pitts Pty Ltd point out that Mobil Australia Pty Ltd stall all action necessary to comply with its' stated contractual agreements in the successful care of land managed under agreements between Mobil Australia Pty Ltd and the land owners or tenants.

Giles and Pitts Pty Ltd refer Mobil Australia Pty Ltd to the document dated 25th June, 2004, from Porter Davies Lawyers acting for Mobil Australia Pty Ltd to Giles and Pitts Pty Ltd, were Mobil Australia Pty Ltd committed to a written agreement. Giles and Pitts Pty Ltd quote "We have already agreed to expedite consideration of your claim. The writer will fully comply with that commitment and hopefully the matter can then be resolved to your satisfaction". Mobil Australia Pty Ltd has not directed a financial proposal to facilitate an agreement between Giles and Pitts Pty Ltd and Mobil Australia Pty Ltd as of this date 24th February, 2005. Giles and Pitts Pty Ltd refer Mobil Australia Pty Ltd to The Environment Protection Act Section 394 #6. No offer implied or written has been offered by Mobil Australia Pty Ltd. Mr. John Porter from Porter Davies Lawyers implied in the recent meeting between parties Giles and Pitts Pty Ltd, Mobil Australia Pty Ltd and IT Environment (Australia) Pty Ltd that a insignificant raise in an offer by IT Environment (Australia) Pty Ltd might be contemplated. This is clearly a conflict of interests on Porter Davies Lawyers behalf, in acting for Mobil Australia Pty Ltd in relation to the issue of indemnity for Giles and Pitts Pty Ltd.

0754432046

Mobil Australia Pty Ltd committed to an agreement on the 23rd January, 2001. Giles and Pitts Pty Ltd quote The Access Agreement Section 3b "To indemnify, hold harmless and defend you from or against property damage or personal injury arising out of the work performed under this agreement". In the meeting between previously mentioned parties Mr. John Porter indicated to both Mobil Australia Pty Ltd, [REDACTED]

s.73 irrelevant information

[REDACTED]
s.73 irrelevant information[REDACTED]
s.73 irrelevant information

Again Giles and Pitts Pty Ltd urge Mobil Australia Pty Ltd to respond to requests made by Giles and Pitts Pty Ltd in a manner that complies with both stated contractual and statutory obligations. Giles and Pitts Pty Ltd again demand that Mobil Australia Pty Ltd provide for litigation costs in relation to action against IT Environment (Australia) Pty Ltd for damage sustained to property in direct relation to civil works carried out on site 120 Sugar Road, Maroochydore under the Access Agreement and The Environmental Protection Act 1994 Section 394.

Giles and Pitts Pty Ltd formally and again grant access to site 120 Sugar Road Maroochydore on the dates mentioned in the letter of intent to enter land. The consent to enter the site 120 Sugar Road, Maroochydore was given in writing on several occasions previously. Giles and Pitts Pty Ltd entered the Access Agreement in good faith and will use all relevant remedies available to the company to uphold the Access Agreement Contracts dated 23rd January, 2001 and 23rd April, 2004

Yours Sincerely

[REDACTED]
sch4p4(6) Personal information

Guyton L. Giles

Operations Manager Giles and Pitts Pty Ltd

0754432046

February 7, 2005

To: Mobil Australia Pty Ltd
C/- Porter Davies Lawyers
Level 5, 46 Edward Street
Brisbane, Queensland 4001

Att. John Porter

Dear Sir,

Giles and Pitts direct you to your letter dated 17th February, 2005. You have headed your letter SITE ACCESS, the previous correspondence from Giles and Pitts Pty Ltd has not in any way regarded SITE ACCESS. The issue at hand is for Mobil Australia Pty Ltd to comply with its stated contractual agreements. The letters dated 6th January 2005, 31st January 2005 and 11th February 2005 directly relate to the agreement signed by Mobil Australia Pty Ltd on the 23rd January, 2001. Any correspondence to the contrary is a fabrication of the truth. I refer you to the letter dated 25th June, 2004.

In a meeting with agents for Mobil Australia Pty Ltd and IT Environment (Australia) Pty Ltd a number of issues were discussed. These issues directly related to the claim against Mobil Australia Pty Ltd. The conversation did discuss SITE ACCESS and agents for Giles and Pitts Pty Ltd did state that all requests for SITE ACCESS would be handled in a business manner and resolved with minimum disruption to the remediation process prescribed by The Environmental Protection Agency Section 391 Remediation Notice. Any correspondence to the contrary is a fabrication of the truth. Giles and Pitts Pty Ltd maintain a commitment to the environment and Giles and Pitts Pty Ltd has shown this in its actions to this date. Giles and Pitts Pty Ltd has responded promptly to all requests from Mobil Australia Pty Ltd and it is unfortunate that Mobil Australia Pty Ltd and IT Environment (Australia) Pty Ltd has had extremely poor time management skills in relation to dedicated correspondence to Giles and Pitts Pty Ltd.

In relations to demands from Giles and Pitts Pty Ltd, Giles and Pitts Pty Ltd have never demanded the amount of \$500,000 from Mobil Australia Pty Ltd. Giles and Pitts Pty Ltd has requested and asked to be indemnified as per the access agreement dated 23rd January, 2001. This can be confirmed as per letters dated 31st January 2005, 6th January 2005, 13th December 2004, 23rd November 2004 and 7th September 2004. In the letter dated 17th February, 2005, Mobil Australia Pty Ltd clearly asks for evidence supporting the claim that Giles and Pitts Pty Ltd has in fact indemnified the complainant in total, this will be forthcoming in a timely manner. As per previous request, Giles and Pitts Pty Ltd will maintain a commitment to professionalism.

0754432046

The claim against Mobil Australia Pty Ltd is for the contractual stated agreement to be honored. Giles and Pitts Pty Ltd can comprehend the amount of loss/commercial transaction/financial affairs for the amount that Giles and Pitts Pty Ltd indemnified the complainant for the financial loss that was suffered as a direct result of the work performed on the site 120 Sugar Road Maroochydore.

s.73 irrelevant information

Giles and Pitts Pty Ltd has never reformulated any claim against Mobil Australia Pty Ltd and any correspondence to the contrary is a fabrication of the truth. The complainant demanded financial reimbursement from the company IT Environment (Australia) Pty Ltd, this was not forthcoming. Giles and Pitts Pty Ltd has indemnified the complainant to the total extent of claims made against Mobil Australia Pty Ltd during the remediation process directed by the Environmental Protection Agency.

In the letter dated 17th February 17, 2005 Mobil Australia Pty Ltd claims that representatives for Giles and Pitts Pty Ltd claimed that indemnity for the complainant had not been fulfilled. The representative for Giles and Pitts Pty Ltd did state that all invoices would need to be collaborated to provide correct and sustainable evidence for agents for Mobil Australia Pty Ltd. This evidence will be forthcoming in a timely manner as per all Giles and Pitts Pty Ltd actions in regards to claims against Mobil Australia Pty Ltd and its contractors.

Government documentation can prove that Mobil Australia Pty Ltd claim for depreciation can be found to be negligible.

0754432046

The issue is not SITE ACCESS but Mobil Australia Pty Ltd continued denial of written contractual agreements. Giles and Pitts Pty Ltd is not at fault as to the environmental degradation that Mobil Australia Pty Ltd caused. The remediation notice issued to Mobil Australia Pty Ltd by the Environmental Protection Agency should have been fulfilled prior to the action served against Mobil Australia Pty Ltd. This remediation should have been conducted for community health and not statutory obligations. Giles and Pitts Pty Ltd entered into the ACCESS AGREEMENT in good faith. Mobil Australia Pty Ltd has resorted to stand over tactics and intimidations to uphold its statutory obligations. Whilst holding an attitude of aggression towards its contractual partners in the remediation process.

The demand for Giles and Pitts Pty Ltd to comply with your unprofessional request to respond to correspondence in a manner that involves minimum deliberation and for thought. Shows how the company Mobil Australia Pty Ltd cares little for its partners, in the cleanup of Mobil Australia Pty Ltd environmental degradation. I refer to a conversation from the complainant on the 7th June 2004, at 1340 Hours Australian Eastern Standard Time were agents for Mobil Australia Pty Ltd (Mr. John Porter) denied correspondence due to insufficient time frames involved. Your demand for unconditional access is illegitimate, the Environmental Protection Act 394 and the ACCESS AGREEMENT signed on the 23rd January 2001, clearly stipulate the conditions of site access. Giles and Pitts Pty Ltd urges Mobil Australia to review documents before making any demands of Giles and Pitts Pty Ltd.

Giles and Pitts again demands Mobil Australia Pty make available legal council and provide for litigation costs associated against IT Environment (Australia) Pty Ltd for damage sustained to property directly related to access to site 120 Sugar Road, Maroochydore. Giles and Pitts Pty Ltd again refer Mobil Australia Pty Ltd to the ACCESS AGREEMENT #3b. Your immediate correspondence would be greatly appreciated by the close of business today, 5.00pm 18th February, 2005.

Yours Sincerely

sch4p4(6) Personal information

*Guyton L. Giles
Operations Manager Giles and Pitts Pty Ltd*

0754432046



Porter Davies LAWYERS

to: Mr Guyton Giles
fax no: 07 3023 2046
from: John Porter
our ref: JBP:15
subject: MOGIL OIL AUSTRALIA PTY LTD - IMPLEMENTATION OF REMEDIATION ACTION PLAN AND COMMISSIONING OF EXTRACTION SYSTEM

company: Giles & Pina Pty Ltd (Midas Muffler)
date: 25 June 2004
number of pages:
your ref:

We refer to your most recent facsimile received this afternoon.

In the writer's recent telephone conversation with you, we endeavoured to make it very clear to you that the suggestion that our client would institute Supreme Court proceedings to gain access to your property was never intended as a threat.

Our client was under increasing pressure from the EPA to commission the extraction system in its totality at the earliest possible time to avoid the increasing prospect of an increasing threat to public health and the environment.

The EPA requested our client to take whatever action was necessary to gain access and, in the final analysis, the foreshadowed Supreme Court proceedings were the "last resort" for our client.

Our client does not engage in litigation unless and until all other avenues have been exhausted and given the very real and increasing pressure from the EPA, felt that its options were being exhausted.

We have written to you on several occasions this week requesting you to properly quantify and validate the claim which you have made. Our client is a very large corporation and there is a validation process involved in establishing the merits of claims made against it and the payment of those claims.

We have already agreed to expedite consideration of your claim. The writer will fully comply with that commitment and hopefully the matter can then be resolved to your satisfaction.

The issue of the repair to the fence is being referred to IT Environmental (Australia) Pty Ltd this afternoon.

We feel certain that they will adopt a responsible attitude to it and repair it if it is in need of repair.

We thank you for the responsible attitude you have adopted to the larger issue of public health and preservation of the environment and look forward to working amicably with you to resolve any further issues that may arise.

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Level 6 Christa Corporate
303 Adelaide Street
Brisbane Queensland 4000

PO Box 10171
Brisbane Adelaide Street
Queensland 4000

Phone: 07 3023 4701
Fax: 07 3019 8771
Email: jbp@porterdavies.com

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0754432046

NO. 778 032

25 June, 2004

Page 2

Hopefully, the extraction program can now commence and be successfully completed in the shortest possible timeframe so that all contamination of the site is effectively eliminated.

Yours faithfully

[REDACTED]
ch4p4(6) Personal informationJohn B Porter
PORTER DAVIES

cc

[REDACTED]
s78B(2) - Personal Information

RTI DL RELEASE - EHP

0754432046

25.04

ALTHOUGH WE BELIEVE YOUR THREAT TO
GO TO THE SUPREME COURT IS TOTALLY
UNREASONABLE, WHEN THE MATTER COULD HAVE
BEEN RESOLVED EASILY BY YOUR ACCEPTANCE
OF YOUR RESPONSIBILITIES.

AS YOU HAVE AGREED TO ENDORSE
OUR CLAIM, AS QUICKLY AS POSSIBLE WE ARE
PREPARED TO ALLOW ACCESS TO OUR
PROPERTY.

WE DO HOWEVER REQUIRE YOU TO
PROFESSIONALLY REPAIR THE FENCE WITHIN
SEVEN DAYS. IF THIS CLAIM IS NOT RESOLVED
WE RESERVE THE RIGHT TO COMMENCE
LEGAL ACTION.

Regards,

sch4p4(6) Personal information

Gordon L. Gines,

0754432046

Porter Davies LAWYERS

Your Reference

JBP/615

Our Reference

John Porter 3023 4701

Contact

23 April 2004

The Manager
Giles & Pitts (Trading as Midas Car Care)

AND TO

The Manager
North Coast 4 x 4 Accessories
120 Sugar Road
MAROOCHYDORE QLD 4808

BY FACSIMILE: 07 5443 2046

Dear Sirs

ACCESS AGREEMENT - REMEDIATION WORKS

We refer to the writer's recent telephone conversation with Mr Graham Giles and confirm that we met for Mobil Oil Australia Pty Ltd.

We have read our client's letter to you (signed by Mr Greg Bond) dated 2 October 2001 in which our client agreed to pay you (and North Coast 4 x 4 Accessories) an amount of \$2,000 per day (each) by way of compensation for access being denied to the workshops operated by your respective businesses during normal business hours.

In that letter, our client agrees that normal business hours are 7:00am - 6:00pm Monday to Friday and 7:00am - 2:00pm on Saturday.

We confirm that there are two workshops involved and under the terms of the current agreement, if access were denied to both workshops for a day or any part thereof, then a total amount of \$4,000 per day would be payable to you for the denial of access.

\$2,000 of this would be payable to Midas Car Care and the balance would be payable to the proprietor of North Coast 4 x 4 Accessories.

As we understand it, you wish our client to agree to increase the amount payable to \$4,000 per day (or part thereof) for each of two workshops, one operated by you and one operated by North Coast 4 x 4 Accessories.

Our client agrees to this payment in the event that access is denied as a consequence of works being carried out on the site by our client's contractors.

Yours faithfully

sch4p4(6) Personal information

John B Porter
PORTER DAVIES



Your ref:

Our ref: JBP:0000415

23 February 2005

Mr Guyton Giles
Operations Manager
Giles & Pitts Pty Ltd
120 Sugar Road
MAROOCHYDORE QLD 4558

BY FACSIMILE: 5443 2046

Dear Sir

SITE ACCESS – MOBIL OIL AUSTRALIA PTY LTD ("MOBIL")

Last Friday (18 February 2005), we endeavoured to transmit a letter to you via facsimile. For reasons not entirely clear to us, the facsimile transmission was not successful. We endeavoured to repeat that transmission last Saturday morning (19 February 2005) but, once again, we were unable to successfully complete the transmission.

We **enclose** a copy of the letter which we endeavoured to transmit to you last Friday and Saturday.

It was intended that the letter constitute a formal notice to you pursuant to section 394 of the *Environmental Protection Act 1994*.

A copy of that letter was sent to [REDACTED] also by way of formal notification for the purposes of section 394 of the *Environmental Protection Act 1994*.

Under that section, our client and its contractor are required to give you seven days notice of entry to the relevant site.

Clearly, we cannot now do that in view of our inability to communicate with you via facsimile.

The purpose of this letter is to send you a copy of our letter dated 18 February 2005.

We reaffirm that letter in every respect as a notice pursuant to section 394 of the *Environmental Protection Act 1994* save that our client and its contractor will now enter the land on Sunday, 6 March 2005 at 9:00am.

The work that our client, by its contractor, proposes to carry out is the work referred to in our letter dated 18 February 2005 and more specifically identified in the letter from IT Environmental (Australia) Pty Ltd dated 9 December 2004, a copy of which was annexed to our letter dated 18 February 2005.

We have sent a copy of this letter and its enclosure to your landlord.

Please note: As from 31 January 2005 we have moved premises. Please update your records with our new contact details.

Email: enquiries@porterdavies.com
Web: www.porterdavies.com

Level 5, 46 Edward Street, Brisbane 4000
Postal GPO Box 2942, Brisbane 4001
Tel 07 3001 2100 - Fax 07 3319 6770

636 Moggi Road Chapel Hill Qld 4069
Tel 07 3878 8800 - Fax 07 3878 3633

- 2 -

If entry is not facilitated to our client, by its contractor, in terms of this letter, then a formal court order will be obtained without any further reference to you.

If our client is required to take this action, then it will be looking to you to pay all of its costs associated with that application.

Yours faithfully

sch4p4(6) Personal information

PORTER DAVIES

Encl

Contact person: John Porter
Direct line: 07 3001 2101
Direct fax: 07 3319 6770
Email: jbp@porterdavies.com

RTI DL RELEASE - EHP



Your ref:

Our ref: JBP:0000415

23 February 2005

s78B(2) - Publication Prevented by Law

Aria Ventures Pty Ltd
GPO Box 2344
BRISBANE QLD 4001

BY FACSIMILE: 3229 9939

Dear Sir

120 SUGAR ROAD, MAROOCHYDORE

On 18 February 2005, we sent you a letter concerning the refusal of your tenant Giles & Pitts Pty Ltd (by its "Operations Manager" Guyton Giles) to permit our client, by its contractor (It Environmental (Australia) Pty Ltd) access to the site for the proper and legitimate purposes associated with its remediation.

Unfortunately, we were unable to successfully complete the facsimile transmission of a letter in similar terms to Giles & Pitts Pty Ltd.

We enclosed a copy of that letter in our facsimile to you dated 18 February 2005.

We have sent a further letter to Mr Giles and we enclose a copy of that letter for your information.

s.73 irrelevant information

The larger issue, of course, is the overriding public interest in having the contamination remediated. s.73 irrelevant information

s.73 irrelevant information

Please note: As from 31 January 2005 we have moved premises. Please update your records with our new contact details.

Email: enquiries@porterdavies.com
Web: www.porterdavies.com

Level 5, 46 Edward Street, Brisbane 4000
Postal GPO Box 2942, Brisbane 4001
Tel 07 3001 2100 - Fax 07 3105 7360

636 Moggill Road Chapel Hill Qld 4069
Tel 07 3878 8800 - Fax 07 3878 3633

- 2 -

Under the terms of your lease with Giles & Pitts Pty Ltd, you have full authority to direct the lessee to grant access to the site for the purposes for which access is now required.

We would like you to seriously consider taking that initiative.

The matter has been long running and the EPA are becoming increasingly frustrated and impatient at the delays that have occurred in the proper remediation of contamination of your site and the adjacent service station site.

If Mr Giles persists in his denial of access, then our client will be left with no option other than to seek and obtain an appropriate court order compelling your tenant to grant access.

When you have had the opportunity of reading this letter (and discussing the matter with your tenant), we would appreciate a telephone call from you.

Yours faithfully

sch4p4(6) Personal information

PORTER DAVIES

Contact person: John Porter
Direct line: 07 3001 2101
Direct fax: 07 3105 7360
Email: jbp@porterdavies.com

Encl

RTI DL RELEASE - EHP



Porter Davies LAWYERS

to: Mr G O'Brien
fax no: 3227 7677
from: John Porter
our ref: JBP:0000415
subject: SUGAR ROAD, MAROOCHYDORE

company: Environmental Protection Agency
date: 18 February 2005
pages:
your ref:

Please see **attached**.

RTI DL RELEASE - EHP

Please note: As from 31 January 2005 we have moved premises. Please update your records with our new contact details.

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Email: enquiries@porterdavies.com
Web: www.porterdavies.com

Level 5, 46 Edward Street, Brisbane 4000
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Tel 07 3001 2100 - Fax 07 3105 7360

636 Moggill Road Chapel Hill Qld 4069
Tel 07 3878 8800 - Fax 07 3878 3633

**Porter Davies** LAWYERS

Your ref:

Our ref: JBP:0000415

18 February 2005

sch4p4(6) Personal information

GPO Box 2344
BRISBANE QLD 4001

BY FACSIMILE: 3229 9939

Dear Sir

120 SUGAR ROAD, MAROOCHYDORE

We refer to the writer's telephone conversation with you today concerning the above.

We confirm that you are the registered proprietor of land situated at 120 Sugar Road, Maroochydore and described as lot 2 on RP 176929, County Canning, Parish Mooloolah, title reference 16128121.

That land is leased to Giles & Pitts Pty Ltd and, for the purposes of section 394 of the *Environmental Protection Act 1994*, Giles & Pitts Pty Ltd is an occupier of that land and you are clearly the owner.

Since 9 December 2004, our client (Mobil Oil Australia Pty Ltd), by its contractor, IT Environmental (Australia) Pty Ltd has been endeavouring to procure the agreement of the occupier to enter the land for the purpose of remediation pursuant to the terms of a remediation notice served on our client by the Environmental Protection Agency dated 24 October 2002.

We enclose a copy of a letter sent to Giles & Pitts Pty Ltd, your lessee and an occupier for the purposes of section 394 of the *Environmental Protection Act 1994* (copy enclosed).

The occupier has failed, neglected or refused to agree to grant our client (and its contractor) access to the land.

At the expiration of seven days from the date of this notice, our client has instructed us take such court proceedings as may be necessary and appropriate to gain access to the land for the purposes set out in the letter from IT Environmental (Australia) Pty Ltd to Giles & Pitts Pty Ltd dated 9 December 2004.

We have read the lease between yourself and the occupier. Clearly, under it, it is open to you to direct the lessee to grant our client (and its contractor) access to the land for the purpose of enabling our client (and the contractor on its behalf) to comply with the terms of the remediation notice.

It would be expedient if you were to issue an appropriate direction to the lessee.

Please note: As from 31 January 2005 we have moved premises. Please update your records with our new contact details.

Email: enquiries@porterdavies.com
Web: www.porterdavies.comLevel 5, 46 Edward Street, Brisbane 4000
Postal GPO Box 2942, Brisbane 4001
Tel 07 3001 2100 - Fax 07 3105 7360636 Moggill Road Chapel Hill Qld 4069
Tel 07 3978 8800 - Fax 07 3978 3633

- 2 -

If our client (and its contractor) is not granted access to the land in one way or another, then it will have no alternative other than to seek an appropriate order for a court of competent jurisdiction.

Yours faithfully

sch4p4(6) Personal information

PORTER DAVIES

Encl

Contact person: John Porter
Direct line: 07 3001 2101
Direct fax: 07 3105 7360
Email: jbp@porterdavies.com

RTI DL RELEASE - EHP

**Porter Davies** LAWYERS

Your ref:

Our ref: JBP:0000415

18 February 2005

Mr Guyton Giles
Operations Manager
Giles & Pitts Pty Ltd
120 Sugar Road
MAROOCHYDORE QLD 4558

BY FACSIMILE: 5443 2046

Dear Sir

SITE ACCESS – MOBIL OIL AUSTRALIA PTY LTD ("MOBIL")

We refer to your letter dated 17 February 2005 and confirm that we continue to act for Mobil.

Until 11 February 2001, Mobil was the registered lessee pursuant to registered lease number 701896484 ("**Registered Lease**") of land described as lot 1 on RP 176929, County Canning, Parish Mooloolah, title reference 16128120 ("**Contaminated Land**"). The Contaminated Land was owned by Balarang Pty Limited.

At all material times, land adjacent to the Contaminated Land and described as lot 2 on RP 176929, County Canning, Parish Mooloolah, title reference 16128121 ("**Adjacent Contaminated Land**") was owned by sch4p4(6) Personal information.

It is a matter of record that the Adjacent Contaminated Land is leased to Giles & Pitts Pty Ltd ("**Occupying Lessee**") pursuant to registered lease number 704222803 and you hold yourself out as the "operations manager" of that company, although it is a matter of record that you are neither a director nor the secretary of the Occupying Lessee.

It is common ground that, at some time prior to the expiry of the Registered Lease, a contaminating event occurred on the Contaminated Land which, with the passage of time, spread to and contaminated the Adjacent Contaminated Land.

It is also common ground that, on 24 October 2002, the Environmental Protection Agency served a remediation notice on Mobil requiring it to conduct or commission work to remediate both the Contaminated Land and the Adjacent Contaminated Land and prepare a remediation action plan directed to this work.

We enclose, for your information, and as a matter of record, a copy of that remediation notice.

As you are aware, our client engaged the services of IT Environmental (Australia) Pty Ltd ("**Contractor**") as its independent expert contractor for the purposes of preparing the remediation action plan and then implementing the work and installing the systems necessary to comply with the requirements of that plan.

Please note: As from 31 January 2005 we have moved premises. Please update your records with our new contact details.

Email: enquiries@porterdavies.com
Web: www.porterdavies.com

Level 5, 46 Edward Street, Brisbane 4000
Postal GPO Box 2942, Brisbane 4001
Tel 07 3001 2100 - Fax 07 3319 6770

636 Moggill Road Chapel Hill Qld 4069
Tel 07 3878 8800 - Fax 07 3878 3633

- 2 -

As you are aware, monitoring wells have been installed on the Adjacent Contaminated Land by the Contractor and, from time to time, pursuant to the terms of the remediation action plan, the Contractor is required to access those monitoring wells for the purpose of routine monitoring of the progress being made in the remediation and for other maintenance tasks.

On 9 December 2004, the Contractor sent you a letter telling you of its need to enter the Adjacent Contaminated Land for all of the purposes specified in that letter.

We enclose a copy of that letter for your information and for the record.

Since sending you that letter, the Contractor has endeavoured to procure your agreement to enter the Adjacent Contaminated Land for routine monitoring and maintenance tasks.

For whatever reason, and despite continuing dialogue with you, you have failed to agree to grant the Contractor access to the Adjacent Contaminated Land.

s.73 irrelevant information

s.73 irrelevant information

This issue is irrelevant to the question of access to the Adjacent Contaminated Land and neither the Contractor nor Mobil is prepared to consider your unrelated claim for damages (and capitulate to your demands) in the context of our client's quite clear statutory obligations to comply with the remediation notice.

Under section 394 of the *Environmental Protection Act 1994*, Mobil is the recipient of a notice (to conduct or commission work to remediate contaminated land and IT Environmental (Australia) Pty Ltd is a contractor).

Under that section, our client and the Contractor can only enter land (in the context of this letter, the land is the Adjacent Contaminated Land) with the consent of the owner and occupier of the Land or, if Mobil or the Contractor has given, at least, seven days written notice to the owner and occupier.

Clearly, the owner is [sch4p4(6) Personal information] and by virtue of the lease under which the Occupying Lessee occupies the Adjacent Contaminated Land, the Occupying Lessee is an occupier.

The purpose of this letter is to give the Occupying Lessee notice pursuant to section 394 of the *Environmental Protection Act 1994*.

You are hereby given notice of our client's intention to enter the Adjacent Contaminated Land for all of the purposes specified in the letter from the Contractor to you dated 9 December 2004.

It is the intention of our client and its Contractor to enter the land on Sunday, 27 February 2005 at 9:00am. The work described in the letter to you dated 9 December 2004 will take the entire day and it is the intention of our client and the Contractor to exit the site no later than 5:00pm on that day.

If you fail to grant our client and its Contractor access to the Adjacent Contaminated Land pursuant to this notice, then our client will pursue all of the remedies available to it under section 394.

Yours faithfully,

[sch4p4(6) Personal information]

PORTER DAVIES

Encl

Contact person: John Porter
Direct line: 07 3001 2101
Direct fax: 07 3319 6770
Email: jbp@porterdavies.com



FAXED

FAXED

IT Environmental (Australia) Pty Ltd
ABN: 89 003 931 057

Unit 7, 20 Smallwood Place
Muramba QLD 4172
Tel: (07) 3899 8359
Fax: (07) 3899 9692
Email: iberger@itanviro.com.au

www.itanviro.com.au



FACSIMILE

To:	Graham Giles, Giles & Pitts Pty Ltd (Midas Muffler)	Fax No.:	07 5443 2046
cc:	Sean Mulcair, Mobil	Fax No.:	03 9286 5233
From:	Tracy Berger		
Date:	9 December 2004	Page 1 of:	3

Re: Proposed site visit on 13 December 2004

Dear Graham

We refer to the Site Access Agreement entered into by your company (Giles and Pitts Pty Ltd) and Mobil Oil Australia (Mobil) Pty and the terms of the Queensland Environmental Protection Agency's (EPA's) Remediation Notice to Mobil pertaining to Lots 1 & 2 on RP176929.

Under the terms of the Remediation Notice and the EPA-approved Remediation Action Plan, IT Environmental, on behalf of Mobil, are operating a pumping system to extract and treat contaminated groundwater from both Lots 1 & 2. As you are aware, several of the extraction wells are on the property you lease from **4p4(6) Personal info** (Lot 2, also known as 120 Sugar Road). You would also be aware, therefore, that from time to time IT Environmental will need access to these wells to perform routine monitoring and maintenance tasks.

We will be making routine system checks on Monday 13 December 2004 and therefore would appreciate having access to the wells located on Lot 2 at that time. A plan showing the well locations on Lot 2 is attached. Our access to Lot 2 will not involve any heavy equipment or vehicles - just field personnel opening the wells to check on the wellhead fittings and the like. Assuming no maintenance or repairs are needed to the well heads, the checks should take no longer than two hours. Our field supervisor can meet with you on the day to discuss a mutually suitable time.

If we are able to access the wells on Lot 2 on Monday 13 December, please indicate your agreement by signing in the space below and faxing the signature back to us on (07) 3899 9692. If we are unable to access the wells on this date, then we request that you nominate a date and time that is acceptable to you.

Please contact the undersigned on (07) 3899 8359 should you have any questions.

Regards

sch4p4(6) Personal information

Tracy Berger
State Manager, QLD/NT

☐ *IT Environmental is hereby authorised to access the eight (8) wells located on Lot 2 on RP176929 (120 Sugar Road) on Monday 13 December 2004.*

☐ *The alternative date of _____, between the hours of _____ and _____ is suitable to Giles & Pitts Pty Ltd (Midas Muffler), as lessee of Lot 2 on RP176929, and we will grant IT Environmental access to the eight wells at that time.*

Authorised Signature for Giles & Pitts Pty Ltd

Date

Printed Name and Title

25-OCT-2002 FRI 14:14

CONTAM LAND UNIT - EFA
07 32473278

FAX NO. 07 32473278

P. 02

**Queensland
Government**

Enquiries: Greg O'Brien
Telephone: 07 32277000
Your reference:
Our Reference: BN29848

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

24 October 2002

Mobil Oil Australia Pty Ltd
Attention: The Company Secretary
417 Saint Kilda Road
Melbourne VIC 3004

Dear Sir/Madam

Remediation Notice

Environmental Protection Act 1994 (EP Act), Section 391

***Lot 1 RP176929, 116-118 Sugar Road Alexandra Headland
Lot 2 RP176929, 120 Sugar Road Alexandra Headland***

Former Mobil Service Station, 120 Sugar Road Maroochydore, Queensland

- Environmental Site Assessment, Mobil Service Station, 120 Sugar Road Maroochydore Qld, prepared by Handex Australia Pty Ltd, dated 2 February 2001.
- Additional Well Installation, Former Mobil Service Station, 120 Sugar Road Maroochydore Qld, prepared by Handex Australia Pty Ltd, dated 20 December 2001.
- Multi-Phase Extraction Program Summary Report, Former Mobil Service Station, 120 Sugar Road Maroochydore Qld, prepared by Handex Australia Pty Ltd, dated 13 February 2002
- Additional Well Installation, Former Mobil Service Station, 120 Sugar Road Maroochydore Qld, prepared by Handex Australia Pty Ltd, dated 19 July 2002.

I refer to the submission of the above reports, the additional information received by the Environmental Protection Agency (EPA) and the recent listing of the above referenced lots on the Contaminated Land Register (CLR), as notified by the Notice of Decision pursuant to section 384 of the *Environmental Protection Act 1994 (EP Act)*, dated 8 October 2002.

Page 1 of 6

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288 Edward Street Brisbane
Queensland 4000 Australia
PO Box 155 Brisbane Albert Street
Queensland 4002 Australia
Telephone
Facsimile
Website www.epa.qld.gov.au
ABN 87 221 156 788

25-OCT-2002 FRI 14:14

CONTAM LAND UNIT - E141
07 32473278

FAX NO. 07 32473278

P. 03

In accordance with section 391 (1) (a) of the *EP Act*, the EPA requires the conduct or commission of work to remediate Lot 1 RP176929 and Lot 2 RP 176929.

Please be advised the recipient of this Remediation Notice, as required pursuant to section 391 (5) (b) of the *EP Act* is Mobil Oil Australia Pty Ltd.

Work to be conducted or commissioned

In accordance with section 391 (5) c of the *EP Act*, a Remediation Action Plan (RAP) must be submitted to the EPA by close of business on 11 November 2002 to address the site contamination. The RAP must include, but not be limited to, the following components.

1. General requirements.

The RAP must include works to ensure that the land and associated groundwater no longer poses a risk of serious environmental harm including harm to human health through the presence of petroleum hydrocarbon contamination on Lot 1 RP176929 and Lot 2 RP176929.

Provision must be made to protect the environment during site works to prevent the emission of offensive petroleum hydrocarbon odours and the transport of contaminants from the site by rainwater, wind borne dust or other means.

The recipient must provide written evidence in the RAP of advice provided to the Local Authority and other relevant service providers (eg Telstra) of the contamination status of the site, the known and probable extent of contamination and the risks associated with penetration of in-ground services by petroleum hydrocarbon contamination.

2. Extent of contamination.

The remediation works must include investigations to fully delineate the extent of the petroleum hydrocarbon plume and soil contamination and ensure that the source of any hydrocarbons leaks are identified and fully rectified.

3. Site outcomes.

The RAP must include a detailed works program that is sufficient, following implementation and validation under the requirements of the *EP Act*, to enable the EPA to remove Lot 2 RP176929 from the CLR and the Environmental Management Register (EMR) or any other land (other than Lot 1 on RP176929) which has been impacted by the petroleum hydrocarbon contamination.

25-OCT-2002 FRI 14:14

CONTAM LAND UNIT - E14
07 32473278

FAX NO. 07 32473278

P. 04

The remediation program must also include a Site Management Plan which details a strategy for the ongoing management of Lot 1 RP176929. This lot will remain listed on the EMR while the notifiable activity continues following implementation and validation of the RAP.

4. *Work quality, certification by Third Party Reviewer.*

All site works must be conducted according to the Queensland Government's draft *Guidelines for the Assessment and Management of Contaminated Land in Queensland, May 1998* and the *National Environment Protection (Assessment of Site Contamination) Measure, December 1999*.

The RAP and its implementation must be reviewed and certified by a person who is a member of a prescribed organization and who has qualifications and experience relevant to site contamination issues. The person must be accepted under the EPA's Terms of Reference for Third Party Reviewer (TPR) or be an environmental auditor (contaminated land) accredited in the New South Wales or Victorian Government jurisdictions and be eligible for appointment as TPR. The certification relating to the RAP must be submitted concurrently with the documented RAP.

5. *Implementation of the RAP*

Implementation of the RAP must commence within 7 days of provision of the RAP by the EPA, proceed expeditiously and be completed within 60 days from the date of commencement. The recipient must provide written monthly progress reports on the remediation work to the EPA from the date of commencement. The EPA may consider extensions of the remediation period.

Approval to remove contaminated soil

Pursuant to section 391 (5) (d) of the *EP Act*, the EPA approves of any measures to remove, treat and dispose of soil from Lot 1 RP176929 and Lot 2 RP176929 as required to achieve the required outcomes of the remediation program subject to the application processes required under Section 424 of the *EP Act*.

Validation report

As required in accordance with section 391 (5)(e), Mobil Oil Australia Pty Ltd must submit a validation report according to the requirements of the *EP Act* to the EPA within 30 days of the completion of the remediation works.

25-OCT-2002 FRI 14:15

CONTAM LAND UNIT - EHP
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FAX NO. 07 32473278

P. 05

Under Section 521 of the EP Act, the owners of the above referenced land parcel may apply to the administering authority (EPA) for a review of this decision within 14 days after receiving this Notice. Information outlining the review and appeal processes under the EP Act is included in this Notice. This information is intended as a guide only. You may have other legal rights and obligations.

Should you have any further questions regarding this Notice, please contact the undersigned on telephone (07) 32277000.

Yours sincerely,

sch4p4(6) Personal information

Greg O'Brien
Chief Scientific Advisor Contaminated Land
Delegate of the Administering Authority

Cc.

sch4p4(6) Personal information

Attention: Mr Dennis Ryan
Balaring Pty Limited
Johnstone Rocks, Level 5 N A B House
255 Adelaide Street
BRISBANE QLD 4000

25-OCT-2002 FRI 14:15

CONTAM LAND UNIT - EFA
07 32473278

FAX NO. 07 32473278

P. 06

Extracts from the *Environmental Protection Act 1994* regarding Tribunal Appeals

Procedure for review

S21

- (1) A dissatisfied person may apply for a review of an original decision.
- (2) The application must—
 - (a) be made in the approved form to the administering authority within—
 - (i) 14 days after the day on which the person receives notice of the original decision or the administering authority is taken to have made the decision (the "review date"); or
 - (ii) the longer period the authority in special circumstances allows; and
 - (b) be supported by enough information to enable the authority to decide the application.
- (3) On or before making the application, the applicant must send the following documents to the other persons who were given notice of the original decision—
 - (a) notice of the application (the "review notice");
 - (b) a copy of the application and supporting documents.
- (4) The review notice must inform the recipient that submissions on the application may be made to the administering authority within 7 days after the application is made to the authority.
- (5) If the administering authority is satisfied the applicant has complied with subsections (2) and (3), the authority must, within 14 days after receiving the application—
 - (a) review the original decision; and
 - (b) consider any submissions properly made by a recipient of the review notice; and
 - (c) make a decision (the "review decision") to—
 - (i) confirm or revoke the original decision; or
 - (ii) vary the original decision in a way the administering authority considers appropriate.
- (6) The application does not stay the original decision.
- (7) The application must not be dealt with by—
 - (a) the person who made the original decision; or

25-001-2002 FRI 14:16

CONTAM LAND UNIT - EFM
07 32473278

FAX NO. 07 32473278

P. 07

- (b) a person in a less senior office than the person who made the original decision.
- (8) Within 14 days after making the review decision, the administering authority must give written notice of the decision to the applicant and persons who were given notice of the original decision.
- (9) The notice must—
(a) include the reasons for the review decision; and
(b) inform the persons of their right of appeal against the decision.
- (10) If the administering authority does not comply with subsection (5) or (8), the authority is taken to have made a decision confirming the original decision.
- (11) Subsection (7) applies despite the *Acts Interpretation Act 1954*, section 27A.¹⁰⁷
- (12) This section does not apply to an original decision made by—
(a) for a matter, the administration and enforcement of which has been devolved to a local government—the local government itself or the chief executive officer of the local government personally; or
(b) for another matter—the chief executive personally.

Who may appeal

531.

- (1) A dissatisfied person who is dissatisfied with a review decision, other than a review decision to which subdivision 1 applies, may appeal against the decision to the Court.
- (2) The chief executive may appeal against another administering authority's decision (whether an original or review decision) to the Court.
- (3) A dissatisfied person who is dissatisfied with an original decision to which section 521 does not apply may appeal against the decision to the Court.

0754432046



18.2.2005

ATTN: MR GREG O'BRIEN
FROM: GILES & PITTS PTY LTD.
PAGES: 1 of 6.

DEAR GREG,

PLEASE FIND INCLOSED RECENT
CORRESPONDENCE FROM MOBIL AUSTRALIA PTY LTD.
THE LETTERS NATURE IS VERY AGGRESSIVE
AND CAN BE PROVEN TO DEVIATE FROM
STATUTORY OBLIGATIONS OUTLINED IN
THE ENVIRONMENTAL PROTECTION ACT 394.

GILES AND PITTS PTY LTD THANKS
YOU FOR YOUR CONTINUED SUPPORT.

YOURS SINCERLY

sch4p4(6) Personal information

GUYTON L GILES
GILES AND PITTS PTY LTD

17-FEB. 05 (THU) 13:00

0754432046

**Porter Davies** LAWYERS

Your ref:

Our ref: JBP:0000415

17 February 2005

Mr Guyton Giles
Operations Manager
Giles & Pitts Pty Ltd
120 Sugar Road
MAROOCHYDORE QLD 4558

BY FACSIMILE: 5443 2045

Dear Sir

SITE ACCESS

We refer to your successive letters to us dated 5 January 2005, 31 January 2005 and 11 February 2005.

At a recent meeting with you at Maroochydore, attended by the writer, Mr Sean Mulcair and Ms Tracy Berger, a number of issues were discussed with you.

s.73 irrelevant information

For the record, you have alleged that you have suffered loss and damage as a direct consequence of activities on the site by Mobil's independent contractor, IT Environmental (Australia) Pty Ltd.

Mobil has no legal liability for the activities of its independent contractor and consequently denies any liability for any actions by IT Environmental (Australia) Pty Ltd which may have led to a sustainable claim by you for loss and damage which you have suffered.

This should not be construed as any admission that you have suffered any loss or damage as a result of activities on site by IT Environmental (Australia) Pty Ltd, nor should it be construed as any admission that you have suffered loss and damage of the magnitude which you claim.

After we originally wrote to you denying any liability by Mobil, you endeavoured to reformulate your claim as a claim by Giles & Pitts Pty Ltd for an indemnity pursuant to the site access agreement.

Please note: As from 31 January 2005 we have moved premises. Please update your records with our new contact details.

Email: enquiries@porterdavies.com
Web: www.porterdavies.com

Level 5, 46 Edward Street, Brisbane 4000
Postal GPO Box 2842, Brisbane 4001
Tel 07 320 2100 - Fax 07 3319 6770

636 Moggi Road Chapel Hill Qld 4068
Tel 07 3878 8800 - Fax 07 3878 3835

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Release

17-FEB-05 (THU) 13:00

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- 2 -

s.73 irrelevant information

s.73 irrelevant information

The larger issue, of course, is your continuing failure to give access to the site which Giles & Pitts Pty Ltd leases from (6) Personal Information. Our client is under a statutory obligation to comply with the original remediation notice served on it and has a statutory obligation to comply with the remediation action plan.

Our client's contractor, IT Environmental (Australia) Pty Ltd, requires access to the site for the limited purpose of inspecting and taking samples from the monitoring wells installed on the site and will do this either with your agreement or, if you continue to withhold your agreement, will do it pursuant to a statutory notice served under the *Environmental Protection Act*.

Our client requires you to consent to its entry to the site (by its contractor) for the purpose of accessing the monitoring wells installed on it and our client requires you to grant that consent unconditionally prior to 5:00pm today, 17 February 2005.

If you do not do so, then the requisite notices will be served on you, Giles & Pitts Pty Ltd and your landlord and any subsequent action necessary to enforce access to the site pursuant to those notices will then be taken without any further reference to you.

An early response from you would be appreciated.

Yours faithfully

sch4p4(6) Personal information

Encl

PORTER DAVIES

Contact person: John Porter
Direct line: 07 3001 2101
Direct fax: 07 3318 6770
Email: jbp@porterdavies.com

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0754432046

February 17, 2005

To: Mobil Australia Pty Ltd
C/- Porter Davies Lawyers
Level 5, 46 Edward Street
Brisbane, Queensland 4001

Att. John Porter

Dear Sir,

Giles and Pitts direct you to your letter dated 17th February, 2005. You have headed your letter SITE ACCESS, the previous correspondence from Giles and Pitts Pty Ltd has not in any way regarded SITE ACCESS. The issue at hand is for Mobil Australia Pty Ltd to comply with its stated contractual agreements. The letters dated 6th January 2005, 31st January 2005 and 11th February 2005 directly relate to the agreement signed by Mobil Australia Pty Ltd on the 23rd January, 2001. Any correspondence to the contrary is a fabrication of the truth. I refer you to the letter dated 25th June, 2004.

In a meeting with agents for Mobil Australia Pty Ltd and IT Environment (Australia) Pty Ltd a number of issues were discussed. These issues directly related to the claim against Mobil Australia Pty Ltd. The conversation did discuss SITE ACCESS and agents for Giles and Pitts Pty Ltd did state that all requests for SITE ACCESS would be handled in a business manner and resolved with minimum disruption to the remediation process prescribed by The Environmental Protection Agency Section 391 Remediation Notice. Any correspondence to the contrary is a fabrication of the truth. Giles and Pitts Pty Ltd maintain a commitment to the environment and Giles and Pitts Pty Ltd has shown this in its actions to this date. Giles and Pitts Pty Ltd has responded promptly to all requests from Mobil Australia Pty Ltd and it is unfortunate that Mobil Australia Pty Ltd and IT Environment (Australia) Pty Ltd has had extremely poor time management skills in relation to dedicated correspondence to Giles and Pitts Pty Ltd.

In relations to demands from Giles and Pitts Pty Ltd, Giles and Pitts Pty Ltd have never demanded the amount of less/commercial from Mobil Australia Pty Ltd. Giles and Pitts Pty Ltd has requested and asked to be indemnified as per the access agreement dated 23rd January, 2001. This can be confirmed as per letters dated 31st January 2005, 6th January 2005, 13th December 2004, 23rd November 2004 and 7th September 2004. In the letter dated 17th February, 2005, Mobil Australia Pty Ltd clearly asks for evidence supporting the claim that Giles and Pitts Pty Ltd has in fact indemnified the complainant in total, this will be forthcoming in a timely manner. As per previous request, Giles and Pitts Pty Ltd will maintain a commitment to professionalism.

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The claim against Mobil Australia Pty Ltd is for the contractual stated agreement to be honored. Giles and Pitts Pty Ltd can comprehend the amount of loss/commercial as the claim is for the amount that Giles and Pitts Pty Ltd indemnified the complainant for the financial loss that was suffered as a direct result of the work performed on the site 120 Sugar Road Maroochydore.

IT Environment (Australia) Pty Ltd has admitted in previous dealings that the breach in the secure compound was sustained while civil works were being conducted on behalf of Mobil Australia Pty Ltd under the remediation action plan prescribed by Tracy Berger and approved by Dr Erwin Benker. Mobil Australia Pty Ltd, in a letter to the complainant dated 23rd July 2004, accepted that damage was sustained to the secure compound as a direct result of civil works carried out by Mobil Australia Pty Ltd and its' contractor IT Environment (Australia) Pty Ltd under the remediation notice issued by The Environmental Protection Agency on 24th October, 2004.

Giles and Pitts Pty Ltd has never reformulated any claim against Mobil Australia Pty Ltd and any correspondence to the contrary is a fabrication of the truth. The complainant demanded financial reimbursement from the company IT Environment (Australia) Pty Ltd, this was not forthcoming. Giles and Pitts Pty Ltd has indemnified the complainant to the total extent of claims made against Mobil Australia Pty Ltd during the remediation process directed by the Environmental Protection Agency.

In the letter dated 17th February 17, 2005 Mobil Australia Pty Ltd claims that representatives for Giles and Pitts Pty Ltd claimed that indemnity for the complainant had not been fulfilled. The representative for Giles and Pitts Pty Ltd did state that all invoices would need to be collaborated to provide correct and sustainable evidence for agents for Mobil Australia Pty Ltd. This evidence will be forthcoming in a timely manner as per all Giles and Pitts Pty Ltd actions in regards to claims against Mobil Australia Pty Ltd an it's contractors.

Government documentation can prove that Mobil Australia Pty Ltd claim for depreciation can be found to be negligible.

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The issue is not SITE ACCESS but Mobil Australia Pty Ltd continued denial of written contractual agreements. Giles and Pitts Pty Ltd is not at fault as to the environmental degradation that Mobil Australia Pty Ltd caused. The remediation notice issued to Mobil Australia Pty Ltd by the Environmental Protection Agency should have been fulfilled prior to the action served against Mobil Australia Pty Ltd. This remediation should have been conducted for community health and not statutory obligations. Giles and Pitts Pty Ltd entered into the ACCESS AGREEMENT in good faith. Mobil Australia Pty Ltd has resorted to stand over tactics and intimidations to uphold its statutory obligations. Whilst holding an attitude of aggression towards its contractual partners in the remediation process.

The demand for Giles and Pitts Pty Ltd to comply with your unprofessional request to respond to correspondence in a manner that involves minimum deliberation and for thought. Shows how the company Mobil Australia Pty Ltd cares little for its partners, in the cleanup of Mobil Australia Pty Ltd environmental degradation. I refer to a conversation from the complainant on the 7th June 2004, at 1340 Hours Australian Eastern Standard Time where agents for Mobil Australia Pty Ltd (Mr. John Porter) denied correspondence due to insufficient time frames involved. Your demand for unconditional access is illegitimate, the Environmental Protection Act 394 and the ACCESS AGREEMENT signed on the 23rd January 2001, clearly stipulate the conditions of site access. Giles and Pitts Pty Ltd urges Mobil Australia to review documents before making any demands of Giles and Pitts Pty Ltd.

Giles and Pitts again demands Mobil Australia Pty make available legal council and provide for litigation costs associated against IT Environment (Australia) Pty Ltd for damage sustained to property directly related to access to site 120 Sugar Road, Maroochydore. Giles and Pitts Pty Ltd again refer Mobil Australia Pty Ltd to the ACCESS AGREEMENT #3b. Your immediate correspondence would be greatly appreciated by the close of business today, 5.00pm 18th February, 2005.

Yours Sincerely

sch4p4(6) Personal information

*Guyton L. Giles
Operations Manager Giles and Pitts Pty Ltd*



IT Environmental (Australia) Pty Ltd

ABN: 89 003 931 057

Unit 7, 20 Smallwood Place

Murarie QLD 4172

Tel: (07) 3899 8359

Fax: (07) 3899 9692

Email: tberger@itenviro.com.au

www.itenviro.com.au



FACSIMILE

To:	Greg O'Brien, EPA	Fax No.:	3227 7677
cc:	Sean Mulcair, Mobil	Fax No.:	03 9286 5233
From:	Tracy Berger		
Date:	15 February 2005	Page 1 of:	7

Re: Update re: Guyton Giles and Access to Sugar Road, Maroochydore

Dear Greg

Pursuant to our discussions of this date regarding access to Lot 2 on RP176929, IT Environmental provides the attached correspondence between us and the tenant of Lot 2, Giles and Pitt Pty Ltd (operating a Midas Muffler franchise).

We note the following in response to the points raised by Guyton Giles s.73 irrelevant information

s.73 irrelevant information

Personnel from this office have had virtually no direct contact with Guyton Giles since our last groundwater monitoring round in June 2004 (and that access was gained under threat of a court order from Mobil's lawyer, John Porter).

s.73 irrelevant information

s.73 irrelevant information

s.73 irrelevant information

Therefore we are not sure what the "attitude of aggression" Mr. Giles refers to, means.

1. I explained to Mr. Giles in our meeting of 10 January 2005 that the complaints register is not a public document inasmuch as it may contain details of other complainants and would therefore not be appropriate for general viewing. I further explained that if Mr. Giles was concerned that his complaints weren't being duly noted, we wouldn't haven't sch4p4((a) issued the commercial exemption (b) attended the 10 January meeting.
2. Also in the 10 January meeting I assured Mr. Giles that the scope of work required to complete the remediation had not changed since the issue of the RAP, which he has a copy of. However, I did stress that for us to effect the remediation, we needed access to Lot 2.
3. Unsure what he means about this – in our discussion on 10 January I indicated that our "security policy" essentially amounted to us not being onsite without their knowledge and leaving the site as we found it or as they directed.



IT Environmental (Australia) Pty Ltd
ABN: 89 003 931 057

4. We are unaware of the "significant financial loss" referred to, as no further claims have been made to us [REDACTED] s.73 irrelevant information
5. We had already repaired the fence in question at the time Mr. Giles wrote the attached letter (on 24 July 2004, actually). He later acknowledged that the fence had been reinstated to his requirements in our 10 January meeting.
6. [REDACTED] s.73 irrelevant information
7. Unwarranted.
8. See above.

We provide the above information as it is our understanding that Mr. Giles continues to lodge grievances with the EPA in relation to IT. It is puzzling that Mr. Giles has not provided IT with any list of grievances. However, based on those attributed to Mr. Giles by the EPA in our discussion of today, we want to make it clear that we consider such claims to be:

- a) frivolous;
- b) malicious; and
- c) unsubstantiatable

Further documentation in the form of a status report will follow under separate cover.

Please do not hesitate to contact the undersigned on (07) 3899 8359 should you have any questions.

Regards

[REDACTED] sch4p4(6) Personal information

Tracy Berger
State Manager, QLD/NT



FAXED

FAXED

IT Environmental (Australia) Pty Ltd
 ABN: 89 003 931 057

Unit 7, 20 Smallwood Place
 Murarrie QLD 4172

Tel: (07) 3899 8359

Fax: (07) 3899 9692

Email: tberger@itenviro.com.au

www.itenviro.com.au



FACSIMILE

To:	Graham Giles, Giles & Pitts Pty Ltd (Midas Muffler)	Fax No.:	07 5443 2046
cc:	Sean Mulcair, Mobil	Fax No.:	03 9286 5233
From:	Tracy Berger		
Date:	9 December 2004	Page 1 of:	3

Re: Proposed site visit on 13 December 2004

Dear Graham

We refer to the Site Access Agreement entered into by your company (Giles and Pitts Pty Ltd) and Mobil Oil Australia (Mobil) Pty and the terms of the Queensland Environmental Protection Agency's (EPA's) Remediation Notice to Mobil pertaining to Lots 1 & 2 on RP176929.

Under the terms of the Remediation Notice and the EPA-approved Remediation Action Plan, IT Environmental, on behalf of Mobil, are operating a pumping system to extract and treat contaminated groundwater from both Lots 1 & 2. As you are aware, several of the extraction wells are on the property you lease from 4p4(6) Personal information (Lot 2, also known as 120 Sugar Road). You would also be aware, therefore, that from time to time IT Environmental will need access to these wells to perform routine monitoring and maintenance tasks.

We will be making routine system checks on Monday 13 December 2004 and therefore would appreciate having access to the wells located on Lot 2 at that time. A plan showing the well locations on Lot 2 is attached. Our access to Lot 2 will not involve any heavy equipment or vehicles – just field personnel opening the wells to check on the wellhead fittings and the like. Assuming no maintenance or repairs are needed to the well heads, the checks should take no longer than two hours. Our field supervisor can meet with you on the day to discuss a mutually suitable time.

If we are able to access the wells on Lot 2 on Monday 13 December, please indicate your agreement by signing in the space below and faxing the signature back to us on (07) 3899 9692. If we are unable to access the wells on this date, then we request that you nominate a date and time that is acceptable to you.

Please contact the undersigned on (07) 3899 8359 should you have any questions.

Regards

sch4p4(6) Personal information

Tracy Berger
State Manager, QLD/NT

☐ *IT Environmental is hereby authorised to access the eight (8) wells located on Lot 2 on RP176929 (120 Sugar Road) on Monday 13 December 2004.*

☐ *The alternative date of _____, between the hours of _____ and _____ is suitable to Giles & Pitts Pty Ltd (Midas Muffler) as lessee of Lot 2 on RP176929, and we will grant IT Environmental access to the eight wells at that time.*

Authorised Signature for Giles & Pitts Pty Ltd

Date

Printed Name and Title

8137E

Page 1

10th December, 2004

To: Tracy Berger, IT Environment (Australia) Pty Ltd

From: Guyton Giles, Giles and Pitts Pty Ltd

Date: 10th December, 2004

Re: Site access request

Dear Tracy

As you are well aware Mobil Australia Pty Ltd signed an access agreement with Giles and Pitts Pty Ltd. This access agreement outlined specific obligations of Mobil Australia Pty Ltd and its agents. This contractual agreement was a request from Mobile Australia Pty Ltd for itself or its agents to enter the site 120 Sugar Rd Maroochydore. The company Giles and Pitts hold grave concerns as to your companies ability to uphold these stated contractual agreements.

In recent history the company IT Environment has shown an attitude of aggression towards complaints made by Giles and Pitts Pty Ltd in regards to the scope of work carried out under the access agreement. To facilitate access to the site (Lot 2, also known as 120 Sugar Road) the company Giles and Pitts request the following.

1: A copy of the IT Environment (Australia) Pty Ltd complaints register, as per section 6.5 of the remediation action plan, prepared by Tracy Berger and approved by Dr. Erwin Benker on the 11th November, 2002.

2: A written statement from IT Environment (Australia) Pty Ltd as to the scope of work required on Lot 2 for the completion of the remediation notice given to Mobil Australia Pty Ltd and an estimated time line.

3: A written statement from IT Environment (Australia) Pty Ltd as to the companies site security policies.

4: A written statement from IT Environment (Australia) Pty Ltd accepting the responsibility for the significant financial loss suffered by Giles and Pitts Pty Ltd as a direct result of the works carried out on Lot 2 (also known as 120 Sugar Road, Maroochydore)

5: A written statement from IT Environment (Australia) Pty Ltd accepting the responsibility for the damage to secure fence line at the rear of the property 120 Sugar Road Maroochydore.

Page 2

Date: 10th December, 2004

6: A cheque for the amount of [redacted] made out to Giles and Pitts Pty Ltd as per original letter of demand dated 10th August, 2004.

7: A bond for the amount of [redacted] to be lodged with the solicitors Watson and Quinn for Giles and Pitts Pty Ltd. This bond to be maintained and all expenses paid for by IT Environment (Australia) Pty Ltd. The interpretation of all rulings to be made by Watson and Quinn Lawyers.

8: A cheque for the amount of [redacted] to cover costs incurred by Giles and Pitts Pty Ltd for legal advise and administration. This cheque to be made out to Giles and Pitts Pty Ltd.

It is unfortunate that Giles and Pitts Pty Ltd has been forced to ask for these minor concessions from IT Environment (Australia) Pty Ltd, but in light of past practices, from external contractors, the company Giles and Pitts Pty Ltd has been obligated to review future standards of operation in regards to external contractors access to sites leased and owned by Giles and Pitts Pty Ltd.

We thank you for the responsible attitude you have adopted to this matter and look forward working amicably with you to resolve any further issues that may arise.

Kind regards

[redacted]
sch4p4(6) Personal information

Guyton Giles
Operations Manager Giles and Pitts Pty Ltd.

MINISTERIAL CORRESPONDENCE

Phone: (07) 3227 8871

Fax: (07) 3227 7148



Queensland Government

Environmental Protection Agency
Queensland Parks and Wildlife Service

Ministerial Correspondence Fax Cover Sheet

DATE:

24 Feb 2005

TIME:

9:30am

TO:

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Director, Environment, Southern Region
 Director, QPWS, Southern Region
 Director, Environment, Central Region
 Director, QPWS, Central Region
 Director, Environment, Northern Region
 Director, QPWS, Northern Region
 Executive Director, Wet Tropics Management Authority

FROM:

Jacqui Tranter

TELEPHONE:

(07) 3227 8871

SUBJECT:

Ministerial BNE2005/2742

File: Bne 8343-6

NO. OF PAGES SENT:
(INCLUDING COVER PAGE)

(4) 5

URGENT () CONFIDENTIAL ()

IF THERE ARE ANY PROBLEMS RECEIVING THIS FACSIMILE MESSAGE, PLEASE
 CONTACT THIS OFFICE IMMEDIATELY

☐

For info & any necessary action

Please provide the following information by the Due Date shown.

☐

draft reply from Minister

☒

draft reply from Senior Policy Advisor

☐

other -

To

GREG O'BRIEN

Fax no.

3227 7677

FAX

sch4p4(6) Personal information

DUE DATE: 9 March 2005

Please email your response to:

min.corr@epa.qld.gov.au

Document name should be corresp. no. shown above (eg BNE2003 xxxxx.doc)

11 17/2005 14:38

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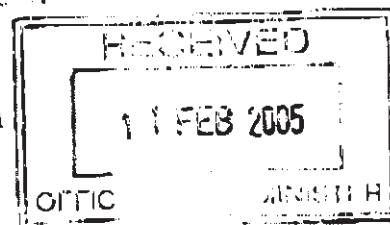
MIDAS CAR CARE

BNE 8343-6 PAGE 01

BNE2005/2742

11-2-2005

To: The Honorable Desley Boyle
Minister for Environment, Local Government, Planning and Women
P.O. Box 15031, City East
Qld 4002



From: Guyton Giles
Operations manager for Suncoast Car Care Pty Ltd T/A Midas Maroochydore
120 Sugar Road, Maroochydore
Qld 4558

Dear Ms Desley Boyle

I am writing to you in regards to a severe problem that has arisen due to land contamination and neglect for the environment. In the year 2001 while Mobil Australia Pty Ltd occupied a petrol station adjacent to our leased property, a major underground fuel spill contaminated groundwater and soil. The amount of fuel that was lost is extensive and caused considerable environmental damage.

On the 18th, January 2001 Mobil Australia entered into an access agreement with the tenants of 120 Sugar Road Maroochydore Qld. This access agreement was designed to outline Mobil Australia's commitment to not only environmental concerns but also to protect property owners and tenants affected by soil and groundwater contamination. The access agreement was only forwarded to Giles and Pitts Pty Ltd after the contamination had spread beyond the geographical boundaries of the service station and affected the land leased by Giles and Pitts Pty Ltd. As a result of this extensive contamination a remediation notice was issued to Mobil Australia Pty Ltd on 24th October 2003 by the Environmental Protection Agency. This remediation notice was given to Mobil Australia Pty Ltd to rectify the contamination as per ENVIRONMENTAL PROTECTION ACT 1994 (EP ACT) UNDERGROUND FUEL SPILL, EXECUTION OF SECTION 391 REMEDIATION NOTICE.

Since the date work has commenced on the site (120 Sugar Road, Maroochydore) occupants have experienced continuing problems. Giles and Pitts Pty Ltd has concerns with the delays involved with facilitating a speedy resolve to complaints arising from the underground fuel spill contaminating the area relating to Mobil's occupancy of the service station and its property owned by 4p4(6) Personal information and occupied by Giles and Pitts Pty Ltd.

OFFICE OF THE MINISTER	
REG No.	11/2005/14344
☒ Dept. to draft reply	
☐ Advisor to draft reply	
<hr/>	
☐ Briefing Note	
☐ Noted. File EPA / Office	
☐ Other	
<hr/>	
REPLY SIGNED BY:	4p4(6) Personal information
REPLY DUE BY:	

On the 23rd April, 2004 a revised access agreement was agreed to and signed by both agents for Giles and Pitts Pty Ltd and Mobil Australia Pty Ltd, the contractors for Mobil Australia "IT ENVIRONMENT (AUSTRALIA) Pty Ltd" then advised Giles and Pitts Pty Ltd as to the date of commencement of civil works required to uphold the remediation notice issued by the Environmental Protection Agency. These civil works required massive concession from Giles and Pitts Pty Ltd which were readily agreed to out of concern for the environment, the local communities health, the local estuarine system (a recent study rated the Maroochydore river system with a category D rating) and for property in the care of Giles and Pitts Pty Ltd. These concessions involved, noise pollution, denial of access to site, unsightliness (resulting in a huge decline in customer numbers, 50%), loss of available car parking facilities, damage to property and surrounds, damage to garden beds, damage to concrete driveway, dumping of unused stock, damage to security components required to uphold the obligations set in contractual agreements for insurance underwriters.

s.73 irrelevant information

The breach in the secure compound was sustained while civil works were being conducted on behalf of Mobil Australia Pty Ltd. As per phone conversation with representatives for IT Environment (Australia) Pty Ltd on 28th May, 2004. This can be confirmed and supporting evidence can be supplied. A formal letter was sent to IT Environment (Australia) Pty Ltd and Mobil Australia Pty Ltd on the 28th May, 2004 detailing the significant financial loss suffered by Giles and Pitts Pty Ltd as a direct result of unprofessional work and site security practices. After extended and resource debilitating communications Giles and Pitts Pty Ltd was forced to send a letter of demand to IT Environment (Australia) Pty Ltd on 10th August, 2004. Considerable time passed before a reply was formulated by IT Environment (Australia) Pty Ltd. This reply was "a gesture of goodwill", Giles and Pitts Pty Ltd has never asked for goodwill or gifts all Giles and Pitts Pty Ltd is seeking is reimbursement of the significant financial loss suffered as a direct result of civil works carried out on the site 120 Sugar Road, Maroochydore during the Mobil Australia Pty Ltd remediation process.

The access agreement signed by Mobil Australia Pty Ltd on the 14th January, 2001 clearly stipulates the obligations that Mobil Australia Pty Ltd must adhere to. As of this date 3rd January, 2005 Mobil Australia Pty Ltd has in no way shown that it will and I quote "indemnify, hold harmless and defend you from and against property damage or personal injury arising out of work performed under this agreement". There is no doubt, that as a direct result of unprofessional actions taken by Mobil Australia Pty Ltd and its contractors, a significant financial loss was suffered by Giles and Pitts Pty Ltd. This significant financial loss is for the amount of \$4(7)(1)(c) Business/commercial/professional/financial affairs (1%) of annual turnover generated by Giles and Pitts Pty Ltd but greatly reduces the amount of available resources for continued and sustained growth.

Giles and Pitts Pty Ltd began operating automotive retail stores in Australia in 1975 during the course of business Giles and Pitts Pty Ltd has strived to maintain and grow environmentally friendly solutions for automotive applications. These include maintaining vehicles to exacting standards to reduce pollution, introduction of extensive waste reduction and recycling policies and preventative systems to reduce impact of operations on the environmental surrounds. Giles and Pitts Pty Ltd commitment to clean and sustainable operations is at the forefront of environmental sustainability.

Mobil Australia Pty Ltd in its actions has shown that it holds disdain for local businesses and community groups. Massive concessions and resources have been allocated to the remediation process by small income, low resource companies. When confronted with a valid complaint Mobil Australia Pty Ltd hides behind and uses government bodies and its vast resource base to force small income, low resource companies to submit to their will. Unfortunately the resources required to sustain a lengthy legal battle are not available to many small business and community groups. Legal argument in a court of law is the only recourse available to small income, low resource groups with the system now in place.

Mediation facilities are available but they are only voluntary and rely on commitment from both parties. Giles and Pitts Pty Ltd has supplied all evidence and requested information on questioning by agents for Mobil Australia Pty Ltd and yet no commitment, implied or written from Mobil Australia Pty Ltd has been honored. This is a slap in the face by big business, for the government maintaining and building a healthy, prosperous and sustainable economy.

Open complaints registers, qualified forced mediation facilities and direct involvement by government bodies in contract stipulations and recourse facilities would greatly improve relations between larger more resourceful companies and small local business.

Giles and Pitts Pty Ltd maintains an unerring commitment to environmental concerns and puts the completion of the remediation above all else. The significant financial loss suffered by Giles and Pitts Pty Ltd is of little consequence but the extended delay and denial of written contractual agreements will greatly influence the approach small business groups take as a course of action when communicating with larger more resourceful organizations

Yours sincerely

sch4p4(6) Personal information

Guyton Giles

Sales Manager Giles and Pitts Pty Ltd

Date Prepared: 1 March 2005	Prepared by: Greg O'Brien
Approved by:	Title: Chief Scientific Advisor
Position: Director, Environment - Southern Region (EPA)	Division/Region: Integrated Assessment Branch - Environmental Operations
Date Approved:	Telephone: (07) 3224 4514
	Other Refs: BNE9848
	Track No: E/05/80644

Ref: BNE8343-6
BNE2005/2742
E/05/80644

Mr Guyton Giles
Suncoast Car Care Ltd T/A Midas Maroochydore
120 Sugar Road
MAROOCHYDORE QLD 4558

Dear Mr Giles

The Minister has received further advice following receipt of your letter of 11 February 2005 concerning the remediation of contamination originating from the Mobil Service Station located at 116 - 118 Sugar Road, Maroochydore and has asked me to respond on her behalf.

Mobil Australia Pty Ltd (Mobil) conducted a number of contaminated land investigations between December 2000 and July 2002 to determine the extent of petroleum hydrocarbon contaminants from a leaking fuel tank at the service station site into adjacent land. The Environmental Protection Agency (EPA) evaluated the associated reports and, in order to protect the environment from the risks posed by the hydrocarbon contamination, issued a Remediation Notice ('the Notice') on 24 October 2002 in accordance with s.391 of the *Environmental Protection Act 1994* (the EPAct).

The Notice requires that a suitably qualified and experienced contaminated land consultant supervise the remediation works and that environmental protection measures be implemented to manage environmental harm, including nuisance such as odour, dust and noise during the implementation of such works. Mobil engaged the environmental consultants IT Environmental (Australia) Pty Ltd (IT) to undertake the necessary works.

As you may be aware, inground monitoring wells have been installed and interlinked in the affected area including those on the property at 120 Sugar Road of which your associated company Giles and Pitts Pty Ltd is the lessee. The wells are connected to a groundwater and soil vapour extraction plant to draw leaked petroleum hydrocarbon from soil and groundwater for treatment and disposal. Further work will be conducted to intercept and collect contamination on the site of origin and ongoing work is required to monitor the progress of remediation and the extent of the spread of contamination.

s.73 irrelevant information

s.73 irrelevant information

The EPA is also aware that the majority of works, conducted on the property of which your company is the lessee, have been undertaken out of business hours. At the present time the amount of

work needed on your site is minor involving groundwater sampling and well adjustments to ensure the efficient operation of the remediation equipment.

In EPA correspondence to you of 18 June 2004 and 15 February 2005, it was advised that the "matters in dispute be separated from the necessity to undertake the cleanup works". It was also advised that, in order to ensure the abatement of environmental risks from the spread of contamination, any interruption of legitimate access to address the requirements of the Notice would not be acceptable. Your company's on going support for this position is appreciated.

The comments you have made on changes to strengthen voluntary mediation and court actions relating to disputes are noted. However, s.394 of the EP Act provides the necessary process to ensure that, in the event that there is failure to reach agreement with the parties involved, an appropriate court would decide any financial loss incurred because of work conducted by Mobil or their contractors.

The Minister thanks you for bringing this matter to her attention and trusts this information clarifies the situation. Should you have any further enquiries, please contact Mr Greg O'Brien of the EPA on telephone (07) 3224 4514.

Yours sincerely

Ross MacLeod
Senior Policy Advisor
(Environment)

Nick Heath
Policy Advisor
(Environment)

Marcus Toyne
Assistant Policy Advisor
(Environment)



Notice For Remediation of Contaminated Land

Section 391 Environmental Protection Act 1994

This statutory notice is issued by the administering authority pursuant to section 391 of the Environmental Protection Act 1994, to advise you of a decision or action.

Enquiries to : Greg O'Brien
Telephone : (07) 3224 4514
Your reference :
Our reference : BNE9848

Mobil Oil Australia Pty Ltd
417 Saint Kilda Road
MELBOURNE VIC 3004

Attention: The Company Secretary

Cc: Mr John Knaggs
Chief Executive Officer
Maroochy Shire Council
P.O. Box 76
NAMBOUR QLD 4560

Cc: Owner of Lot 1 RP176929
Balaring Pty Ltd
PO Box 1699
SUNSHINE PLAZA QLD 4558
Attention: Mr Dennis Ryan

Cc: Owner of Lot 2 on RP176929
sch4p4(6) Personal information
PO Box 879
BUDDINA QLD 4575

Dear Sir/Madam

Re: Remediation of Contaminated Land described as Lot 1 and Lot 2 on RP176929, located 116 – 118 and 120 Sugar Road, Maroochydhore, and listed on the Contaminated Land Register (CLR), as notified by Notice of Decision, pursuant to section 384 of the *Environmental Protection Act 1994*, dated 8 October 2002

In relation to the above land, the Environmental Protection Agency (EPA) has reviewed the report(s) titled

- Environmental Site Assessment, Mobil Service Station, 120 Sugar Road Maroochydhore Qld, prepared by Handex Australia Pty Ltd, dated 2 February 2001;
- Additional Well Installation, Former Mobil Service Station, 120 Sugar Road Maroochydhore Qld, prepared by Handex Australia Pty Ltd, dated 20 December 2001;
- Multi-Phase Extraction Program Summary Report, Former Mobil Service Station, 120 Sugar Road Maroochydhore Qld, prepared by Handex Australia Pty Ltd, dated 13 February 2002; and

- Additional Well Installation, Former Mobil Service Station, 120 Sugar Road Maroochydore Qld, prepared by Handex Australia Pty Ltd, dated 19 July 2002.

and has noted the presence of petroleum hydrocarbon contamination and made the following decision:

This Remediation Notice replaces the Remediation Notice issued on 24 October 2002.

In accordance with section 391(1) of the *Environmental Protection Act 1994 (EPAct)*, the recipient of this Notice must conduct or commission work to remediate the contaminated land described as Lot 1 on RP176929, located 116 – 118 Sugar Road, Maroochydore (the subject land) and Lot 2 on RP176929, located at 120 Sugar Road, Maroochydore and any other land that has been determined to be impacted by contamination originating from the subject site.

Pursuant to section 391(5)(b) of the *EPAct*, the recipient of this Notice has been identified as Mobil Oil Australia Pty Ltd.

Work to be conducted or commissioned by recipient

In accordance with section 391(5)(c) of the *EPAct*, the recipient of this Notice (“the recipient”) must conduct or commission the following items.

A. Remediation Action Plan (RAP)

Prior to the commencement of remediation works the recipient must have a RAP certified according to Section A4 that details the works to be undertaken for the remediation of soil and groundwater for the above referenced land and related impacted land. The RAP must include, but not be limited to, the following components and requirements.

1. General requirements.

The RAP must be developed by a person acceptable to the EPA and whose qualifications and experience must comply with sections 381 and 395 of the *EPAct*.

The RAP must provide for the implementation of remediation works (the ‘remediation program’). The remediation program must include works to ensure that *serious environmental harm to a person, animal or another part of the environment is prevented* on the subject land, the adjacent land described as Lot 2 on RP176929 and any other land that has been impacted by contamination originating from the subject land, and in the associated groundwater.

A remediation program that relies on solely monitored natural attenuation (MNA) to abate phase-separated hydrocarbons (PSH) both on the above referenced land and off that land is insufficient to address the outcomes required by this Notice.

The remediation program must include environmental protection measures to ensure that environmental harm is not caused during remediation works. Such measures must include, but not be limited to, the management of dust, noise, stormwater runoff, sediment and erosion, spillage from any

equipment used and odour releases resulting from the handling and/or movement of contaminated soil and water including groundwater.

The recipient must include written evidence in the RAP of advice provided to the Local Authority and other relevant service providers (eg Telstra) of the contamination status of the site, the known and probable extent of contamination and the risks associated with penetration of in-ground services by petroleum hydrocarbon contamination.

2. *Extent of contamination.*

The RAP must include a program of investigations to fully delineate the lateral and vertical extent of the petroleum hydrocarbon contamination in both groundwater and soil and ensure that the source of any hydrocarbon contamination is identified and fully rectified.

If these investigations indicate that land other than the subject site and Lot 2 on RP176929 has been impacted by contamination originating from the subject site, written notification must be provided to the EPA immediately.

3. *Remediation outcomes.*

The works detailed in the remediation program must be sufficient to enable the EPA to remove the subject site from the CLR and Lot 2 on RP176929 from the CLR and the Environmental Management Register (EMR).

The works detailed in the remediation program must also be sufficient to remediate any other land that has been impacted by contamination originating from the subject site to a level where serious environmental harm to a person, animal or another part of the environment is prevented and the land does not require listing on the EMR/CLR.

4. *Work quality, certification by Third Party Reviewer.*

All remediation works must be conducted according to the Queensland Government's draft *Guidelines for the Assessment and Management of Contaminated Land in Queensland, May 1998* and the *National Environment Protection (Assessment of Site Contamination) Measure, December 1999*.

The RAP and its implementation must be reviewed and certified by a person who is a member of a prescribed organization and who has qualifications and experience relevant to site contamination issues. The person must also be accepted under the EPA's current Terms of Reference (TOR) for a Third Party Reviewer (TPR) or be an environmental auditor (contaminated land) accredited in either New South Wales or Victorian Government jurisdictions and be eligible for appointment as TPR. The role of the TPR is to review the RAP and remediation works to ensure that the abatement of the risk of serious environmental harm does occur and that the standard of works performed attains the work quality outlined in the above environmental guidelines and meets the requirements of this Notice.

A Statutory Declaration made under the *Oaths Act 1867* must be submitted to the EPA by (a) the preparer of the RAP and (b) the TPR in relation to the acceptability of the RAP, together with a copy of the RAP, prior to its implementation.

B. Implementation of the RAP

1. *Timeframe for implementation*

The recipient must commence the implementation of the RAP within 7 days of approval of the RAP by the TPR and proceed expeditiously to achieve completion in a reasonable timeframe but in any case, by no later than by 31 December 2006.

2. *Progress reporting*

The recipient must provide written monthly progress reports on the progress of remediation works to the EPA from the date of commencement of such works.

3. *Suitable persons*

All remediation and validation works must be supervised by a person acceptable to the EPA and whose qualifications and experience must comply with sections 381 and 395 of the *EPAct*.

4. *Approval to remove and treat or dispose of contaminated soil*

Pursuant to section 391(5)(d) of the *EPAct*, the EPA approves of the removal and treatment or disposal of soil from Lot 1 on RP735012, and any adjacent land affected by contamination, as required to achieve the stated outcomes of the remediation program subject to the application processes required under Section 424 of the *EPAct* and certification by the TPR.

C. Validation of Remediation Works

1. *Submission of Validation Report*

Within 30 days of the completion of implementation of the RAP, the recipient, or an agent acting on behalf of the recipient, must submit a Validation Report to the EPA.

The Validation Report must include, but not be limited to, the following components.

- (a) The requirements of section 395 of the *EPAct* and the above environmental guidelines must be satisfied.
- (b) The monitoring results outlined in section A3 of this Notice that demonstrate that all PSH has been removed both on site and off-site and any related information must be included.

2. *Certification*

The Validation Report must be accompanied by certification by the TPR in accordance with the TOR discussed in Section 4 - *Work quality, certification by Third Party Reviewer* above.

D. Submission of a Draft Site Management Plan

The Validation Report must be accompanied by a draft Site Management Plan (SMP) for approval by the EPA. The SMP must detail a strategy for the ongoing management of Lot 1 on RP176929. This lot

will remain listed on the EMR while the notifiable activity continues following implementation and validation of the RAP.

The strategy detailed in the SMP must include provisions for the continued protection of human health and the environment and the implementation of a soil and groundwater monitoring and reporting program while the notifiable activity continues.

Review or appeal details

The recipient of this Notice and the owners of the above referenced land parcels may apply to the administering authority for a review of this decision within 14 days after receiving this notice. These parties may also appeal against this decision to the Planning and Environment Court.

Information outlining the review and appeal processes under the *Environmental Protection Act 1994* is included with this Notice. This information is intended as a guide only. You may have other legal rights and obligations.

.....
Signed

.....
Date

Greg O'Brien
Chief Scientific Advisor (Environmental Operations)
Delegate of Administering Authority
Environmental Protection Act 1994

Extracts from the Act Regarding Reviews and Appeals

Procedure for review

521.

- (1) A dissatisfied person may apply for a review of an original decision.
- (2) The application must-
 - (a) be made in the approved form to the administering authority within-
 - (i) 14 days after the day on which the person receives notice of the original decision or the administering authority is taken to have made the decision (the "review date"); or
 - (ii) the longer period the authority in special circumstances allows not later than the review date; and
 - (b) be supported by enough information to enable the authority to decide the application.
- (3) On or before making the application, the applicant must send the following documents to the other persons who were given notice of the original decision-
 - (a) notice of the application (the "review notice");
 - (b) a copy of the application and supporting documents.
- (4) The review notice must inform the recipient that submission on the application may be made to the administering authority within 7 days after the application is made to the authority.
- (5) If the administering authority is satisfied the applicant has complied with subsection (2) and (3), the authority must, within 14 days after receiving the application-
 - (a) review the original decision;
 - (b) consider any submissions properly made by a recipient of the review notice; and
 - (c) make a decision (the "review decision") to-
 - (i) confirm or revoke the original decision; or
 - (ii) vary the original decision in a way the administering authority considers appropriate.
- (6) The application does not stay the original decision.
- (7) The application must not be dealt with by-
 - (a) the person who made the original decision; or
 - (b) a person in a less senior office than the person who made the original decision.
- (8) Within 14 days after making the decision, the administering authority must give written notice of the decision to the applicant and persons who were given notice of the original decision.
- (9) The notice must-
 - (a) include the reasons for the review decision; and
 - (b) inform the person of their right of appeal against the decision.
- (10) If the administering authority does not comply with subsections (5) or (8), the authority is taken to have made a decision confirming the original decision.
- (11) Subsection (7) applies despite section *Acts Interpretation Act 1954*, section 27A.
- (12) This section does not apply to an original decision made by-
 - (a) for a matter, the administration and enforcement of which has been devolved to a local government, the local government itself or the chief executive officer of the local government personally; or
 - (b) for another matter-the chief executive personally.

Stay of operation of original decisions

522.

- (1) If an application is made for review of an original decision, the applicant may immediately apply for a stay of the decision to-
 - (a) for an original decision mentioned in schedule 1, part 1 - the tribunal; or
 - (b) for an original decision mentioned in schedule 1, part 2 - the Court.
- (2) The tribunal or Court may stay the decision to secure the effectiveness of the review and any later appeal to the tribunal or Court.
- (3) A stay may be given on conditions the tribunal or Court considers appropriate and has effect for the period stated by the tribunal or Court.
- (4) The period of a stay must not extend past the time when the administering authority reviews the decision and any later period the tribunal or Court allows the applicant to appeal against the review decision.

Who may appeal

531.

- (1) A dissatisfied person who is dissatisfied with a review decision, other than a review decision to which subdivision 1 applies, may appeal against the decision to the Court.
- (2) The chief executive may appeal against another administering authority's decision (whether an original or review decision) to the Court.
- (3) A dissatisfied person who is dissatisfied with an original decision to which section 521 does not apply may appeal against the decision to the Court.

Fax



Queensland Government

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

To: Mr Guyton Giles, Midas, Sugar **Fax:** 0754432046
Road Maroochydore

From: Greg O'Brien

Telephone: 32244514 **Fax:** (07)32277677

E-mail: greg.obrien@epa.qld.gov.au

Date: 15/2/05 **Pages:** 4 (including this page)

Subject: Remediation Notice Mobil Maroochydore, denial of access

☐ **URGENT**

☐ **CONFIDENTIAL**

Privacy and confidentiality notice

The information contained in this facsimile is intended for the named recipient/s only. It may contain privileged and confidential information and if you are not an intended recipient, you must not copy, distribute or take any action in reliance on it. If you have received this facsimile in error, please notify the sender.

RTI DL RELEASE - EHP



Enquiries Greg O'Brien
Telephone (07) 32244514
Your reference
Our reference BNE9848

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

15 February 2005

Mr Guyton Giles
Suncoast Car Care Pty Ltd (Midas)
120 Sugar Road
Maroochydore Q 4558

Dear Mr Giles

REMEDIATION FORMER MOBIL SITE 118 SUGAR ROAD MAROOCHYDORE

I refer to your correspondence received 11 February 2005 and to telephone discussions with yourself regarding the above issue.

As you are aware an underground fuel leak occurred from an in-ground fuel storage tank during Mobil's occupancy of the above site. The fuel spread onto adjacent properties and caused contamination of soil and groundwater. Consequently, the Environmental Protection Agency (EPA) issued a Remediation Notice ("the Notice") to Mobil under Section 391 of the Environmental Protection Act 1994 (EP Act) and listed adjacent properties, including the premises your company leases from the owner, on the contaminated land and environmental management registers.

The Notice requires that Mobil undertake works to remediate the contamination to abate health and environmental risks from the contamination and to restore impacted land to its former state and enable its deregistration. The remediation works include the use of relevant technologies involving installation of groundwater wells and interconnecting pipework on the affected properties and deployment of soil vapour and groundwater extraction plant to remove and treat the contamination. This work means that the property, of which you are a lessee, must be entered from time to time to comply with requirements of the Notice.

At the present time these works mainly relate to adjustment of groundwater wellheads and monitoring of groundwater contamination to determine the progress of remediation. This involves relatively minor activities on your site, most of which can be conducted out of working hours so as to have minimal interference with your business activities.

s.73 irrelevant information

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The EPA notes that you have a written agreement about site access with Mobil. The EPA also notes that you have formerly denied access to Mobil and their contractors to conduct remediation works required under the Notice.

s.73 irrelevant information

s.73 irrelevant information It is suggested that you review section 394 of the EP Act (copy attached) that details the legal requirements to allow entry of the site you occupy by Mobil as the recipient of the Notice and their contractors.

The EPA's interests relate to the lawful execution of the Notice to ensure protection of the environment. The EPA will not countenance a situation where site access to comply with the Notice is unlawfully denied thereby impeding its execution. The EPA will be obliged to take action under the EP Act in the event that there is any further delay in works to remediate the contaminated area.

Yours sincerely

sch4p4(6) Personal information

Greg O'Brien
Chief Scientific Advisor Project Support

to remediate contaminated land within the time it is required to make a decision on the application, the failure is taken to be a decision by the authority to refuse the application at the end of the time.

394 Procedure to be followed if recipient is not owner

- (1) This section applies if the recipient of a notice to conduct or commission work to remediate contaminated land is not the land's owner.
- (2) The recipient, or person conducting the work for the recipient (the *contractor*), may enter the land to conduct the work only—
 - (a) with the consent of the owner and occupier of the land; or
 - (b) if the recipient or contractor has given at least 5 business days written notice to the owner and occupier.
- (3) The notice must inform the owner and occupier of—
 - (a) the intention to enter the land; and
 - (b) the purpose of the entry; and
 - (c) the days and times when the entry is to be made.
- (4) In conducting the work, the recipient or contractor must take all reasonable steps to ensure the recipient or contractor causes as little inconvenience, and does as little damage, as is practicable in the circumstances.
- (5) Nothing in this section authorises the recipient or contractor to enter a structure, or part of a structure, used for residential purposes.
- (6) If a person incurs loss or damage because of the work conducted by the recipient or contractor, the person is entitled to be paid by the recipient or contractor the reasonable compensation because of the loss or damage that is agreed between the recipient or contractor and the person, or failing agreement, decided by a court having jurisdiction for the recovery of amounts up to the amount of compensation claimed.
- (7) The court may make the order about costs it considers just.

0754432046

11.02.2005

To: Mr Greg O'Brien
Chief Scientific Advisor Project Support
P.O Box 155 Brisbane Albert Street
Queensland, 4002

From: Guyton Giles
Operations manager for Suncoast Car Care Pty Ltd T/A Midas Maroochydore
120 Sugar Road, Maroochydore
Qld 4558

Dear Mr Greg O'Brien

I am writing to you in regards to a severe problem that has arisen due to land contamination and neglect for the environment. In the year 2001 while Mobil Australia Pty Ltd occupied a petrol station adjacent to our leased property, a major underground fuel spill contaminated groundwater and soil. The amount of fuel that was lost is extensive and caused considerable environmental damage.

On the 18th, January 2001 Mobil Australia entered into an access agreement with the tenants of 120 Sugar Road Maroochydore Qld. This access agreement was designed to outline Mobil Australia's commitment to not only environmental concerns but also to protect property owners and tenants affected by soil and groundwater contamination. The access agreement was only forwarded to Giles and Pitts Pty Ltd after the contamination had spread beyond the geographical boundaries of the service station and affected the land leased by Giles and Pitts Pty Ltd. As a result of this extensive contamination a remediation notice was issued to Mobil Australia Pty Ltd on 24th October 2003 by the Environmental Protection Agency. This remediation notice was given to Mobil Australia Pty Ltd to rectify the contamination as per ENVIRONMENTAL PROTECTION ACT 19.94 (EP ACT) UNDERGROUND FUEL SPILL, EXECUTION OF SECTION 391 REMEDIATION NOTICE.

Since the date work has commenced on the site (120 Sugar Road, Maroochydore) occupants have experienced continuing problems. Giles and Pitts Pty Ltd has concerns with the delays involved with facilitating a speedy resolve to complaints arising from the underground fuel spill contaminating the area relating to Mobil's occupancy of the service station and its (b) Personal property owned by 4p4(6) Personal information and occupied by Giles and Pitts Pty Ltd.

0754432046

On the 23rd April, 2004 a revised access agreement was agreed to and signed by both agents for Giles and Pitts Pty Ltd and Mobil Australia Pty Ltd, the contractors for Mobil Australia "IT ENVIRONMENT (AUSTRALIA) Pty Ltd" then advised Giles and Pitts Pty Ltd as to the date of commencement of civil works required to uphold the remediation notice issued by the Environmental Protection Agency. These civil works required massive concession from Giles and Pitts Pty Ltd which were readily agreed to out of concern for the environment, the local communities health, the local estuarine system (a recent study rated the Maroochydore river system with a category D rating) and for property in the care of Giles and Pitts Pty Ltd. These concessions involved, noise pollution, denial of access to site, unsightliness (resulting in a huge decline in customer numbers, 50%), loss of available car parking facilities, damage to property and surrounds, damage to garden beds, damage to concrete driveway, dumping of unused stock, damage to security components required to uphold the obligations set in contractual agreements for insurance underwriters.

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The breach in the secure compound was sustained while civil works were being conducted on behalf of Mobil Australia Pty Ltd. As per phone conversation with representatives for IT Environment (Australia) Pty Ltd on 28th May, 2004. This can be confirmed and supporting evidence can be supplied. A formal letter was sent to IT Environment (Australia) Pty Ltd and Mobil Australia Pty Ltd on the 28th May, 2004 detailing the significant financial loss suffered by Giles and Pitts Pty Ltd as a direct result of unprofessional work and site security practices. After extended and resource debilitating communications Giles and Pitts Pty Ltd was forced to send a letter of demand to IT Environment (Australia) Pty Ltd on 10th August, 2004. Considerable time passed before a reply was formulated by IT Environment (Australia) Pty Ltd. This reply was "a gesture of goodwill", Giles and Pitts Pty Ltd has never asked for goodwill or gifts all Giles and Pitts Pty Ltd is seeking is reimbursement of the significant financial loss suffered as a direct result of civil works carried out on the site 120 Sugar Road, Maroochydore during the Mobil Australia Pty Ltd remediation process.

0754432046

The access agreement signed by Mobil Australia Pty Ltd on the 18th January, 2001 clearly stipulates the obligations that Mobil Australia Pty Ltd must adhere to. As of this date 3rd January, 2005 Mobil Australia Pty Ltd has in no way shown that it will and I quote "indemnify, hold harmless and defend you from and against property damage or personal injury arising out of work performed under this agreement". There is no doubt, that as a direct result of unprofessional actions taken by Mobil Australia Pty Ltd and its contractors, a significant financial loss was suffered by Giles and Pitts Pty Ltd. This significant financial loss is for the amount of

b4(7)(1)(c) Business/commercial/professional/financial affairs
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This figure relates to approximately one percent (1%) of annual turnover generated by Giles and Pitts Pty Ltd but greatly reduces the amount of available resources for continued and sustained growth.

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Mediation facilities are available but they are only voluntary and rely on commitment from both parties. Giles and Pitts Pty Ltd has supplied all evidence and requested information on questioning by agents for Mobil Australia Pty Ltd and yet no commitment, implied or written from Mobil Australia Pty Ltd has been honored. This is a slap in the face by big business, for the government maintaining and building a healthy, prosperous and sustainable economy.

0754432046

Open complaints registers, qualified forced mediation facilities and direct involvement by government bodies in contract stipulations and recourse facilities would greatly improve relations between larger more resourceful companies and small local business.

Giles and Pitts Pty Ltd maintains an unerring commitment to environmental concerns and puts the completion of the remediation above all else. The significant financial loss suffered by Giles and Pitts Pty Ltd is of little consequence but the extended delay and denial of written contractual agreements will greatly influence the approach small business groups take as a course of action when communicating with larger more resourceful organizations

Yours sincerely

sch4p4(6) Personal information

Guyton Giles

Sales Manager Giles and Pitts Pty Ltd

Mobil Neumann Sugars Road Alexandra Headland

1&2 RP176929

BNE9848

\\EO_Integrated Assessment\Project Support\Manager GOC\Contaminated Land\Mobil Sugar Road Maroochydore

TPR Mack Dreyer

10 October 2012

Site History

The site has been a service station for 30 years, prior to which it was a car sales yard. A substantial fuel leak occurred at the site some time ago.

Topography

The site slopes gently to the south east to south.

Geology

The site is underlain by Quaternary estuarine and swamp deposits. Soils on the site are a mix of clay, sand and gravels, with some varied fills in parts providing preferential pathways.

Hydrogeology

Local perched aquifer which generally follows surface contours with the overall direction to a swamp in the west south west.

Investigations

Significant investigations have been conducted at the site with PSH found in 2001. Up to 37cm was found in MW13 and PSH had left the site. An MPE trial was conducted in Aug 2001. The site was listed on the CLR in Oct 2002 and a remediation notice issued to Mobil (the polluter). There was a requirement for a TPR.

An MPE system has been operated on the site by Otek for some time. A surfactant flush event was conducted in mid-2012 to speed up recovery.

Substantial product has been recovered (over 5t) with reasonable quantities continuing to be recovered on a daily basis. The attached graph shows recoveries and the figure shows the most recent available benzene results.

Current Status

The remediation has taken longer than originally anticipated, although it is reasonable to conclude that the risk has been substantially reduced.

A meeting was held on-site 30 May 2012 and the following timeframes were agreed with Mobil:

1. *Surfactant injection 30/5/12*
2. *Supply TPR with revised surfactant injection plan - 8/6/2012*
3. *MPE system operation for 3 months from early June 2012*
4. *Risk assessment to TPR by 8/6/2012*
5. *Stegbar validation report - mid Aug 2012*

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11. *3rd GME - June 2013*

- *Otek are to dip wells for the presence of PSH during the remediation works. If you would please advise me (& the TPR) if any PSH is encountered.*
- *Mobil was to respond with its plans for the adjacent former Midas site within 2 weeks.*

To date items 1-6 are on track. The Stegbar validation report was provided to the TPR in late August and is expected to be finalised shortly. There has been no reported PSH. Mobil also advised that the adjacent former Midas site validation report would be provided at the end of remedial activities on the Neumann site.

Action Required

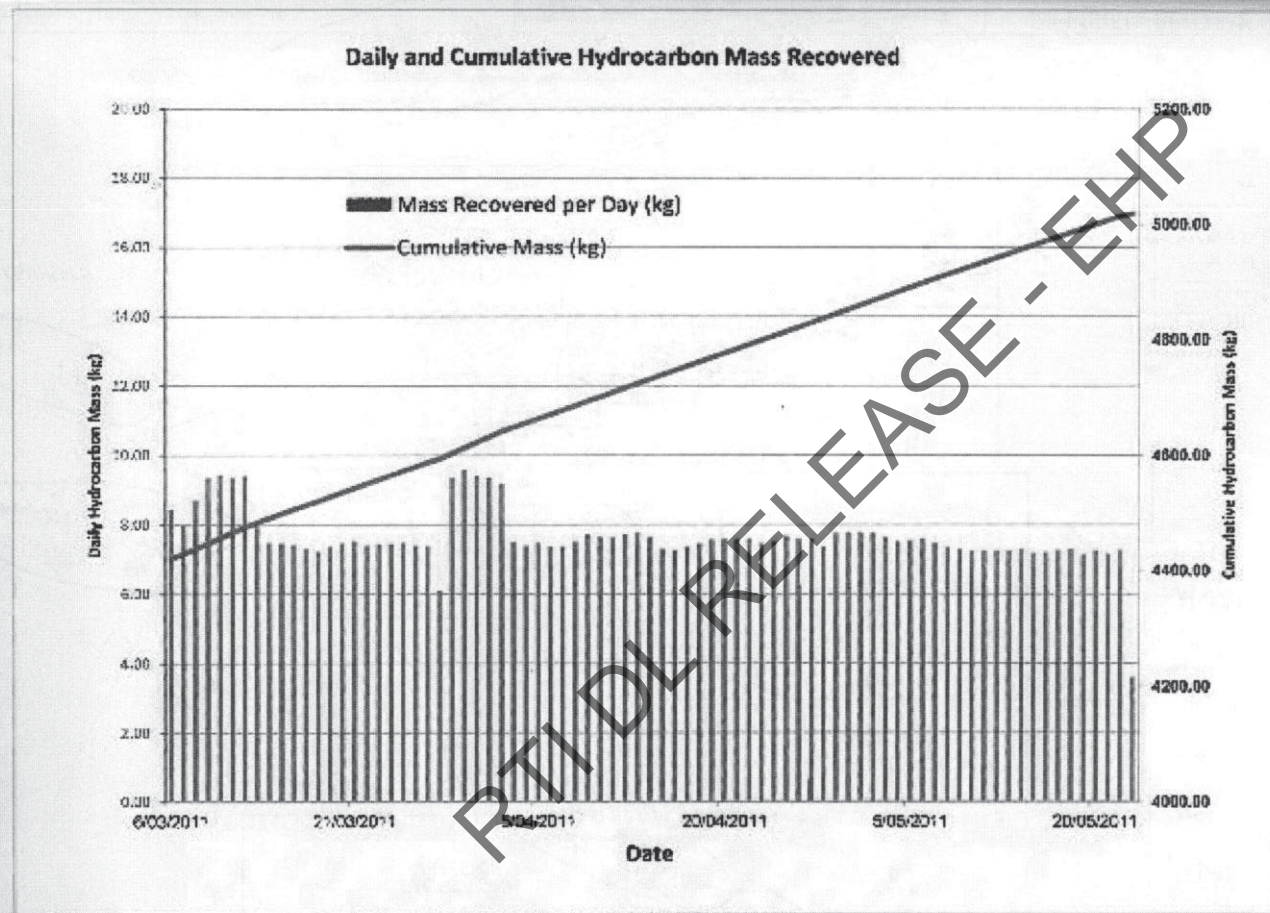
Follow ups with Luis Cifuentes of Mobil on the progress of the above list.

The ultimate aim is to have the site removed from the CLR (but stay on the EMR as it is an operating service station) and have the affected neighbouring properties removed from the EMR (Stegbars) or, if suitable to the owner, left on the EMR with an SMP.

Contacts

Mack Dreyer 3711-5088

Luis Cifuentes, Mobil, Project Manager luis.cifuentes@exxonmobil.com



COMMERCIAL IN CONFIDENCE

O'Connor Gary

From: O'Connor Gary
Sent: 19 June 2012 4:15 PM
To: 'Cifuentes, Luis /C'
Subject: RE: Mobil Sugar Road Maroochydore
Thanks Luis

All is in order.

Regards

Gary O'Connor
Manager, Project Support, Statewide Environmental Assessment
Environmental Performance and Coordination Branch
Environmental Services and Regulation Division
Department of Environment and Heritage Protection

Telephone: 67 7 3330 5708
Facsimile: 61 7 3330 5754
Mobile: (6) Personal information

GPO Box 2454 Brisbane QLD 4001
400 George Street Brisbane

From: Cifuentes, Luis /C [mailto:luis.cifuentes@exxonmobil.com]
Sent: 18 June 2012 9:16 AM
To: O'Connor Gary; mack@birchwoodenviro.com.au
Subject: RE: Mobil Sugar Road Maroochydore

Hi Gary,

Apologies for the delay getting back to you with this one. I confirm that the HRA report was sent a couple of weeks ago to Mack, according to OTEK.

Mack, anyway please let me know if this is correct.

Kind Regards,

Luis Eduardo Cifuentes
CTC Program Manager
ExxonMobil Environmental Services - Mobil Oil Australia Pty Ltd
12 Riverside Quay, Southbank, VIC 3006.
Phone: +61 3 9622 7824 / Mobile: (6) Personal information

From: O'Connor Gary [mailto:Gary.O'Connor@derm.qld.gov.au]
Sent: Friday, 15 June 2012 11:39 AM
To: Cifuentes, Luis /C; mack@birchwoodenviro.com.au
Subject: RE: Mobil Sugar Road Maroochydore

Thanks Luis for the information.

I have also been advised by the TPR that the Surfactant Injection Event Plan has been received and reviewed. A copy has been forwarded to EHP for our records. Thanks.

The one outstanding item on my list is the Risk Assessment, which was to be provided to the TPR, due date 8/6/12. Could you please advise if this has occurred.

Regards

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From: Cifuentes, Luis /C [<mailto:luis.cifuentes@exxonmobil.com>]
Sent: 8 June 2012 8:21 AM
To: O'Connor Gary; mack@birchwoodenviro.com.au
Subject: FW: Mobil Sugar Road Maroochydhore

Hi Gary,

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Any question, please let me know.

Kind Regards,

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Hi Luis – Please see the response from Brendan. As I recall this was discussed with the Midas lawyer earlier this year so they should be aware of the timing.

Regards - Andrew

Andrew Hunt
 Kleinfelder
 Mobile: 0414 614 614 (6) Personal information

From: Brendan Ebzery [<mailto:BEbzery@otek.com.au>]
Sent: Thursday, June 07, 2012 4:21 PM
To: Andrew Hunt
Subject: RE: Mobil Sugar Road Maroochydhore

Andrew/Luis

The validation report for the Midas site will be undertaken once site remediation works are complete. The on-site results need to meet the SSTs for the Midas site to ensure no re-contamination of the Midas site. This report is not expected to be complete for at least 8 months. Thanks

Regards



Brendan Ebzery
National Remediation Manager
Senior Principal Remediation Scientist
 T +61 7 3426 5200 D +61 7 3426 5216 F +61 7 3426 5299
 A Level 1, 9/44 Station Road, Yeerongpilly QLD 4105
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Winner of the Australia-China Business Award 2011 - Austrade Business Promotion Award.



From: Andrew Hunt [<mailto:AHunt@kleinfelder.com>]
Sent: Wednesday, 6 June 2012 9:01 AM
To: Brendan Ebzery
Subject: RE: Mobil Sugar Road Maroochydore

Hi No 2 – Can you advise on the below. Thanks.

Regards - Andrew

Andrew Hunt
 Kleinfelder
 sch4(6) Personal information

From: Cifuentes, Luis /C [<mailto:luis.cifuentes@exxonmobil.com>]
Sent: Tuesday, June 05, 2012 3:54 PM
To: Andrew Hunt
Subject: RE: Mobil Sugar Road Maroochydore

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Kind Regards,

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 12 Riverside Quay, Southbank, VIC 3006.
 Phone: +61 3 9622 7824 / sch4(6) Personal information

From: O'Connor Gary [<mailto:Gary.O'Connor@derm.qld.gov.au>]
Sent: Wednesday, 30 May 2012 4:35 PM
To: Adam Breen; Cifuentes, Luis /C; Mack Dreyer; Brendan Ebzery; AHunt@kleinfelder.com
Cc: Marc Andrews
Subject: RE: Mobil Sugar Road Maroochydore

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Gary O'Connor
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 Environmental Performance and Coordination Branch

Telephone: 67 7 3330 5708
 Facsimile: 61 7 3330 5754
 Mobile: 04 66 66 66 66
 Email: g.oco@epc.doe.gov.au

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Andrew Hunt

Kleinfelder

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National Remediation Manager
Senior Principal Remediation Scientist

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Manager, Project Support

Environmental Performance and Coordination Branch

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Mobile: [redacted] (6) Personal information

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Senior Principal Remediation Scientist

T +61 7 3426 5200 D +61 7 3426 5216 F +61 7 3426 5299

A Level 1, 9/44 Station Road, Yeerongpilly QLD 4105

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In 2012 OTEK celebrates 20 years of providing innovative environmental, remediation and engineering excellence throughout the Australasian region.

From: Andrew Hunt [mailto:AHunt@kleinfelder.com]

Sent: Wednesday, 6 June 2012 9:01 AM

To: Brendan Ebzery

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Andrew Hunt

Kleinfelder

mlsch4p4(6) Personal information

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O'Connor Gary

From: Mack Dreyer [mack@birchwoodenviro.com.au]
Sent: 12 June 2012 11:31 AM
To: O'Connor Gary
Subject: FW: Surfactant Flush - Maroochydore
Attachments: Surfactant Injection Event Program (TPR) 7-6-12.pdf

Gary

Please find attached Otek's amended surfactant injection program as we requested during our site inspection on 30 May. Otek have not committed to a date for the second round of injection (although a MPE operation period of 3 months in between surfactant injection events has been identified in the document). This will be assessed pending the results of the monitoring post the first round of injection. ✓

As you know I am concerned with the potential "Swiss cheese" effect of this strategy as well as potential runaway (although runaway should be manageable if the site is being dipped on a fortnightly basis), but at this stage I suggest that we wait and assess the first round of monitoring results as well as the MPE system recovery results. ✓

I will request Otek provide us with a copy of the monitoring results as soon as they are available.

Please let me know if you have any concerns with this approach or have any additional requirements.

Regards

Mack

Mack Dreyer

Principal

P : (07) 3711 5088 sch4p4 (6) Personal information 3711 5348
 PO Box 2342 Sunnybank Hills 4109



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From: Adam Breen [mailto:ABreen@otek.com.au]
Sent: Friday, 8 June 2012 9:30 AM
To: Mack Dreyer (mack@birchwoodenviro.com.au)
Subject: FW: Surfactant Flush - Maroochydore

Mack, Please find information attached as requested.

Regards

Adam

From: Adam Breen
Sent: Friday, 13 April 2012 3:46 PM
To: 'Mack Dreyer'
Subject: RE: Surfactant Flush - Maroochydhore

Mack, the system will be recommissioned prior to works. It hasn't been turned on yet. There are drilling works that are being carried out next week. Unfortunately our project package doesn't include a GME works until later and has not been included in the contracts. The plan is for the site

Well Install
 Surfactant Flush
 System Operation (3 months)
 Surfactant Flush 2
 System Operation (3 months)
 GME 1
 Remediation System Removal
 GME 2
 GME 3
 Request Site Closure
 Decommission Wells

I can do some additional sampling of wells of interest next Wednesday during the Well install works. Most likely Monitor Wells MW-1, MW-25, MW-18, MW-2 and MW-13 to be sampled.

Hydraulic control will maintained by extracting well that have been injected under a push / pull methodology. CTAS testing will performed on outlier wells.

Regards

Adam

From: Mack Dreyer [<mailto:mack@birchwoodenviro.com.au>]
Sent: Thursday, 5 April 2012 9:52 AM
To: Adam Breen; Brendan Ebzery
Subject: Surfactant Flush - Maroochydhore

Adam/Brendan

I am just going through the surfactant flush proposal for the Maroochydhore site and I have a couple of questions that you might be able to help me out with.

1. Has the MPE system at Maroochydhore been recommissioned? I note in section 2.2.1 of the proposal it is mentioned that the MPE system will be turned off for one day prior to injection of the surfactant. If the system has been recommissioned were you able to complete an GME (or at least a partial GME) at the site prior the recommissioning of the system as discussed at our meeting on 13 March (the system had been non-operational for 10 months or so and it would be very beneficial to obtain an understanding of the impacts at the site without the system running for such a long period of time).
2. I note in Section 2.3 of the proposal that the pre-injection monitoring will consist of the analysis of a water sample at the MPE system. Is this adequate considering the MPE system will be drawing from across the site and volatiles are likely to be lost to the vacuum.

3. It appears that we will only be monitoring the injected wells as part of this program. How will you demonstrate that you have maintained hydraulic control? Is there a subsequent GME planned for the site?

Regards

Mack

Mack Dreyer
Principal

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PO Box 2342 Sunnybank Hills 4109



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RTI DL RELEASED EHP

Reference Number: 5212011

7 June 2012

Mr Mack Dreyer

PO Box 2342
Sunnybank Hills QLD 4109

Groundwater Remediation – Surfactant Flush Event
Mobil – Maroochydore
Matilda Blue Service Station
116-118 Sugar Road, Maroochydore, Queensland

Dear Mack,

I am writing to advise of OTEK's intention to undertake additional groundwater remediation enhancement activities at the Matilda Blue service station (formally a Mobil operated service station) site using surfactant flushing techniques, and request review and comment of these remediation activities from you as the sites third party auditor as part of our regulatory approval process.

OTEK have been commissioned by Kleinfelder Australia Pty Ltd (Kleinfelder) to undertake remediation of hydrocarbon impacted groundwater at the site via the operation of a Multi-Phase Extraction (MPE) system. The surfactant injection works are designed to complement and enhance this remediation.

Scope of Work

Target Injection Wells

Two surfactant events will be undertaken on the site with a planned 3 month operation of the on-site MPE system between surfactant flushing events. The scope of work detailed below will be the same for each surfactant event.

A total of 7 wells (MW-1, MW-6, MW-24, MW-26, MW-39, MW-40 and MW-41) were injected with Ivey Sol surfactant. The MPE system was turned off one day prior to injection. Extraction wells that are adjacent to the western or eastern boundary property were injected with surfactant to ensure they are utilised for recovery purposes and to maintain control of the surfactant transport and capture process.

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Solution Injection Volume

The surfactant was prepared as a weak solution (0.75% by vol) in water. A volume of 20 litres of diluted Surfactant solution was injected to each target well. This was followed with approximately 150-litres of clean water to flush the surfactant into the aquifer surrounding the bore.

Duration

The surfactant has been left within the aquifer for an initial residence period of approximately 1 week. This has allowed the fluid to permeate into the impacted aquifer surrounding each well and work to locally de-sorb as much hydrocarbon as possible prior to MPE re-commencement. This residence period also aims to permeate into the lower permeability groundwater pathways (whilst the MPE system is off) as well as the more permeable, hence achieving greater hydrocarbon contact and thus removal.

An approximate hydraulic gradient of 0.19m/m was established using the level survey data and groundwater elevations calculated between Monitoring Well MW-17 to MW-18 (refer to Table 1). The hydraulic conductivity (K) of the aquifer was estimated at between 0.2E-06 based on a rising head test performed by OTEK on the 10 December, 2010. An estimated effective porosity value of 0.15 is assumed loamy sand (US Department of Interior, Bureau of Reclamation). Using these measured and estimated values the maximum rate of groundwater flow is estimated to be approximately 87.8 metres per year or 1.7 metres per week. It should be noted that contaminant flow would most likely be less due to retardation by absorption, dispersion and biodegradation.

MPE Operation

The MPE system will remain in operation post-injection for a period of three months. One week after resumption, gauging off all non extraction wells will occur, vacuum will be measured at all wells and qualitative water tests will be undertaken to determine the presence of surfactant by the degree of liquid bubbling. Gauging and vacuum monitoring will then occur fortnightly. Six weeks after resumption of extraction six wells will be sampled for BTEX and TRH with four of the samples additionally analysed for Cobalt Thiocyanate Active Substances (CTAS). Based upon the results of sampling the timing for the next sampling event will be determined. The surfactant is meant to have a half life in the ground of approximately 4 weeks.

Yours sincerely,

sch4p4(6) Personal information

Adam Breen
Senior Remediation Scientist

sch4p4(6) Personal information

Brendan Ebzery
Senior Principal Remediation Scientist

O'Connor Gary

From: Mack Dreyer [mack@birchwoodenviro.com.au]
Sent: 4 June 2012 12:56 PM
To: O'Connor Gary
Subject: Sugar Rd Maroochydore
Attachments: Cumulative Mass removal 0511.pdf; Commentry 0511 mass removal.pdf
 Gary

As discussed please find attached the hydrocarbon recovery graph and some commentary provided by Otek for the Sugar Rd site. As you can see the recoveries are consistent over the monitoring period (no real improvement over the 3 month period) and we are looking at recoveries of approx. 200kg per month. Hence my on-going concerns.

Give me a call if you have any questions.

Regards

Mack

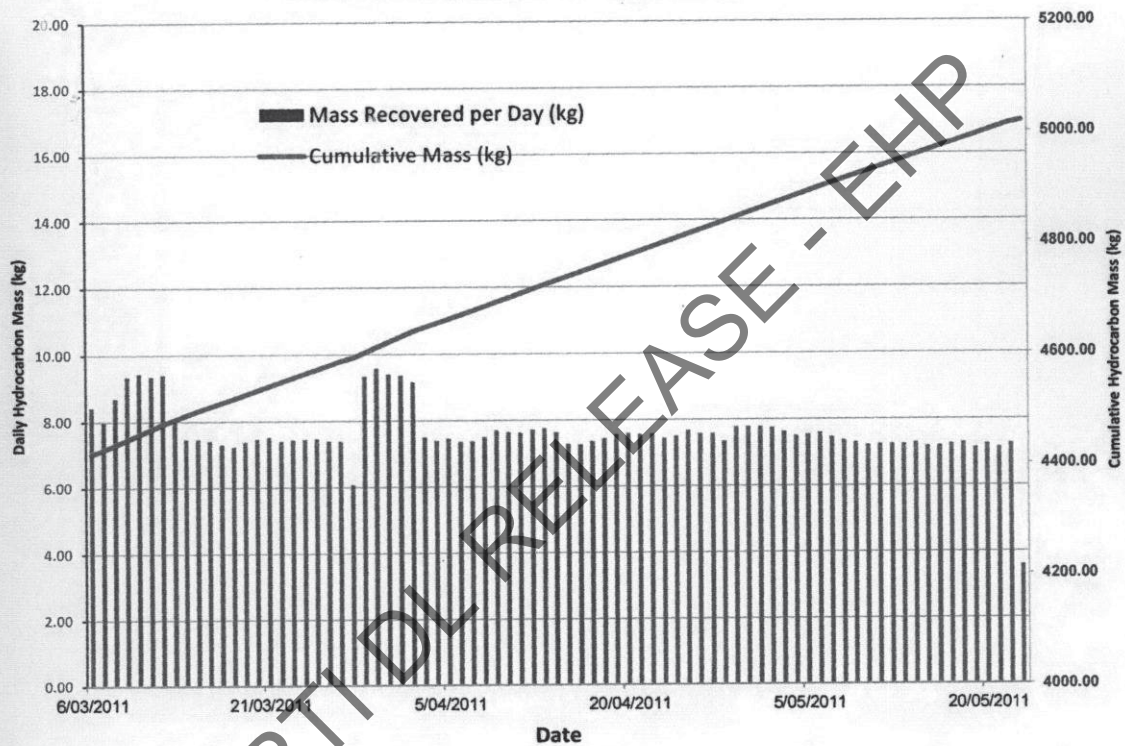
Mack Dreyer
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Daily and Cumulative Hydrocarbon Mass Recovered



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6.4.1 System Runtime

Between 4 March 2011 and 23 May 2011 the remediation system was operational for 99.6% of the total possible runtime. The system was operational during the 80 days of this time period. The majority of the downtime was due to minor system faults that were repaired or rectified.

6.4.2 Radius of Influence (ROI) Measurements

The groundwater drawdown and negative pressure (vacuum) obtained at each monitoring well over the entire operation and maintenance period is summarised in Table 3. The maximum ROI measured in monitoring wells surrounding the extraction well network are illustrated on Figure 6. Based on the vacuum within each well, the ROI extends up to approximately 20 m from the extraction points on the southern portion of the site. Monitoring Wells MW-3, MW-4, MW-8, MW-9, MW-10 indicated vacuum influence on the eastern corner of the site (refer to Figure 6).

The Extraction Well and Line Vacuum pressures are highlighted in Table 3, and indicate that an even amount of groundwater vacuum pressure was applied to each operating extraction well from the March to May operation period.

6.4.3 Hydrocarbon Mass Removal

Hydrocarbon recovery by the remediation system is calculated using the following equation.

$$\text{Mass (kg)} = \frac{(\text{MW} \times \text{C})}{\text{RT}} \times 1 \times 10^{-6} \times \text{MPE Flow} \times \text{MPE Runtime}$$

Where:

C = Hydrocarbon concentration (ppmv);

R = 0.08205 (universal gas constant);

T = Temperature in Kelvins;

MPE Flow (m³/min);

MPE Runtime (min); and

MW = Molecular weight (hexane = 84 g/mole).

Approximately **563** kg of hydrocarbons have been removed between 4 March 2011 and 23 May 2011, immediately prior to system shutdown before conducting the GME. A total of **4,965** kg of hydrocarbons have been removed from this site since the beginning of this remediation system's operation in October 2009 as shown in Appendix C. The rate of hydrocarbon mass removal has maintained his high level since October 2010 coinciding with reducing the level of extraction in the neighbouring ford premises due to low hydrocarbon concentrations in this area. This involves an increase in the vacuum extraction efficiency on the remaining wells that are functioning on-site and in-turn remove more contaminated groundwater.

6.5 Groundwater Quality Results

Groundwater quality values obtained for measured parameters are provided in Table 2.

Groundwater parameter ranges were as follows:

O'Connor Gary

From: Mack Dreyer [mack@birchwoodenviro.com.au]
Sent: 4 June 2012 11:49 AM
To: Jackie Wright
Cc: O'Connor Gary
Subject: FW: Maroochydhore
Attachments: 5209012 HRA Final.pdf
 Jackie

Following our discussions the other day Otek have forwarded me the revised risk assessment for the former Mobil site at Maroochydhore. Could I please get you to review and provide comment on this amended report.

I haven't gone through the report in any detail but I am concerned with the derived SSTLs in Table 8.6.1, they just seem too high to have land removed from the EMR (but I will defer to you on that one). I do note that the service station site will remain on the EMR with a SMP but the Stegbar site (to the north) and the Pacific Ford site (to the west) have been put on the EMR as a result of impacts from the service station site and it is a requirement of the Remediation Notice to have these adjacent land parcels removed from the EMR. As I understand it the SSTLs in Table 8.6.1 have been derived to have these land parcels removed from the EMR.

Thanks for your help with this and please give me a call if you have any questions.

Regards

Mack

Mack Dreyer
Principal

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From: Adam Breen [mailto:ABreen@otek.com.au]
Sent: Monday, 4 June 2012 9:13 AM
To: Mack Dreyer (mack@birchwoodenviro.com.au)
Cc: luis.cifuentes@exxonmobil.com
Subject: Maroochydhore

Mack,

Please find attached the amended HRA report following Jackie's comments for Maroochydhore. I have been really busy in the field of late and only have just had a chance to get around to these items. The additional information you requested such as the remediation strategy and direction forward will be

sent soon. I have sent you some information pertaining to this previously.

Regards



Adam Breen
Senior Remediation Scientist

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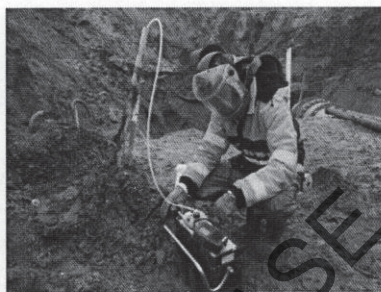
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Revision of Site Specific Target Levels

Neumann Service Station (QL3815)

116-118 Sugar Road, Maroochydore, QLD



Prepared for: Mobil Oil Australia Pty Ltd

Project Job Number: 5209012 / 2006

Date Submitted: 17 May 2012

Submitted by: OTEK Australia Pty Ltd

Name: Charles Grimison

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Revision of Site Specific Target Levels

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Report Issued:	Draft	20 October 2011
	Preliminary Final	20 December 2011
	Final	17 May 2012

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5209012 / 2006

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This report is subject to limitations presented in Section 10.

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Acronyms

Acronym	Definition
ADI	Acceptable Daily Intake
ADF	Automotive Diesel Fuel
ANZECC	Australian and New Zealand Environment and Conservation Council
ARMCANZ	Agricultural and Resource Management Council of Australia and New Zealand
ASTM	American Society for Testing and Materials
ATSDR	Agency for Toxic Substances and Disease Registry
BTEX	Benzene, Toluene, Ethylbenzene, Xylenes (m-, o- and p-)
BUA	Beneficial Use Assessment
CCME	Canadian Council of Ministers of the Environment
CLM	Contaminated Land Management
COPC	Chemical of Potential Concern
CSF	Cancer Slope Factor
CSM	Conceptual Site Model
DECC	NSW Department of Environment and Climate Change
DP	Deposited Plan
EC	Electrical Conductivity
EC##	Effects Concentration. EC50 = Median Effects Concentration.
EIL	Ecological Investigation Level (NEPC, 1999)
ELS	Early Life Stage
EMP	Environmental Management Plan
EPBC	Environment Protection and Biodiversity Conservation
ERA	Ecological Risk Assessment
ESA	Environmental Site Assessment
ETSA	Electricity Trust of South Australia
FAO	Food and Agriculture Organisation
FDU	Fuel Dispensing Unit (i.e. Bowser)
GME	Groundwater Monitoring Event
HERA	Human Health and Environmental Risk Assessment
HI	Hazard Index
HIL	Health Investigation Level (NEPC, 1999)
HQ	Hazard Quotient
HUB	Hydrocarbon Utilising Bacteria

Acronym	Definition
IC	Inhibition Concentration
IRIS	Integrated Risk Information System
km	Kilometre
L	Litre
LC	Lethal Concentration
LOEC	Lowest Observed Effect Concentration
LOR	Limit Of Reporting
LPG	Liquid Petroleum Gas
LMS	Leaded Motor Spirit
LRP	Lead Replacement Petroleum
mbgs	metres below ground surface
mg/kg	milligram(s) per kilogram
mg/L	milligram(s) per litre
MNA	Monitored Natural Attenuation
MPC	Maximum Permissible Concentration
MW	Monitoring Well (Groundwater)
NEPC	National Environment Protection Council
NEPM	National Environment Protection (Assessment of Site Contamination) Measure 1999
NHMRC	National Health and Medical Research Council
NICNAS	National Industrial Chemical Notification and Assessment Scheme
NOEC	No Observed Effect Concentration
NTP	National Toxicology Program
OECD	Organisation for Economic Co-operation and Development
OH&S	Occupational Health and Safety
OSHA	Occupational Safety & Health Administration (USA)
OTEK	OTEK Australia Pty Ltd
PAHs	Polyaromatic Hydrocarbons
PEL	Permissible Exposure Level
PHC	Petroleum Hydrocarbon
PID	Photo-ionisation Detector
PNEC	Predicted No Effect Concentration
PSH	Phase Separated Hydrocarbon
PUMS	Premium Unleaded Motor Spirit

Acronym	Definition
RAP	Remediation Action Plan
RfC	Reference Concentration
RfD	Reference Dose
RME	Reasonable Maximum Exposure
RP	Registered Plan
RBSL	Risk-based Screening Level
SADME	South Australian Department of Mines and Energy
SAHC	South Australian Health Commission
SAP	Sampling and Analysis Plan
SIL	Soil Investigation Level (<i>EIL, HIL or guideline</i>)
SMP	Site Management Plan
SP	Survey Plan
SQL	Soil Quality Level (CCME, 2008)
SSTL	Site Specific Target Level
SVE	Soil Vapour Extraction
TDI	Tolerable Daily Intake
TDS	Total Dissolved Solids
TEA	Tank Excavation and Assessment
TGA	Therapeutic Goods Administration
TPH	Total Petroleum Hydrocarbons
TPW	Tank Pit Well, also referred to as TPMW Tank Pit Monitoring Well
TPHCWG	Total Petroleum Hydrocarbon Criteria Working Group
TRV	Toxicity Reference Value
TWA	Time Weighted Average
UMS	Unleaded Motor Spirit
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
WAF	Water Available Fraction (=WSF)
WHO	World Health Organisation
WSF	Water Soluble Fraction (=WAF)
VOCs	Volatile Organic Compounds
QSAR	Quantitative Structure Activity Relationship

Executive Summary

OTEK Australia Pty Ltd (OTEK) was engaged by Mobil Oil Australia Pty Ltd (Mobil) to revise existing Site-Specific Target Levels (SSTLs) so they are suitable as on-site remediation end-points for hydrocarbon impacted groundwater sourced from the Neumann's Matilda Blue Maroochydore Service Station (QL3815) located at 116-118 Sugar Road, Maroochydore, Queensland (the site) (Figure 1).

The site is currently listed on the Department of Environment and Resource Management (DERM), Contaminated Land Register (CLR). In addition, the neighbouring properties to the north (Stegbar on Lot 7 on Plan RP848505) and to the west (Pacific Ford Lot 2 on Plan RP176929) are listed on the DERM Environmental Management Register (EMR).

A risk assessment – Coffey (2010) *Human Health and Ecological Risk Assessment* – has previously been prepared for the site. The Coffey (2010) report has been reviewed by the Third Party Reviewer and the SSTLs within the report have been endorsed.

The objectives of this risk assessment were to:

- Assess the on- and off-site risks to humans and the environment from exposure to hydrocarbon impacted groundwater originating from the site;
- Develop remediation end points for the site to enable the site listing to be transferred from the DERM CLR to the DERM EMR; and
- Develop remediation goals for the off-site properties (Stegbar and Pacific Ford) to be removed from the EMR, using HSL-A residential with garden (slab on grade and basement scenarios).

The potential threshold and non-threshold risks, as presented in Coffey (2010), were reviewed. The report indicated that at September 2008 groundwater concentrations at the site, which were significantly higher than present levels, did not pose a potentially unacceptable risk to on- and off-site site workers or intrusive maintenance trench workers. This conclusion was inferred to be the same for the current on-site scenario. As the site did not present an unacceptable risk to site workers or on-site intrusive maintenance trench workers the site was considered suitable for continued petroleum use based on the following assumptions:

- The site will continue to be used as a service station;
- No changes are made to the layout and configuration of the existing site infrastructure (buildings, canopy etc.);
- The integrity of the concrete surface is maintained during operation of the site as a service station;
- Standard service station operating protocols are maintained; and
- Appropriate health and safety procedures (including PPE) are implemented during intrusive works at the site, including excavation of pits and trenches, and include the use of vapour monitoring during works.

For receptors where an unacceptable risk was identified by Coffey (2010), ie; potential future residents (living in houses with and without basements) off-site workers (if the off-site areas were redeveloped with basements) and construction workers, a re-evaluation was undertaken using recent (June 2011) groundwater analytical data. The current re-assessment was conducted as Otek installed a multi-phase extraction (MPE) system in October 2009. As such, the conclusions drawn by Coffey (2010) were considered to be invalidated as conditions had changed.

The results from the assessment indicated that a potentially unacceptable risk may exist for slab on grade residents as the HI (1.1) and ILCR (1.1E-05) were marginally above their respective acceptable values of 1.0 and 1.0E-05. The results for the basement scenario incorporating seepage and cumulative exposure in a basement and first floor resulted in HI of 0.4, which is acceptable and an ILCR of 1.5E-05, which was marginally above the acceptable value of 1.0E-05. The re-calculated SSTLs based on the ILCR results are:

COPC	Current Concentration (mg/L)	SSTL
Benzene	0.644	0.43
TPH C ₁₀ -C ₁₄ (aliphatic)	0.38	0.35

The concentrations of all other COPC (toluene, ethylbenzene, xylenes, naphthalene, TPH C₆-C₉ and TPH C₁₀-C₁₄ aromatic) did not significantly influence the HI values and as such there was no requirement to re-evaluate their concentrations from those used in the assessment.

Fate and transport modelling indicated the hydrocarbon plume as of September 2008, would not migrate beyond 100m from the site and would therefore not reach ecological receptors located approximately 500m from the site. The conclusion was also deemed suitable for the current scenario.

In order to remove the adjoining properties from the EMR, the sites must attain unrestricted use. Therefore the criteria used to assess the sites was determined to be HIL-A residential with garden. This was assessed as slab on grade and basement scenarios. The assessment is hypothetical, as the properties are currently zoned as commercial.

It is considered that once groundwater concentrations at the site are below the SSTLs presented in the table above, the site will be suitable for transfer from the DERM CLR to the DERM EMR and the off-site areas will be suitable for removal from the EMR.

1 Introduction

OTEK Australia Pty Ltd (OTEK) was engaged by Mobil Oil Australia Pty Ltd (Mobil) to revise existing Site-Specific Target Levels (SSTLs) so they are suitable as on-site remediation end-points for hydrocarbon impacted groundwater sourced from the Neumann's Matilda Blue Maroochydore Service Station (QL3815) located at 116-118 Sugar Road, Maroochydore, Queensland (the site) (Figure 1).

The site is currently listed on the Department Of Environment and Resource Management (DERM), Contaminated Land Register (CLR). In addition, the neighbouring properties to the north (Stegbar on Lot 7 on Plan RP848505) and to the west (Pacific Ford Lot 2 on Plan RP176929) are listed on the DERM Environmental Management Register (EMR).

A risk assessment – Coffey (2010) *Human Health and Ecological Risk Assessment* – has previously been prepared for the site. The Coffey (2010) report has been reviewed by the Third Party Reviewer and the SSTLs within the report have been endorsed.

2 Objectives

The objectives of this risk assessment were to:

- Assess the on- and off-site risks to humans and the environment from exposure to hydrocarbon impacted groundwater originating from the site; and
- Develop remediation end points for the site to enable the site listing to be transferred from the DERM CLR to the DERM EMR; and
- Develop remediation goals for the off-site properties (Stegbar and Pacific Ford) to be removed from the EMR.

A SSTL is the concentration of a Contaminant of Potential Concern (COPC) in an environmental medium (e.g. soils, groundwater) that does not pose an unacceptable level of risk to a receptor under specified assumptions of exposure to that medium.

3 Scope of Work

The scope of work was undertaken in accordance with enHealth (2004) and NEPC (1999) recommendations and involved the following:

- Review the potential human health and ecological risks posed from petroleum impacted groundwater identified beneath the site and beneath down-gradient off-site areas;
- Review risk-based Site Specific Target Levels (SSTLs) for groundwater that are protective of on- and off-site human health and ecological receptors (Stegbar and Pacific Ford);
- Re-evaluate the HI and ILCR results using recent groundwater data; and

Use the maximum reported recent groundwater data from on-site and off-site to develop SSTLs, with the objective of enabling the adjoining off-site properties (Pacific Ford and Stegbar) to be removed from the EMR.

4 Site Description

A concrete surface covers the majority of the site with the exception of several small grassed areas immediately to the north and east of the salesroom and along the properties eastern and southern boundaries adjacent to the footpath and road reserve (refer to Figure 2). Site infrastructure comprises a sales building, a mechanic garage, five Underground Storage Tanks (USTs, see Table 4.8.1), associated underground piping and fill points, six fuel dispensing units and a Triple Interceptor Trap (TIT).

Table 4.1: Summary of Site Description Details

Facility Name	Neumann's Matilda Blue Maroochydore Service Station (Former Mobil Service Station)
Mobil Site Number	QL3815
Address	116-118 Sugar Road, Maroochydore, Queensland
Lot and Deposited Plan	Lots 1 on Plan RP176929
Site Operator	Neumann's Matilda Blue Maroochydore Service Station
Site Use	Petroleum Service Station
Zoning	Business and Industry (Maroochy Plan 2000)
Site Area	Approximately 2,133 m ²

4.1 Surrounding Land Uses

The land uses adjoining the service station are summarised in Table 4.1.1 below. The site is currently within a commercial zone and is covered with concrete except for grass and gardens situated along the site boundaries (refer Figure 2).

Table 4.1.1: Surrounding Land Uses

Direction (Relative to site)	Surrounding Site Use (Nature of Activity)
North-east	Sugar Road; with residential properties beyond
North-west	Adjacent site; various commercial properties (Stegbar)
East	Sugar Road; with various commercial property beyond
South	Sugar Road; with various commercial property beyond
South-west	Adjacent site; with various commercial properties (120 Sugar Road, Pacific Ford)
West	Adjacent site; with various commercial (Pacific Ford)

The closest surface water body is a small lagoon located approximately 500m to the north-west of the site.

4.2 Local Geology and Soil Lithology

According to the Department of Mine and Energy's Interactive Resource and Tenure Maps, the site is located on Quaternary alluvial and colluvial deposits consisting of floodplain alluvium. The likely formation underlying the Quaternary alluvium is the Triassic aged Landsborough Sandstone consisting of lithofeldspathic labile and quartzose sandstone, siltstone, shale and minor coal (OTEK, 2009).

Based on the Queensland Department of Mines (1986), Groundwater Resources of Queensland, Mines Department Series: Map 4 (1:2,500,000), groundwater in the region is typically of moderate salinity (Total Dissolved Ions 500mg/L – 1500mg/L) and low bore yield (<5L/sec).

4.3 Site Specific Geology

The sub-surface soil lithology at the site is described in the Table 4.3.1 below (IT Environmental 2007; as cited by Coffey 2010).

Table 4.3.1: General On-Site Soil Lithology

Depth (mBGS)	Lithology
0.0 – 0.2	Surface covering: Concrete
0.2 – 0.5	Gravelly sandy clay: medium plasticity, brown, soft, coarse gravel
0.5 – 1.0	Sandy clay: high plasticity, red/white mottling, firm, dry
1.0 – 2.0	Clay: high plasticity, red/white or orange mottled, soft, moist
2.0 – 2.7	Sandy clay: high plasticity, grey, soft, moist
2.7 – 5.0 (extent of investigation)	Clay: high plasticity, black/grey, soft, saturated

4.4 Hydrogeology

Site-specific observations of the localised groundwater from the OTEK January 2011 Groundwater Monitoring Event (GME) are summarised in Table 4.4.1 below.

Table 4.4.1: Site Specific Hydrogeology

Parameter	Comments
Depth to Groundwater	Groundwater gauging at the site indicated a depth to water ranging from 0.385 metres to TOC at Monitoring Well MW-1 to 2.852 metres to TOC at Monitoring Well MW-25. All elevations measurements are relative to Australian Height Datum (AHD) and range between 1.207 to 5.453mAHD
PSH	No PSH was observed at the Site during the January 2011 GME. PSH was last recorded at the Site in January 2010 in Monitoring Well MW-1, which showed a straw coloured layer of PSH approximately 1mm in thickness
Flow Direction	The groundwater flow direction is generally towards the south westerly to westerly direction across the site.
Water Bearing Unit	As reported by Coffey (2010) groundwater at the Site is encountered within the clay and sandy clay lithologies.
Groundwater Gradient	The hydraulic gradient of the aquifer is estimated to be 0.042 m/m
Hydraulic Conductivity	The hydraulic conductivity (K) of the aquifer was estimated at between 0.232 and 0.689 m/day based on data obtained from the Coffey Environments February/March 2009 groundwater monitoring data (Coffey Environments 2009; as cited by OTEK, 2009)
Porosity	An estimated effective porosity value of 0.10 is assumed (Coffey 2010)
Groundwater Velocity	Using the measured and estimated values (above) the maximum rate of groundwater flow was estimated to be approximately 9 metres per year
Potential groundwater discharge zones	As reported by Coffey (2010), Stormwater drains surrounding the site flow into a gully located approximately 250m to the south of the site, which discharges into a downstream lagoon located approximately 500m to the south-west of the site.
Potential Beneficial Uses of Groundwater	As reported in Coffey (2010), TDS at the site ranges between 100-1500mg/L, which is a suitable range for domestic, recreational and potable use. The potential for this shallow groundwater to be used as potable water, however; has not been considered further as a reticulated water supply exists at the site and groundwater is not present in sufficient volume for extraction for beneficial uses.

4.5 Registered Groundwater Bores

A groundwater bore search undertaken by OTEK in December 2011 indicated that no registered groundwater bores are located within 1km of the Site. One sub-artesian bore, #14100071 was located approximately 900m to the north east of the Site but has been abandoned. As reported by Coffey (2010, citing Coffey 2009), it was also noted that the area is not within a proclaimed water use area, and therefore groundwater bores are not required to be registered.

4.6 Topography and Drainage

The elevation of the site is approximately 10 mAHN (Google Earth). The regional topography surrounding the site is moderately sloped to the south and west. As reported by Coffey (2010), stormwater drains surrounding the site flow into a gully located approximately 250m to the south of the site, which discharges into a downstream lagoon located approximately 500m to the south-west of the site.

4.7 Local Climate and Rainfall

Climate data from the Bureau of Meteorology at the closest weather station to the site, Sunshine Coast Airport, (located 8 km from the site) indicates:

- Mean rainfall at the site is 57.2 (September) to 178.7 (January) mm/month;
- Mean annual rainfall is 1434.0 mm/year;
- Mean 3 PM wind speed is between 18.2 km/h and 24.5 km/h; and
- Mean temperature is between 15.9°C and 27.1°C

4.8 On-Site Fuel/Chemical Storage Facilities

On-site fuel system infrastructure is summarized below in Table 4.8.1 and shown on Figure 2. Other on-site facilities include six fuel bowsers and a TIT.

Table 4.8.1: Details of Fuel Infrastructure

Identification	Capacity & Product	Construction / Date Installed
T1	45 kL PULP	Unknown
T2	44 kL PULP (abandoned)	Unknown
T3	44 kL ULP	Unknown
T4	44 kL ULP	Unknown
T5	44 kl ADO	Unknown

Note: Tank information from Groundwater Monitoring Event and System Performance Report (OTEK, 2010)
ADO – Automotive Diesel Oil
PULP – Premium Unleaded Petrol
ULP – Unleaded Petrol

5 Data Collection and Evaluation

5.1 Summary of Groundwater Concentrations

The most recent groundwater sampling at the site occurred in June 2011. Sampling of select monitoring wells was also undertaken in March and April 2011. Historical results (Table 4) indicate that groundwater concentrations, whilst exhibiting a small level of fluctuation, are generally decreasing. The minor observed fluctuations are potentially linked to changes in groundwater levels and the heterogeneity of the subsurface. The concentrations of COPC in groundwater have decreased following the implementation of multi-phase extraction (MPE) system by Otek in October 2009. The use of the MPE system has extracted over 4400kg of hydrocarbons up to January 2011. As such, data used by Coffey (2010) to develop SSTL's are not considered to represent existing on-site or off-site conditions and therefore a re-evaluation of the risks and subsequent SSTL values has been undertaken using the most recent (June 2011) data collected by Otek.

5.1.1 Soil COPC Concentrations

Off-site soil characterisation was undertaken by Otek in 2010 as part of monitoring well installation. The analysis of soil samples for BTEX, TPH and PAH reported all concentrations below analytical detection limits.

5.1.2 On-Site Maximum Groundwater Concentrations

The maximum concentrations from on-site monitoring wells collected during the June 2011 GME have been used as the basis for assessing the on-site scenarios. The maximum reported concentrations from the June 2011 GME are presented in Table 5.1.1 with comparative results from September 2008 used in the Coffey (2010) Health Risk Assessment.

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Table 5.1.1: Maximum On-Site Groundwater Concentrations

Analyte	Maximum Reported Concentration (mg/L)	Monitoring Well	Maximum Reported Concentration (mg/L) Sept 2008 ¹	Monitoring Well
Benzene (C ₆)	1.93	MW-25	9.46	MW-25
Toluene (C ₇)	3.88	MW-2	6.31	MW-25
Ethylbenzene (C ₈)	0.842	MW-2	0.876	MW2
Xylenes (C ₈)	5.71	MW-2	4.01	MW-25
Naphthalene (C ₁₀)	0.089	MW-25	0.859	MW-25
TPH C ₆ -C ₉	12.40	MW-2	20.00	MW-25
TPH C ₁₀ -C ₁₄	3.22	MW-25	5.05	MW-25
TPH C ₁₅ -C ₂₈	1.42	MW-25	3.50	MW-25
TPH C ₂₉ -C ₃₆	0.140	MW-24	0.380	MW-25
1,2-dichloroethane		MW-18	0.020 ²	MW-25

Notes: 1. Coffey (2010) Health Risk Assessment

2. Concentration from September 2008 GME and represents the highest recorded concentration of this analyte.

The results from June 2011 indicate that the maximum concentrations for toluene, xylenes, and TPH C₆-C₉, are now present in MW2, whereas the maximum reported concentrations for these COPC were historically found in MW25. MW2 is located on the eastern side of the site, near the verge of Sugar Road. This monitoring well is not part of the MPE system.

5.1.3 Maximum Off-Site Groundwater Concentrations

The maximum off-site groundwater concentrations were reported from MW-13, which has historically reported the highest concentrations for the COPC. The maximum reported results from June 2011 are presented in Table 5.1.2 with comparative results from September 2008 used in the Coffey (2010) Health Risk Assessment.

Table 5.1.2: Maximum Off-Site Groundwater Concentrations

Analyte	Maximum Reported Concentration (mg/L)	Monitoring Well	Maximum Concentration (mg/L) Sept 2008 ¹	Monitoring Well
Benzene (C ₆)	0.644	MW18	12.40	MW13
Toluene (C ₇)	0.842	MW13	25.40	MW13
Ethylbenzene (C ₈)	0.160	MW13	1.28	MW13
Xylenes (C ₈)	3.530	MW13	14.07	MW13
Naphthalene (C ₁₀)	0.073	MW13	0.302	MW13
TPH C ₆ -C ₉	5.880	MW13	58.00	MW13
TPH C ₆ -C ₉ (-BTX)	1.110	MW13	4.85	MW13
TPH C ₁₀ -C ₁₄	3.060	MW13	79.40	MW13
TPH C ₁₅ -C ₂₈	0.750	MW18	11.40	MW13
TPH C ₂₉ -C ₃₆	0.300	MW31	0.730	MW13

The results for off-site monitoring wells indicate that marked reductions in the concentration of COPCs has occurred since September 2008.

5.1.4 TPH Fractionation Data

TPH fractionation analysis (aliphatic and aromatic) was also conducted on several samples collected from on-site (MW1, 2, 3, 6, 8, 24, 25) and off-site (MW13, 18, 19) monitoring wells during the June 2011 GME. The maximum reported concentrations for C₁₀-C₁₄, C₁₅-C₂₈ and C₂₉-C₃₆ fractions are presented in Table 5.1.5.

Table 5.1.3: Maximum TPH Fractionation Data On and Off-Site (June 2011)

Analyte	On-Site		Off-Site	
	Concentration (mg/L)	Monitoring Well	Concentration (mg/L)	Monitoring Well
TPH C ₁₀ -C ₁₄ aliphatic ₄	0.20	MW1	0.380	MW13
TPH C ₁₅ -C ₂₈ aliphatic ₄	0.50	MW1	<LOR	All
TPH C ₂₉ -C ₃₆ aliphatic ₄	0.10	MW24	<LOR	All
TPH C ₁₀ -C ₁₄ aromatic	0.93	MW25	1.720	MW13
TPH C ₁₅ -C ₂₈ aromatic	<LOR	All	<LOR	All
TPH C ₂₉ -C ₃₆ aromatic	<LOR	All	<LOR	All

6 Site History

6.1 Previous Environmental Investigations

This section provides a synopsis of the known previous environmental investigations conducted at the site. This information has been used to identify the nature and extent of contamination at the site.

Table 6.1.1 presents a chronology of environmental investigations conducted at the site.

Table 6.1.1: Previous Environmental Investigations

Report	Company (Date Issued)	Purpose/Work Scope	Results
Post Phase 2 Environmental Assessment	IT Environmental 2005	Unknown – Report not available for review	Unknown – Report not available for review
Post Phase 2 Environmental Assessment	IT Environmental 2007	Unknown – Report not available for review	Unknown – Report not available for review
September and October 2008 Pre and Post Multi Phase Extraction Groundwater Monitoring Event and Operations & Maintenance Performance Report	Coffey Environments 2009	Unknown – Report not available for review	Unknown – Report not available for review
Groundwater Monitoring Event and Operations & Maintenance Performance Report	Coffey Environments 2009	Unknown – Report not available for review	Unknown – Report not available for review
February and March 2009 Pre and Post Multi Phase Extraction Groundwater Monitoring Event and Operations & Maintenance Report	Coffey Environments 2009	Unknown – Report not available for review	Unknown – Report not available for review

Report	Company (Date Issued)	Purpose/Work Scope	Results
Health and Environmental Risk Assessment	Coffey Environments 2009	To evaluate potential impacts to human health and environment associated with the petroleum impacted groundwater currently identified onsite and offsite and, where required develop risk-based levels (remediation goals) for the investigation area.	<ul style="list-style-type: none"> Based on available data and constraints of the assessment model, groundwater fate and transport modelling indicates that when the groundwater plume reaches stabilised conditions, marine ecological water quality guidelines for BTEX compounds may be exceeded up to a distance of 60m hydraulically down-gradient of the source zone Given chemicals of potential concern concentrations within the groundwater plume exceed criteria established for potable and recreational use, groundwater on-site and off-site within the area of investigation may not be suitable for extractive uses Based on available data, exposure assumptions and constraints of the exposure assessment model, it was considered that measured COPC concentrations in groundwater, as presented in this report, may pose an unacceptable health risk to: <ul style="list-style-type: none"> Potential future off-site residential occupants within a slab-on-ground residential dwellings at 120 Sugar Road where vapours emitted within the sub-surface migrate into a slab-on-ground structure; Potential future off-site residential occupants within a single level basement structure at 120 Sugar Road where vapours emitted within the sub-surface migrate into a slab-on-ground structure; Off-site maintenance workers within a sub-surface maintenance trench where workers come into direct contact with petroleum hydrocarbon impacted groundwater, and/or inhale COPC vapours emitted from impacted groundwater within the trench; and Off-site construction workers within a single level basement excavation at 120 Sugar Road where workers come into direct contact with petroleum hydrocarbon impacted groundwater, and/or inhale COPC vapours emitted from impacted groundwater within the excavation. RBLs for the Site and off-site properties were subsequently developed

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Report	Company (Date Issued)	Purpose/Work Scope	Results
Groundwater Monitoring Report and System Performance Report	OTEK 2010 (January)	To gauge and sample existing monitoring wells and assess effectiveness of remediation system.	<p>The following summarises the key results of the January 2010 GME:</p> <ul style="list-style-type: none"> • Groundwater stabilised between 1.670 metres to TOC at Monitoring Well MW-1 to 2.662 metres to TOC at Monitoring Well MW-22 • PSH was recorded in Monitoring Well MW-1, which showed a straw coloured layer of PSH approximately 1mm in thickness • The flow direction of the aquifer was calculated to be flowing in a south westerly to westerly direction across the site • BTEX concentrations above criteria were detected in 11 groundwater samples • Total TPH concentrations exceeding the adopted criteria (10,000µg/L) were detected in 7 groundwater samples • Natural attenuation is occurring on the site, however, is probably unlikely to be considered to be occurring at levels which would aid in remediation of the site • The system has been operating for approximately 94.7% of the time it has been on-site. In this time the system has had the effect of dewatering the local area, creating a cone of depression around the hydrocarbon contaminated areas of the site. This has lead to the successful treatment of groundwater and vapour removed from the vadose zone. • The total calculated mass of hydrocarbons removed from the site until February 2010 was approximately 2,992kg

Report	Company (Date Issued)	Purpose/Work Scope	Results
Groundwater Monitoring Report and System Performance Report	OTEK 2010 (April)	To gauge and sample existing monitoring wells and assess effectiveness of remediation system.	<p>The following summarises the key results of the April 2010 GME:</p> <ul style="list-style-type: none"> • Groundwater stabilised between 0.772 metres to TOC at Monitoring Well MW-6 to 2.122 metres to TOC at Monitoring Well MW-33 • PSH was not recorded in any monitoring well • The flow direction of the aquifer was calculated to be flowing in a south westerly to westerly direction across the site • BTEX concentrations above criteria were detected in 8 groundwater samples • Total TPH concentrations exceeding the adopted criteria (10,000µg/L) were detected in 2 groundwater samples • Natural attenuation is occurring on the site • The system has been operating for approximately 95.8% of the time it has been on-site. In this time the system has had the effect of dewatering the local area, creating a cone of depression around the hydrocarbon contaminated areas of the site. This has lead to the successful treatment of groundwater and vapour removed from the vadose zone • The total calculated mass of hydrocarbons removed from the site until April 2010 was approximately 3,429kg

Report	Company (Date Issued)	Purpose/Work Scope	Results
Groundwater Monitoring Report and System Performance Report	OTEK 2010 (September)	To gauge and sample existing monitoring wells and assess effectiveness of remediation system.	<p>The following summarises the key results of the September 2010 GME:</p> <ul style="list-style-type: none"> • Groundwater stabilised between 0.912 metres to TOC at Monitoring Well MW-1 to 3.197 metres to TOC at Monitoring Well MW-25 • PSH was not recorded in any monitoring well • The flow direction of the aquifer was calculated to be flowing in a south westerly to westerly direction across the site • BTEX concentrations above criteria were detected in 6 groundwater samples • Total TPH concentrations exceeding the adopted criteria (10,000µg/L) were detected in 1 groundwater samples • Natural attenuation is occurring on the site • The system has been operating for approximately 98.8% of the time it has been on-site. In this time the system has had the effect of dewatering the local area, creating a cone of depression around the hydrocarbon contaminated areas of the site. This has lead to the successful treatment of groundwater and vapour removed from the vadose zone • The total calculated mass of hydrocarbons removed from the site until September 2010 was approximately 3,710kg

Report	Company (Date Issued)	Purpose/Work Scope	Results
Draft Groundwater Monitoring Report and System Performance Report	OTEK 2011 (January)	To gauge and sample existing monitoring wells and assess effectiveness of remediation system.	<p>The following summarises the key results of the January 2011 GME:</p> <ul style="list-style-type: none"> Groundwater gauging at the site indicated a depth to water ranging from 0.385 metres to TOC at Monitoring Well MW-1 to 2.852 metres to TOC at Monitoring Well MW-25 PSH was not detected in all Site monitoring wells The flow direction of the aquifer was calculated to be flowing in a south westerly to westerly direction across the site BTEX concentrations above criteria were detected in 5 groundwater samples Total TPH concentrations exceeding the adopted criteria (10,000µg/L) were detected in 2 groundwater samples Natural attenuation is occurring on the site The system has been operating for approximately 90.8% of the time it has been on-site. In this time the system has had the effect of dewatering the local area, creating a cone of depression around the hydrocarbon contaminated areas of the site. This has lead to the successful treatment of groundwater and vapour removed from the vadose zone The total calculated mass of hydrocarbons removed from the site until January is approximately 4,401kg

6.2 Zoning

According to the Maroochy Plan 2000, the site is zoned Business and Industry. Uses considered appropriate in the Precinct include:

- Automotive sales, services and repairs;
- Small to medium scale service trades outlets;
- Business and commercial equipment repairs and service outlets;
- Small to medium scale tourism and industry service providers;
- Small to medium scale manufacturing establishments;
- Small to medium scale transport, storage, and distribution depots;
- Showrooms;
- Service stations;
- Some professional offices; and

- Limited convenience services including convenience stores, fast food outlets and snack bar facilities.

6.3 Previous Potential Contaminant Releases

The hydrocarbon impact at the site is assumed to have originated as a result of a leaking UST and fuel line(s) / bowser(s) which have since been replaced. The exact time of release is unknown.

6.4 Groundwater Remediation Strategy

OTEK is currently operating a semi-permanent Multi-Phase Extraction (MPE) system, which has been in operation since October 2009. The remediation strategy is being used to remove residual PSH and reduce dissolved-phase concentrations to levels that will not adversely impact human or ecological receptors. Natural attenuation will be employed to further reduce dissolved-phase concentrations once active remediation has finished.

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7 Risk Assessment Methodology

7.1 Existing Risk Assessment

A quantitative risk assessment has been undertaken at the site by Coffey Environments – Coffey (2010) *Health and Ecological Risk Assessment*. The risk from hydrocarbons to current human receptors was reviewed within this report and SSTLs were developed for the protection of current human receptors and future receptors should areas be redeveloped. Fate and transport modelling using Bioscreen AT was also used to ensure that groundwater at current concentrations would not affect down-gradient bores and ecological receptors.

7.2 Coffey (2010) Human Risk Assessment

Potential risk to current and future workers and residents as reported in Coffey (2010) is presented in Table 7.2.1. The potential risk was modelled using maximum on- and off-site concentrations as of September 2008.

Table 7.2.1: Summary of Hazard Index and Cancer Risk Assessment (Coffey, 2010)

Receptor	Hazard Index	Cumulative Incremental Risk of Cancer
On-site Receptors		
Slab-on-grade commercial	0.16	2.21×10^{-6}
1m deep sub-surface maintenance trench	0.09	1.23×10^{-6}
Off-site Receptors		
Slab-on-grade commercial (excluding 120 Sugar Road)	0.09	1.23×10^{-6}
1m deep sub-surface maintenance trench (excluding 120 Sugar Road)	2.04	2.26×10^{-5}
1m deep sub-surface maintenance trench (120 Sugar Road)	22.11	5.42×10^{-5}
Slab-on-grade residential (120 Sugar Road)	11.5	1.11×10^{-4}
Slab-on-grade commercial (120 Sugar Road)	0.26	2.97×10^{-6}
Single level basement excavation (construction workers)	79.9	5.5×10^{-6}

Receptor	Hazard Index	Cumulative Incremental Risk of Cancer
Single level residential with basement carpark (passive ventilation)	6.83	5.99×10^{-5}
Single level residential with basement carpark (mechanical ventilation)	0.03	2.63×10^{-7}
Single level residential with basement cellar (passive ventilation)	5.49	1.22×10^{-4}
Single level residential with basement cellar (mechanical ventilation)	0.91	2.03×10^{-5}

Notes: 1. Shaded concentrations exceed threshold / non-threshold targets of 1.0 and 1×10^{-5} respectively.

The risk to site workers and intrusive maintenance workers working within a trench was considered acceptable. Considering concentrations at the site have decreased significantly since this date it is inferred that the current risk on-site will also be acceptable. No further assessment of risk to site workers has therefore been undertaken.

The risk to off-site commercial receptors and residents living in a single level residential building with a basement carpark that has mechanical ventilation was also reported to be acceptable. The risk to all other receptors exceeded either the hazard index and / or cumulative risk of cancer targets and was considered unacceptable.

7.3 Existing Site Specific Target Levels

The Coffey (2010) report including the SSTLs has been endorsed by the Third Party Reviewer. OTEK has accepted the findings from the Coffey (2010) risk assessment that used the maximum concentrations of COPC from September 2008 and therefore it is not considered necessary to re-evaluate the results for receptors where HI and ILCR were below their respective values of 1.0 and 1.0×10^{-5} .

SSTLs were developed by Coffey (2010) for receptors that exceeded hazard index and cancer risk targets are shown in Table 7.4.1. The SSTLs developed by Coffey (2010) were based on groundwater data collected and modelled without consideration of groundwater remediation. As MPE was commenced in both on-and off-site settings in October 2009, the SSTLs derived by Coffey (2010) are no longer considered valid.

Table 7.4.1: Existing Site Specific Target Levels (Coffey, 2010)

Analyte	Most Conservative Coffey (2010) SSTL (at-receptor target)
Benzene	1.0
Toluene	54
Ethylbenzene	>SOL
Xylene	>SOL
Naphthalene	0.97
1,2-DCA	442
TPH C6-C9 Aliphatic	>SOL
TPH C10-C14 Aromatic	1.3
TPH C10-C14 Aliphatic	>SOL

7.4 Approach to Modifying Risk-based SSTLs

Since May 2010, when the Coffey (2010) report was endorsed by the Third Party Reviewer, Health Screening Levels (HSLs) for petroleum hydrocarbons have been released and endorsed by environment agencies throughout Australia for incorporation into the revised National Environment Protection Measure (NEPM). The HSLs were developed using a target hazard quotient of 1.0 for each individual chemical but did not incorporate the potential for additive or synergistic effects, as was done by Coffey (2010).

7.5 Screening Criteria

The results from the June 2011 GME have been used as the basis for assessment of risks to off-site receptors. The results have been screened using the HSL values provided in Friebel and Naderbaum (2011), which have been developed as Tier 1 screening values. As the elevation of the water table measured in off-site wells with maximum reported COPC (MW13 and MW18) were < 2m, the HSLs for groundwater are not able to be applied. Therefore, HI and ILCR risks have been assessed through the tiered risk assessment process specified by enHealth (2004).

7.6 Hazard Identification

The results from the June GME reported the following COPC in off-site monitoring wells.

- BTEX;

- TPH C6-C9, C10-C14, C15-C28; C29-C36; and
- Naphthalene.

The maximum reported concentrations of each of the COPC, provided in Table 5.1.2 and aliphatic/aromatic speciation data provided in Table 5.1.3 have been taken forward to assess the potential risks to receptors specified in Section 7.7. As hydrocarbons >EC16 are not considered to be volatile, this fraction will be assessed by dermal contact pathway only. As such the following COPC have been taken forward to the Tier 2 assessment:

- Benzene, toluene, ethylbenzene, Xylenes (total);
- TPH C6-C9 (aliphatic);
- TPH C10-C14 aliphatic and aromatic; and
- Naphthalene.

7.7 Toxicological Profiles

The selection of toxicity values adopted in this HHRA follows guidance from ANZECC/NHMRC (1992), which is in accordance with NEPC (1999) policy. The sources of toxicological data used in the risk assessment process have been selected following the priority rankings detailed by Enhealth (2004). Potential threshold effects are characterised by comparing the estimated chemical intake to the ADI or equivalent toxicity value that represents the threshold intake for adverse health effects by the specific route of exposure.

Potential non-threshold (carcinogenic) effects are the estimated incremental probabilities that an individual will develop cancer over a lifetime as a result of the estimated exposure to the COPC. When a Cancer Slope Factor (CSF) is used to evaluate health risk, it is assumed that any exposure to the chemical will, in theory, result in an increased risk or probability of developing cancer. The higher the CSF, the more potent the COPC and the greater the calculated cancer risk for a given exposure. Toxicity values adopted for the risk assessment are presented in Table 7.7.1 with toxicological profiles for Tier 2 COPC presented in Table 7.7.2.

Table 7.7.1: Toxicity Values for COPC

Analyte	Inhalation Toxicity Value	Oral / Dermal Toxicity Value
Benzene	Unit Risk $6 \times 10^{-6} (\mu\text{g}/\text{m}^3)^{-1}$ (WHO 2000) Non-threshold CSF = $0.021 (\text{mg}/\text{kg}/\text{d})^{-1}$ Threshold RfC = $0.03 \text{ mg}/\text{m}^3$ (US EPA IRIS)	Non-threshold CSF = $0.035 (\text{mg}/\text{kg}/\text{d})^{-1}$ (WHO 2004) RfD = $0.004 \text{ mg}/\text{kg}.\text{day}$
TPH C ₆ -C ₁₀ Aliphatic	RfC = $18.4 \text{ mg}/\text{m}^3$ (TPHCWG 1997, SAHC 1998, for n-hexane), ADI = $5.26 \text{ mg}/\text{kg}.\text{day}$	ADI = $5.0 \text{ mg}/\text{kg}.\text{day}$ (TPHCWG 1997)
TPH >C ₁₀ -C ₁₂ Aliphatic	RfC = $1.0 \text{ mg}/\text{m}^3$ (USEPA IRIS), ADI = $0.29 \text{ mg}/\text{kg}.\text{day}$	ADI = $0.1 \text{ mg}/\text{kg}.\text{day}$ (TPHCWG 1997)
TPH >C ₁₀ -C ₁₂ Aromatic	RfC = $0.2 \text{ mg}/\text{m}^3$ (TPHCWG 1997, a mixture of C ₉ -C ₁₆ aromatic compounds including naphthalene), ADI = $0.057 \text{ mg}/\text{kg}.\text{day}$	ADI = $0.04 \text{ mg}/\text{kg}.\text{day}$ (TPHCWG 1997)

Table 7.7.2: Toxicological Profiles for Tier 2 Chemicals of Concern

Chemical	Toxicological Profile
Benzene	<p>Toxicokinetics: The primary route of benzene exposure is via inhalation, with between 30% and 50% of inhaled benzene absorbed by the lungs. The majority of ingested benzene is absorbed whereas only a small proportion of benzene is dermally absorbed (< 1%), with the remainder volatilising (WHO, 1993).</p> <p>Non-cancer Health Effects: Acute Effects - asphyxiation, respiratory arrest, central nervous system depression, drowsiness, dizziness, headaches, skin and eye irritation. Chronic Effects - hematotoxicity (toxicity to the blood) and reproductive abnormalities (ATSDR, 1997).</p> <p>Carcinogenicity: Benzene is classified benzene as a Group 1 known human carcinogen. This classification is based upon sufficient evidence in both human and animal studies (IARC, 2000).</p>
TRH C6-C16	<p>Toxicokinetics: As the petroleum products that the largest numbers of people are likely to be exposed to are highly volatile, inhalation is the primary route of exposure. Ingestion and dermal absorption of TPH via contact with fuel, and contaminated soil and groundwater are also possible routes of exposure. Little information is available regarding the toxicokinetics of TPH mixtures with the majority of studies focusing on individual aromatic TPH components, including BTEX and PAH compounds. Absorption of aliphatic TPH fractions decreases with increasing weight (ATSDR, 1999). In the absence of evidence to the contrary 100% bioavailability via ingestion and inhalation has been assumed.</p> <p>Non-cancer Health Effects: Acute Effects - Generally, the body system most affected by TPH compounds is the central nervous system; other body systems affected include the blood, immune system, lungs, skin and eyes. Effects of TPH compounds include dizziness, headaches, reproduction impairment, skin disorders and irritation of the throat and stomach (ATSDR, 1999). Chronic Effects - CNS depression, skin/eye irritation, renal & hepatic effects, anaemia, neurological and respiratory effects, reproductive effects, skin and eye irritation (TPHCWG, 1997)</p>
Naphthalene	<p>Toxicokinetics: Exposure to naphthalene typically occurs through inhalation route. Naphthalene is readily absorbed through the gastrointestinal tract, lungs and skin (ATSDR, 1997)</p> <p>Non-cancer Health Effects: Acute Effects - headaches, nausea, anaemia, convulsion, coma and eye irritation. Chronic Effects - cataracts, retinal haemorrhage, lung and nasal inflammation, (ATSDR, 2005)</p>
<p>World Health Organization (WHO) (1993) <i>Environmental Health Criteria No 150 Benzene</i>. International Programme of Chemical Safety, World Health Organisation, Geneva.</p> <p>Agency for Toxic Substances and Disease Registry (ATSDR) (1997) <i>Toxicological Profile for Benzene</i>. United States Department of Health and Human Services, Atlanta, Georgia, USA</p> <p>International Agency for Research on Cancer (IARC) (2000) <i>IARC Monographs on the Evaluation of Carcinogenic Risks to Humans: Some Industrial Chemicals</i>. World Health Organisation, International Agency for Research on Cancer 77, Lyons.</p> <p>Agency for Toxic Substances and Disease Registry (ATSDR) (1999) <i>Toxicological Profile for Total Petroleum Hydrocarbons</i>. US Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, Atlanta (Georgia), USA.</p> <p>TPHCWG (Total Petroleum Hydrocarbon Criteria Working Group Series) (July 1997) Volume 3 - <i>Selection of Representative TPH Fractions Based on Fate and Transport Considerations</i>.</p>	

7.8 Receptors

The receptors considered in the risk assessment concerning potential future development of the off-site properties currently occupied by Pacific Ford and Stegbar, are:

- Residents (child, adult) in a slab on grade building and a building with basement car park/workshop; and
- Workers undertaking shallow (< 1m deep) excavations.

7.8.1 Future Residents

Residents, including adults (16-70 years), youths (aged 6-15 years) and younger children (0-5 years) are assumed to live on-site following a change of land zoning in the future scenario. Assuming a Reasonable Maximum Exposure (RME) scenario, residents are assumed to occupy the premises 365 days per year, living 20 hours indoors per day (EnHealth 2004).

Residents are unlikely to come into contact with subsurface contaminated groundwater during normal daily activities. Exposure via inhalation of petroleum vapours in indoor and outdoor air has been assessed. Exposure to bore water has not been considered due to the high EC and low yield of the aquifer and therefore lack of a beneficial use.

7.8.2 Maintenance (Trench) Workers

Excavation workers may conduct excavations on the off-site properties, such as the installation or maintenance of existing services. These work programs are unlikely to be frequent or prolonged. As groundwater is approximately 1.5-2.3 mbgl, these workers may come into direct contact with groundwater but may be exposed through inhalation of vapours within a trench.

On-site and environmental receptors have been assessed previously by Coffey (2010), who determined that no significant risk existed for on-site commercial, off-site commercial workers or those conducting excavations on-site. The HI and cancer risks were calculated using much greater concentrations than currently exist and therefore have not been considered further.

7.9 Source-Pathway-Receptor (SPR) Linkages

The receptors identified in Coffey (2010) in the off-site setting for which HI and/or ILCR were found to be unacceptable are as follows:

- 1m deep sub-surface maintenance trench (120 Sugar Road);
- Slab-on-grade residential (120 Sugar Road);
- Single level basement excavation (construction workers);
- Single level residential with basement carpark/workshop; and
- Single level residential with seepage into basement cellar and vapours to first floor.

The main pathway considered for the identified receptors is inhalation of hydrocarbon vapours derived from impacted groundwater. As a potential residential development of the site may also include a basement carpark or cellar, which would extend to a depth below the water table, seepage of groundwater into this has also been assessed. The SPR assessed in this revised HERA are shown in Table 7.9.1.

Table 7.9.1: Source-Pathway-Receptor (SPR) Linkages

Source	Pathway	Off-site residential	Off-site excavation (1m)	Justification
Dissolved phase (BTEX, TPH C ₆ -C ₉ , C ₁₀ -C ₁₄ , naphthalene)	Inhalation of vapours (indoors)	✓	X	It is plausible that vapours from groundwater may enter a residential development
	Inhalation of vapours (outdoors)	✓	✓	It is plausible that vapours may build up in a trench
	Inhalation of vapours (indoor)	✓	X	It is possible that a future residential development includes a cellar or basement carpark/work workshop
	Incidental dermal contact/ingestion	X	X	Based on the recharge rate, water quality parameters, aesthetic values and existing reticulated water supply, it unlikely that groundwater would be extracted for use

There is a possibility for the residential scenario that groundwater may be extracted for use. This is considered unlikely for the following reasons:

- As the properties (Pacific Ford and Stegbar) are currently supplied by reticulated water it is considered unlikely that groundwater would be extracted for potable use; Based on the Queensland Department of Mines (1986), Groundwater Resources of Queensland, Mines Department Series: Map 4 (1:2,500,000), groundwater in the region is typically of moderate salinity (Total Dissolved Ions 500mg/L – 1500mg/L) and low bore yield (<5L/sec). This water is suitable for most purposes, but marginal for human consumption;
- Recharge in a number of wells on the Pacific Ford and Stegbar sites was extremely slow following purging prior to sampling, indicating that yield from the shallow aquifer would be low; and
- Aesthetic considerations of groundwater quality indicated that groundwater from wells on the Pacific Ford and Stegbar properties are generally cloudy and vary in colour from light grey to dark grey with H₂S odour also been identified in a number of off-site wells on the Pacific Ford and Stegbar properties. As such, it is considered unlikely that groundwater will be used and therefore this pathway is considered incomplete and will not be assessed further.

8 Risk Characterisation

In the quantitative risk characterisation process, the results of the human health exposure assessment and hazard assessment sections have been combined to provide numerical estimates of the potential risks to the identified receptors using maximum reported groundwater concentrations for the COPC exceeding the Tier 1 screening criteria. Risk characterisation was conducted for on-site future residents in a slab on grade building with and without a basement and off-site commercial workers in slab on grade building.

The algorithms used in the derivation of HQ, HI and ILCR values for the on-site and off-site receptors are provided in *Annex A*. The model input data are presented in *Annex B* and the output data is presented in *Annex C*.

8.1 Non-Threshold (Cancer) Risk

Cancer risk (non-threshold risk) is based on an incremental lifetime cancer risk associated with site contamination. Risks associated with carcinogenic contaminants have been characterised by an Increased Lifetime Risk of Cancer (ILCR). For this assessment, an acceptable level of risk is defined as a risk of less than 1×10^{-5} for all receptors in the current risk assessment. This value has been adopted by most regulatory agencies across Australia except WA, which applies a value of 1.0×10^{-6} .

8.2 Threshold (Non-Cancer) Risk

Threshold risks can be assessed by direct comparison of an Exposure Concentration (EC) in air with a Reference Concentration (RfC) or Chronic Daily Intake (CDI) with the Acceptable Daily Intake (ADI). For assessment of inhalation of vapours (comprising inhalation of vapours in indoor and outdoor air and inhalation of dust particles) NEPM (2011) recommends quantifying intakes or exposures via inhalation on the basis of an intake (US EPA 1989) or an exposure concentration (US EPA 2009).

Risks associated with non-carcinogenic (threshold) contaminants have been characterised by Hazard Quotients (HQs) and the HQs for multiple exposure pathways and a combination of chemicals have been summed to calculate an overall risk level, or Hazard Index (HI). When a HI is above 1.0, it does not imply that risks are unacceptable but rather further assessment is required to refine the risk, including further site specific data and refinement of input parameters.

8.2.1 Residential: Slab on Grade

The results from the assessment of risks for potential future residents in a slab on grade building for the indoor and outdoor scenarios are presented in Table 8.2.1.

Table 8.2.1: Hazard Index for Residents – Slab on Grade

COPC	HQ (Indoor)	HQ (Outdoor)
Benzene	1.8E-01	2.4E-05
Toluene	2.7E-02	3.4E-06
Ethylbenzene	5.8E-05	7.4E-09
Xylenes	3.6E-02	4.6E-06
Naphthalene	7.5E-02	1.2E-05
TRH C6-C9 (- BTEX)	4.6E-02	5.9E-06
TRH >C10-C14 (aliphatic)	7.0E-01	8.5E-05
TRH >C10-C14 (Aromatic)	6.3E-02	8.4E-06
Sum HQ	1.1E+00	1.5E-04
Hazard Index	1.1E+00	
Hazard Index (HI) value of 1.0 acceptable		

The results for slab on grade determined a HI value of 1.1E+00, slightly above the acceptable value of 1.0, with the main drivers being TPH C₁₀-C₁₄ (aliphatic), with HQ of 7.0E-01 and benzene, with HQ of 1.8E-01. These two COPC contribute 8.8E-01 to the overall HI of 1.1E+00. Although the individual COPC do not exceed the HI of 1.0, the cumulative HI of 1.1 suggests that there may be a requirement for further reduction in the concentration of COPC, particularly the two risk drivers, in order to ensure that the risks for any future residential use of the site is acceptable.

8.3 Residential: Basement

An assessment of potential risk for future residents was determined for a building with a basement carpark or cellar/workshop and was also determined for seepage of groundwater into the basement. The calculated HI for groundwater seepage also included the assessment of risk to occupants of the residence above the basement for the remainder of the daily exposure setting. The results for these scenarios are presented in Table 8.3.1.

Table 8.3.1: Hazard Index for Basement and Groundwater Seepage

COPC	Basement		
	Indoor	Seepage (Basement)	Seepage (first floor)
Benzene	1.4E-02	7.2E-02	1.4E-01
Toluene	2.0E-03	5.0E-04	1.0E-03
Ethylbenzene	4.4E-06	3.0E-04	7.0E-04
Xylenes	2.7E-03	1.2E-02	2.3E-02
Naphthalene	5.4E-03	2.1E-02	4.8E-01
TRH C6-C9 (- BTEX)	3.5E-03	2.0E-04	5.0E-04
TRH >C10-C14 (aliphatic)	5.3E-02	1.1E-03	2.1E-03
TRH >C10-C14 (Aromatic)	4.7E-03	2.6E-02	5.1E-02
Sum HQ	8.5E-02	1.4E-01	2.7E-01
Hazard Index (HI)	8.5E-02	4.1E-01	
Hazard Index (HI) value of 1.0 acceptable			

The results for the hazard index (HI) shown in Table 8.4.1 indicate that the risk posed to future residents with a basement carpark is not significant, being below the acceptable value of 1.0. The result of HI (4.1E-01) associated with possible groundwater seepage into the basement and subsequent volatilisation of hydrocarbons does not represent a significant risk.

8.4 Shallow Excavations (1m trench)

The potential exists for shallow excavations to be undertaken within the off-site properties (Pacific Ford and Stegbar) as part of any future redevelopment. Therefore risks to workers who may undertake such works has been assessed. The results are presented in Table 8.4.1.

Table 8.4.1: Hazard Index (HI) for Shallow (1m) Trench Excavation Worker

COPC	HQ (Outdoor)
Benzene	1.3E-04
Toluene	1.9E-05
Ethylbenzene	4.1E-08
Xylenes	2.6E-05
Naphthalene	7.2E-05
TRH C6-C9 (- BTEX)	3.2E-05
TRH >C10-C14 (aliphatic)	4.8E-04
TRH >C10-C14 (Aromatic)	7.7E-05
Sum HQ	8.4E-04
Hazard Index (HI)	8.4E-04

The calculated HI indicates that the risk posed to a worker undertaking shallow (1m) excavation is not significant, with a HI of 8.4E-04.

8.5 Increased Lifetime Cancer Risk (ILCR)

The ILCR was determined for benzene, the only non-threshold COPC. The results for each of the scenarios presented above are presented in Table 8.5.1 and Table 8.5.2, respectively whilst the ILCR for a worker excavating a shallow trench is presented in Table 8.5.3.

Table 8.5.1: Increased Lifetime Cancer Risk (ILCR) Future Residents – Slab on Grade

COPC	ILCR Indoor	ILCR Outdoor	ILCR total
Benzene	1.1E-05	1.4E-09	1.1E-05

Table 8.5.2: Increased Lifetime Cancer Risk – Standard Basement and Seepage into Basement

COPC	Basement	Basement Seepage	Seepage (first floor)	Total ILCR (basement + first floor)
Benzene	8.6E-07	5.01E-06	9.77E-06	1.48E-05

Table 8.5.3: ILCR for Worker Excavating Shallow (1m) Trench

COPC	ILCR
Benzene	3.0E-10

The result for the seepage into basement (+ first floor)were both less than $1.0\text{E-}05$ for the individual exposures but the cumulative value of $1.5\text{E-}05$ was above the acceptable value of $1.0\text{E-}05$, indicating that the seepage and volatilisation of hydrocarbons into the basement may represent an unacceptable increased cancer risk. As such, there is a requirement to derive SSTLs, based on the results for hazard index for slab on grade (indoors), basement and seepage into the basement in order to ensure protection of human health.

The calculated ILCR for worker in a shallow trench of $3.0\text{E-}10$ indicates that the risk is not significant.

8.6 Site Specific Target Levels (SSTLs)

Based on the results from the assessment of HI and ILCR, there is a potential for an unacceptable risk to exist for a future residential use of the Pacific Ford and Stegbar sites. Therefore, there is a requirement to develop SSTLs in order to remediate the sites to an unrestricted land use ie: HSL-A resident with garden. The results from the HI and ILCR indicated that the scenario exhibiting the highest results was for basement scenario, with TPH C₁₀₋₁₄ (aliphatic) and benzene being identified as the main risk drivers. Therefore SSTLs have been derived for these chemicals of concern. The SSTLs for these COPC, and the remaining COPC, are presented in Table 8.7.1.

Table 8.6.1: SSTLs for Off-Site (Pacific Ford and Stegbar) Sites

COPC	Current Groundwater Concentrations (June 2011) mg/L	Derived SSTLs (mg/L)
Benzene	0.644	0.43
Toluene	0.842	20
Ethylbenzene	0.160	1730
Xylenes	3.53	63
Naphthalene	0.073	0.66
TPH C6-C9 (-BTEX)	1.11	15
TPH C10-C14 aliphatic	0.38	0.35
TPH C10-C14 aromatic	1.72	18
Hazard Index (HI)	1.1E+00	1.0E+00
ILCR	1.5E-05	9.9E-06

8.7 Coffey (2010) Ecological Risk Assessment

The Coffey (2010) report indicated that at 2008 concentrations, which were significantly higher than current concentrations, the plume was predicted to not reach nearby ecological receptors. The potential temporal migration of hydrocarbons within groundwater was assessed in the Coffey (2010) report using reportedly calibrated Bioscreen AT models for each individual BTEX. BTEX were chosen as representative chemicals of the plume due to their increased mobility compared to heavier hydrocarbons. A conservative estimate of the distance all BTEX within the plume will migrate will therefore be represented by these models.

It was concluded in the Coffey (2010) report that based on the maximum plume migration distance the plume would not migrate to the closest ecological receptors; namely a lagoon located approximately 500m from the site. Based on this interpretation and considering the Third Party Reviewer has endorsed the Coffey (2010) report, no further assessment of migration of the plume to ecological receptors was undertaken.

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9 Conclusions

OTEK has assessed the on- and off-site risks to humans and the environment from exposure to hydrocarbon impacted groundwater originating from the site and revised existing SSTLs so they are suitable as on-site remediation end-points. The site is currently listed on the Department Of Environment and Resource Management (DERM), Contaminated Land Register (CLR). In addition, the neighbouring properties to the north (Stegbar on Lot 7 on Plan RP848505) and to the west (Pacific Ford Lot 2 on Plan RP176929) are listed on the DERM Environmental Management Register (EMR).

The potential threshold and non-threshold risks, as presented in Coffey (2010), were reviewed. The report indicated that at September 2008 groundwater concentrations at the site, which were significantly higher than present levels, did not pose a potentially unacceptable risk to on- and off-site site workers or intrusive maintenance trench workers. This conclusion was inferred to be the same for the current on-site scenario. As the site did not present an unacceptable risk to site workers or on-site intrusive maintenance trench workers the site was considered suitable for continued petroleum use based on the following assumptions:

- The site will continue to be used as a service station;
- No changes are made to the layout and configuration of the existing site infrastructure (buildings, canopy etc.);
- The integrity of the concrete surface is maintained during operation of the site as a service station;
- Standard service station operating protocols are maintained; and
- Appropriate health and safety procedures (including PPE) are implemented during intrusive works at the site, including excavation of pits and trenches, and include the use of vapour monitoring during works.

For receptors where an unacceptable risk was identified by Coffey (2010), ie; potential future residents (living in houses with and without basements), off-site workers (if the off-site areas were redeveloped with basements), and construction workers, a re-evaluation was undertaken using recent (June 2011) groundwater analytical data. Otek installed a multi-phase extraction (MPE) system in October 2009 and as such, the conclusions drawn by Coffey (2010) were considered to be invalidated as conditions had changed.

A re-evaluation and calculation of Hazard Index (HI) and increased lifetime cancer risk (ILCR) were determined for a residential development on the Pacific Ford and Stegbar properties with the goal of determining SSTLs to enable the sites to be removed from the Environmental Management Register (EMR). The assessment considered a residential property as slab on grade and with a basement, as well as for worker undertaking excavation of shallow (1m) trench. The main exposure pathway for these setting was inhalation of hydrocarbon vapours derived from groundwater. As well, seepage into a basement with subsequent inhalation of vapours within the basement and overlying residence was also determined.

The results from the assessment indicated that a potentially unacceptable risk may exist for slab on grade residents as the HI of 1.1 was marginally above the acceptable value of 1.0. The result for the basement scenario incorporating seepage and exposure in the first floor was below the acceptable HI but marginally above the acceptable ILCR, with a result of 1.5E-05. The re-calculated SSTLs, based on the HI and ILCR results are shown in table below:

Table 9.1: Re-calculated SSTLs, based on the HI and ILCR results

COPC	Current Concentration (mg/L)	SSTL (mg/L)
Benzene	0.644	0.43
Toluene	0.842	20
Ethylbenzene	0.160	1730
Xylenes	3.53	63
Naphthalene	0.073	0.66
TPH C6-C9 (-BTX)	1.11	15
TPH C10-C14 aliphatic	0.38	0.35
TPH C10-C14 aromatic	1.72	18

The concentrations of all other COPC (toluene, ethylbenzene, xylenes, naphthalene, TPH C₆-C₉ and TPH C₁₀-C₁₄ aromatic) did not significantly influence the HI values and as such there was no requirement to re-evaluate their concentrations from those used in the assessment. This is shown in the calculated SSTLs for each of these chemicals

Fate and transport modelling indicated the hydrocarbon plume, as of September 2008, would not migrate beyond 100m from the site and would therefore not reach ecological receptors located approximately 500m from the site. The conclusion was also deemed suitable for the current scenario.

It is considered that once groundwater concentrations at the site are below the SSTLs presented in the table above, the site will be suitable for transferal from the DERM CLR to the DERM EMR and the off-site areas will be suitable for removal from the EMR.

10 Limitations

- (a) The conclusions presented in this report are relevant to the conditions of the site and the state of legislation currently enacted as at the date of this report. We do not make any representation or warranty that the conclusions in this report will be applicable in the future as there may be changes in the condition of the site, applicable legislation or other factors that would affect the conclusions contained in this report.
- (b) OTEK has used a degree of skill and care ordinarily exercised by reputable members of our profession practicing in the same or similar locality. Conclusions are based on representative samples or locations at the site, the intensity of those samples being in accordance with the usual levels of testing carried out for this type of investigation. Due to the inherent variability in natural soils we cannot warrant that the whole overall condition of the site is identical or substantially similar to the representative samples.
- (c) This report has been prepared for Mobil Oil Australia Pty Ltd and for the specific purpose to which it refers.
 - (i) Mobil means:
 - (A) Mobil Oil Australia Pty Ltd ABN 88 004 052 984; or
 - (B) an Affiliate of Mobil.
 - (ii) an Affiliate means:
 - (A) a corporation owned beneficially or otherwise as to 50% of the voting shares by Mobil; or
 - (B) a related body corporate of Mobil or an Affiliate, provided that the term 'related body corporate' has the meaning ascribed in section 50 of the Corporations Act 2001 (Cth).
- (d) This report has been provided by OTEK subject to the limitation in (a) & (b) as stated above, for the benefit of Mobil and:
 - (i) the purchaser from Mobil (but not that purchaser's successor in title) where a site is owned by Mobil; and
 - (ii) the third party owner or assignee from Mobil (as the case may be) but not their respective successors in title where a site is/was leased by Mobil.
- (e) Subject as is otherwise provided this report and the information contained in it is the intellectual property of OTEK.
- (f) Any duly authorised and competent regulating authority or governmental body whether local, state or federal may rely upon the contents of this report subject to limitation in (a) & (b) as stated above for the purpose of reviewing and evaluating its contents.

O'Connor Gary

From: O'Connor Gary
Sent: 30 May 2012 4:35 PM
To: 'Adam Breen'; Cifuentes, Luis /C; Mack Dreyer; Brendan Ebzery; AHunt@kleinfelder.com
Cc: Marc Andrews
Subject: RE: Mobil Sugar Road Maroochydore

Hi all

Thanks for the overview of the works being conducted at the site. To confirm our discussions of the actions and timeframes:

1. Surfactant injection 30/5/12
2. Supply TPR with revised surfactant injection plan - 8/6/2012
3. MPE system operation for 3 months from early June 2012
4. Risk assessment to TPR by 8/6/2012
5. Stegbar validation report - mid Aug 2012
6. 2nd Surfactant injection early Sept 2012
7. MPE system operation for 3 months to end of Dec 2012
8. 1st GME - Jan 2013
9. Check against agreed SSTL early Feb 2013
10. 2nd GME - Mar 2013
11. 3rd GME - June 2013

I also note that Otek are to dip wells for the presence of PSH during the remediation works. If you would please advise me (& the TPR) if any PSH is encountered.

I also noted that Mobil is to respond with its plans for the adjacent former Midas site within 2 weeks.

Regards

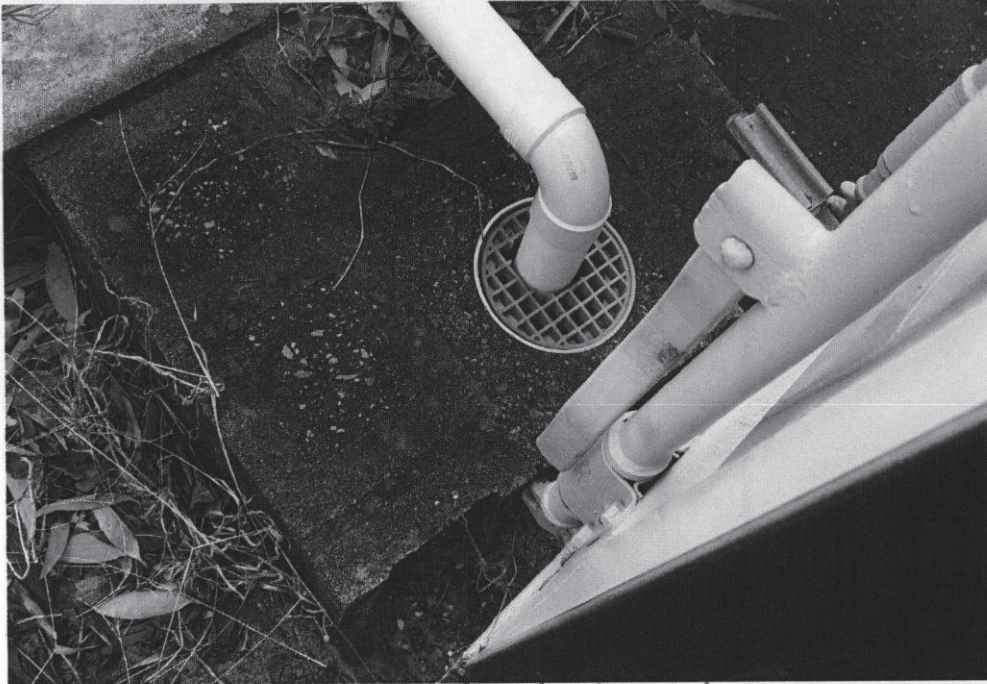
Gary O'Connor
Manager, Project Support
Environmental Performance and Coordination Branch

Telephone: 67 7 3330 5708

Facsimile: 61 7 3330 5754

Mobil 4(6) Personal information

MPE Sewer Discharge



Surfactant Injection



RTI 13-329

BH 41.

GAC



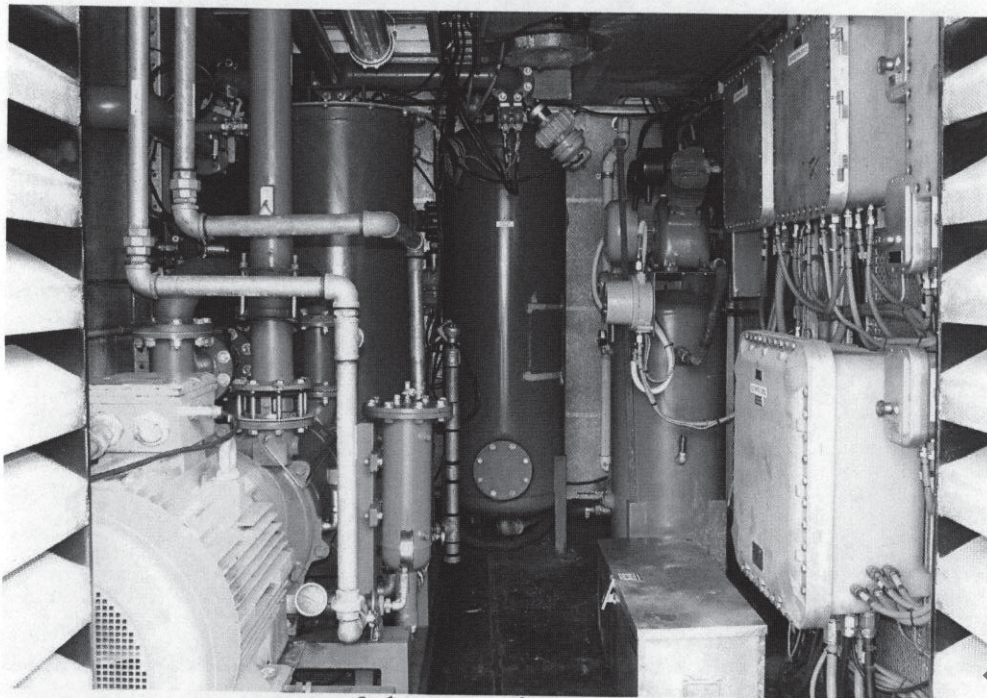
MPE External



File A

Page 299 of 346

Inside MPE container



MPE external.

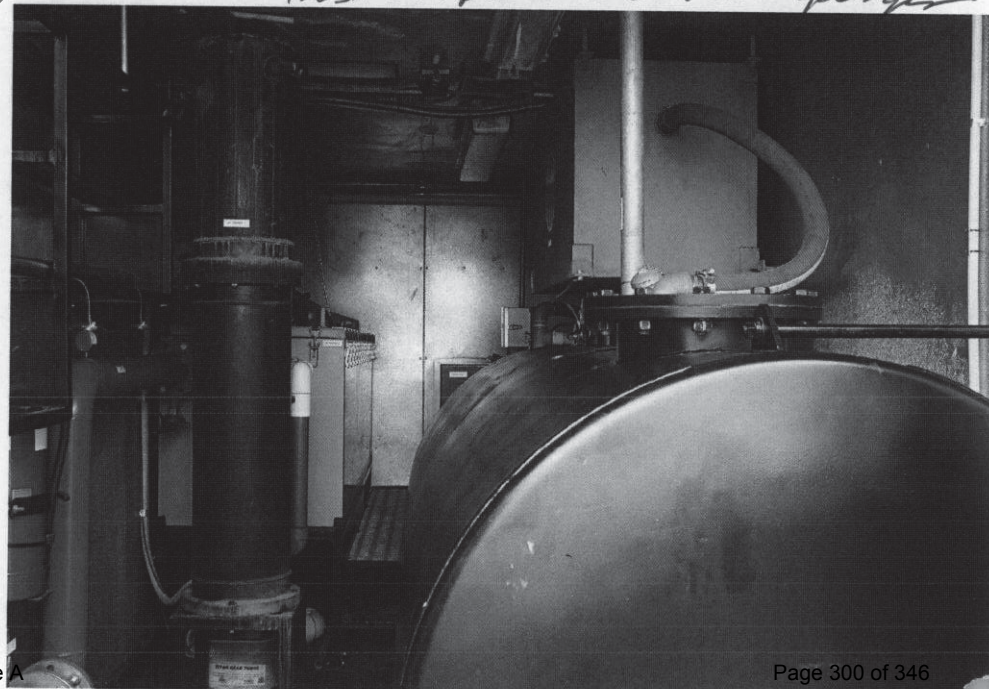


RTI 13-329

MWI



Inside MPE oil & air spongers



File A

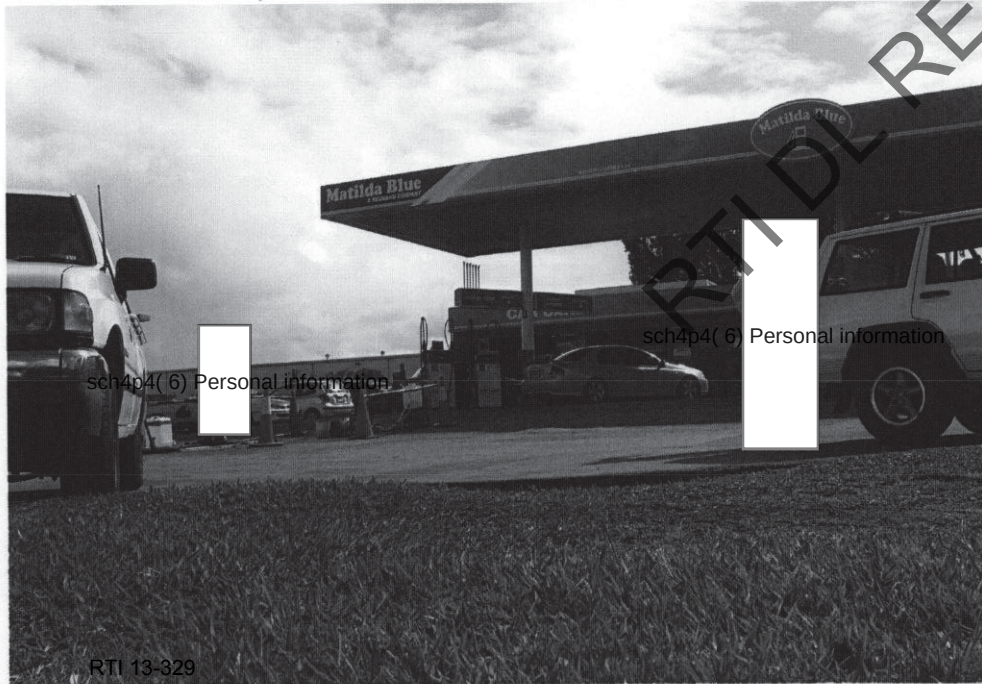
Ground level view from MW4

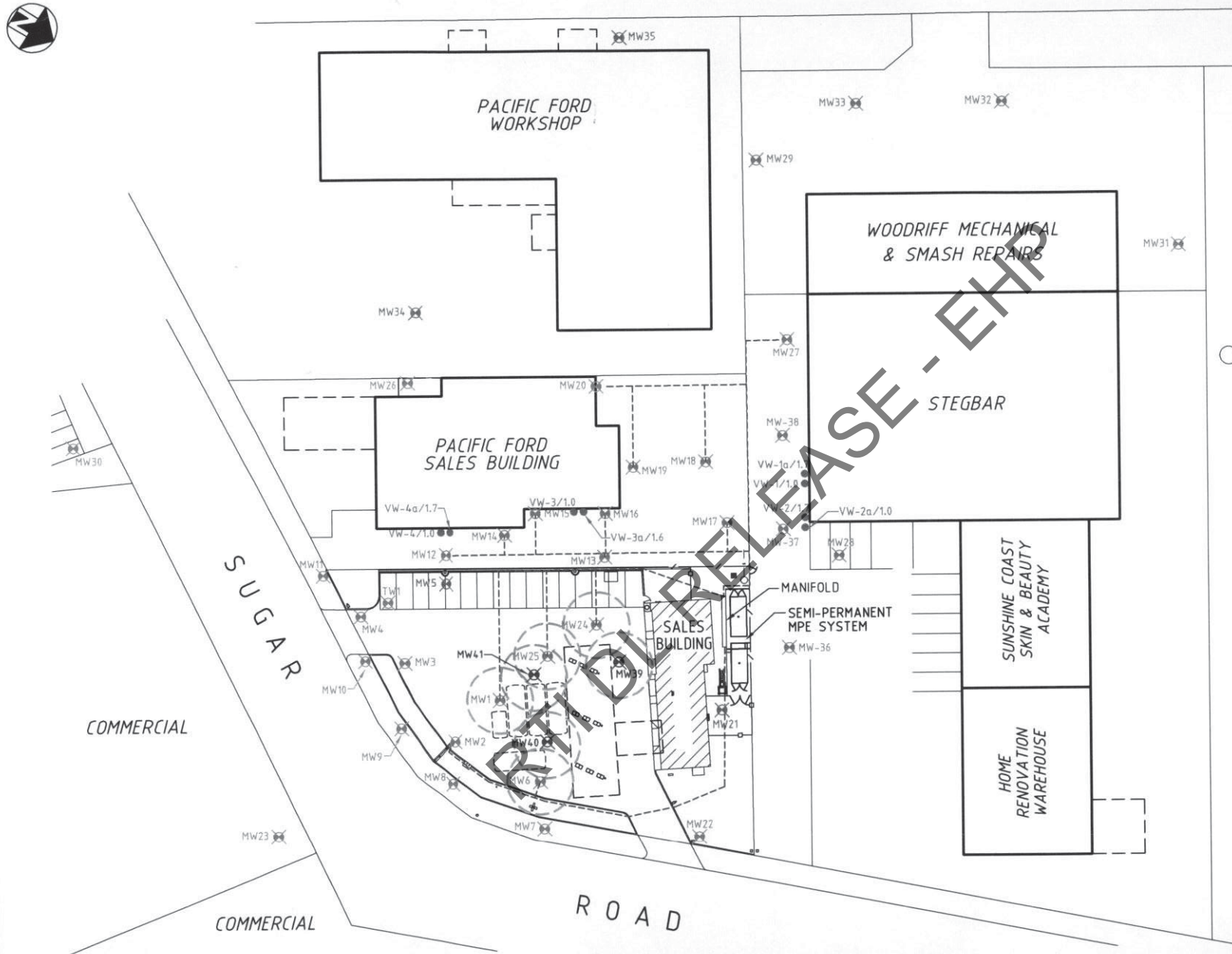


View from MW 22



View from MW8

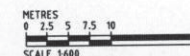




LEGEND

- INDICATES BUILDINGS
- FENCE
- REMEDIATION PIPING LAYOUT
- MW## EXISTING MONITORING WELL
- MW## LOST/DESTROYED MONITORING WELL
- VW-##/## VAPOUR WELL / DEPTH (METRES)
- MW## NEWLY INSTALLED SURFACTANT INJECTION MONITORING WELL
- SURFACTANT INJECTION WELL LOCATIONS & APPROXIMATE RADIUS OF INFLUENCE

NOTE:
EXTRACTION NO LONGER OCCURS
ON MW-12, MW-14, MW-15,
MW-20 & MW-24.



01	27.03.12	ORIGINAL ISSUE	REM	AB
ISSUE	DATE	REVISIONS	DRN	CKD
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TEL (07) 3426 5200
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PERTH
TEL (08) 9227 9000
FAX (08) 9227 9009

ADELAIDE
TEL (08) 8423 4480
FAX (08) 8423 4500

BEIJING
TEL (+86) 10 8840 0302
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LOCATION OF TARGET SURFACTANT INJECTION WELLS
SURFACTANT INJECTION
MOBIL OIL AUSTRALIA, MAROOCHYDORE, QLD

SHEET A3	DRAWN: REM REV: 01	DATE: 27.03.12 DWG NAME: 5212011F01	CHECKED	APPROVED	FIG No: FIGURE 1
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Date	BH No.	SWL mblg	GW level mAHD	PSH (mm)	Benzene	Toluene	Ethyl benzene	Xylene	C6-9	C10-14	C15-28	C29-36	TPH
9/01/2001	MW1	2.05			35,000	43,000	4,700	27,000	155,000	13,000	1,450	<100	169,450
20/11/2001	MW1	2.543			21,000	28,000	2,500	15,000	76,000	9,600	1,750	264	87,614
21/05/2002	MW1	2.059			29,000	34,000	3,800	23,600	100,000	4,600	360	<100	104,960
21/02/2003	MW1				21,000	26,000	1,800	10,800	80,000	7,500	900	<100	88,400
29/04/2004	MW1	2.038	4.215		3,400	3,600	620	3,600	13,000	4,600	600		18,200
11/01/2011	MW1	0.759	5.494		37,500	75,500	4,470	31,400	171,000	465,000	46,400	<100	682,400
1/05/2012	MW1	0.873	5.38		11	2	10	28	30	300	2,030	160	2,520
20/11/2001	MW10	1.97			9	61	15	100	220	80	<100	<100	300
37.397	MW10	2			53	9	<1	<3	90	<20	<100	<100	90
37.673	MW10				23	9	2	11	49	<20	<100	<100	49
38.106	MW10	2	4		<1	<1	<1	<3	640	<20	<100	<100	640
40.554	MW10				<1	3	<1	<3	20	<20	<100	<100	20
20/11/2001	MW11	1.92			<1	<1	<1	<3	<20	<20	<100	<100	<220
21/05/2002	MW11	1.575			<1	<1	<1	<3	<20	<20	<100	<100	<220
21/02/2003	MW11				9	8	3	11	30	<20	<100	<100	30
29/04/2004	MW11	1.673	3.739		<1	<1	<1	<3	<20	<20	<100	<100	<220
11/01/2011	MW11				<1	<1	<1	<3	<20	<20	<100	<100	<220
20/11/2001	MW12	1.83			1	6	<1	18	60	<20	<100	<100	60
21/05/2002	MW12	1.506			<1	<1	<1	<3	<20	<20	<100	<100	<220
21/02/2003	MW12				44	82	8	55	190		<100	<100	190
29/04/2004	MW12	1.352	3.76		28	<1	7	37	240	130	<100	<100	370
11/01/2011	MW12				<50	<50	67	748	2,080	800	270	<100	3,150
20/11/2001	MW13	2.215		365									
21/05/2002	MW13	1.637		72									
21/02/2003	MW13			PSH									
29/04/2004	MW13	1.462	3.646		30,000	57,000	2,800	19,600	110,000	41,000	4,000	900	15,900
11/01/2011	MW13	1.53	3.578		2,110	10,400	3,130	36,000	212,000	93,200	8,530	<500	313,730
1/05/2012	MW13	1.227	3.881		26	6	27	93	300	560	460		1,300
37397	MW14	1.544			20,000	10,000	1,900	9700	46,000	24,000	<100	<100	48,400
37673	MW14				16,000	7,400	1,100	6,100	33,000	18,000	<100	<100	34,800
38106	MW14	1.515	3.728		42,000	17,000	1,600	9,400	73,000	22,000	400	100	75,700
40554	MW14				1	<2		5	100	290	180	50	620
21/05/2002	MW15	1.617			21,000	3,300	1,600	8,600	27,000	1,400	<100	<100	28,400
21/02/2003	MW15				19,000	4,800	1,100	5,800	32,000	1,700	<100	<100	33,700
29/04/2004	MW15	1.619	3.735		23,000	540	1,100	5,400	31,000	1,800	300	<100	33,100
11/01/2011	MW15				6	<2	30	153	350	510	490	140	1,490
21/05/2002	MW16	1.592			11,000	9,100	910	4,800	29,000	1,100	<100	<100	30,100
21/02/2003	MW16				3,900	2,500	220	1,090	8,300	150	<100	<100	8,450
29/04/2004	MW16	1.495	3.63		8,700	4,000	430	1,690	17,000	1,200	400	<100	18,600
11/01/2011	MW16				2,580	1,040	1,360	10,120	33,600	45,600	8,850	790	88,840
21/05/2002	MW17	1.504			2,800	2,700	200	1,200	7,500	280	<100	<100	7,780
21/02/2003	MW17			PSH									
29/04/2004	MW17	1.305	3.563		19,000	9,900	1,200	4,700	36,000	2,000	3,000	200	41,200
11/01/2011	MW17				NR	NR	NR	NR	NR	NR	NR	NR	NR
21/05/2002	MW18	1.413			8,300	2,400	560	2,670	16,000	1,100	<100	<100	17,100
21/02/2003	MW18				6,000	1,600	320	1,190	9,800	1,100	<100	450	11,350
29/04/2004	MW18	1.438	3.506		16,000	7,200	1,100	4,700	32,000	6,500	4,800	100	43,400
11/01/2011	MW18				2,390	740	274	1,600	8,030	650	550	280	9,510
1/05/2012	MW18	0.873	3.071		984	356	162	1,121	840	1,920	160		3,920
21/05/2002	MW19	1.687			9,600	3,000	890	4,200	19,000	1,500	<100	<100	20,500
21/02/2003	MW19				12,000	8,600	1,400	7,500	31,000	2,400			33,400
29/04/2004	MW19	1.406	3.538		14,000	7,900	1,300	6,700	32,000	3,300	200	<100	35,500
11/01/2011	MW19												
9/01/2001	MW2	1.65		35									
20/11/2001	MW2	1.742		375									
21/05/2002	MW2	1.667			59,000	80,000	8,100	53,000	217,000	25,000	2,260	118	244,378
21/02/2003	MW2				36,000	42,000	36,000	22,700	110,000	37,000	2,200	630	149,830
29/04/2004	MW2	1.787	4.298		53,000	58,000	5,000	23,800	140,000	28,000	2,200	600	170,800
11/01/2011	MW2	0.844	5.241		3,440	2,500	1,480	4,630	14,500	5,480	1,130	70	21,180
1/05/2012	MW2	0.973	5.112		277	371	245	1,093	1,070	310	110		1,490
21/05/2002	MW20	1.729			920	<10	47	200	1,300	70	<100	<100	<220
21/02/2003	MW20				160	240	180	890	2,400	1,600			4,000
29/04/2004	MW20	1.783	3.399		170	3	6	46	320	150	<100	<100	470
11/01/2011	MW20				<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
21/05/2002	MW21	0.778			<1	<1	<1	<3	<20	<20	<100	<100	<220
21/02/2003	MW21				<1	<1	<1	<3	<20	<20	<100	<100	<220
29/04/2004	MW21				NR	NR	NR	NR	NR	NR	NR	NR	NR
11/01/2011	MW21				NR	NR	NR	NR	NR	NR	NR	NR	NR
21/05/2002	MW22	0.971			<1	<1	<1	<3	<20	<20	<100	<100	<220
21/02/2003	MW22				6	5	2	7	20	<20	<100	<100	20
29/04/2004	MW22	1.615	6.5		<1	<1	<1	<3	<20	<20	<100	<100	<220
11/01/2011	MW22				<LOR	210	<LOR	<LOR	1,810	60	340	240	2,450
21/05/2002	MW23	1.676			<1	<1	<1	<3	<20	<20	<100	<100	<220
21/02/2003	MW23				<1	<1	<1	<3	<20	<20	<100	<100	<220
29/04/2004	MW23				NR	NR	NR	NR	NR	NR	NR	NR	NR
11/01/2011	MW23				NR	NR	NR	NR	NR	NR	NR	NR	NR
21/02/2003	MW24				480	370	68	590	1,700	810	<100	<100	2,510

29/04/2004	MW24	2.69	4.053		700	<1	<1	<3	700	360	300	<100	1,360
11/01/2011	MW24	0.834	5.909		Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1/05/2012	MW24	1.536	5.207		548	240	138	5,016	2,310	900	210		3,420
21/02/2003	MW25				31,000	57,000	6,100	37,000	150,000	17,000	1,700	720	169,420
29/04/2004	MW25	2.664	4.063		11,000	25,000	1,800	11,400	50,000	15,000	1,400	200	66,600
11/01/2011	MW25	2.109	4.618		143	145	14	180	720	12,100	1,090	100	14,010
1/05/2012	MW25	1.845	4.882		1,280	8	206	1,271	1,020	2,540	960		4,520
21/02/2003	MW26				500	<1	26	98	650	110	<100	<100	760
29/04/2004	MW26	1.84	3.522		150	270	260	1,130	1,800	1,300	200	<100	3,300
11/01/2011	MW26				2	<LOR	<LOR	<LOR	20	<LOR	<LOR	<LOR	20
21/02/2003	MW27				29,000	28,000	2,100	11,700	71,000	4,100	<100	<100	75,100
29/04/2004	MW27	1.994	3.236		38,000	30,000	2,500	13,400	83,000	4,300	300	<100	87,600
11/01/2011	MW27				526	<LOR	29	133	1,000	220	280	80	1,580
21/02/2003	MW28				<1	<1	<1	<3	<20	<20	<100	<100	<220
29/04/2004	MW28	1.545	3.729		<1	<1	<1	<3	<20	<20	<100	<100	<220
11/01/2011	MW28				<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
21/02/2003	MW29				<1	<1	<1	<3	<20	<20	<100	<100	<220
29/04/2004	MW29	1.92	3.14		<1	<1	<1	<3	<20	<20	<100	<100	<220
11/01/2011	MW29				<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	620	110	730
9/01/2001	MW3	1.65			1,600	390	37	210	2,900	140	<100	<100	3,040
20/11/2001	MW3	1.943			860	140	32	100	1,300	40	<100	<100	1,340
21/05/2002	MW3	1.672			370	89	22	84	660	140	<100	<100	800
21/02/2003	MW3				3,100	1,100	140	760	5,600	190	190	<100	5,790
29/04/2004	MW3	1.773	3.966		580	<1	62	110	740	490	<100	<100	1,230
11/01/2011	MW3				1,110		455	1,573	4,140	1,800	550	70	6,560
21/02/2003	MW30				<1	<1	<1	<3	<20	<20	<100	<100	<220
29/04/2004	MW30	1.99	3.791		<1	<1	<1	<3	<20	<20	<100	<100	<220
11/01/2011	MW30				<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	220	120	340
9/01/2001	MW4	1.65			9	6	<1	4	120	<20	<100	<100	120
20/11/2001	MW4	2.012			3	2	<1	<3	90	<20	<100	<100	90
21/05/2002	MW4	1.677			3	<1	<1		50	50	<100	<100	100
21/02/2003	MW4				3	2	<1	<3	<20	<20	<100	<100	<220
29/04/2004	MW4	1.785	4.033		<1	<1	<1		<20	<20	<100	<100	<220
11/01/2011	MW4				56	<LOR	133	920	2,670	1,460	490	140	4,760
9/01/2001	MW5	2.1			1,000	420	130	670	3,100	260	<100	<100	3,360
20/11/2001	MW5	2.235			9	38	130	600	10,000	360	<100	<100	10,360
21/05/2002	MW5	2.146			2,000	240	150	660	3,400	70	<100	<100	3,470
21/02/2003	MW5				1,500	280	61	347	2,200	160	<100	<100	2,360
29/04/2004	MW5				NR	NR	NR	NR	NR	NR	NR	NR	NR
11/01/2011	MW5				NR	NR	NR	NR	NR	NR	NR	NR	NR
9/01/2001	MW6	1.67		10									
20/11/2001	MW6	1.852		366									
21/05/2002	MW6	1.457			35,000	31,000	4,900	39,000	138,000	69,000	13,300	368	220,668
21/02/2003	MW6				16,000	21,000	2,000	16,600	59,000	32,000	5,400	1,100	975,000
29/04/2004	MW6	1.665	5.061		20,000	30,000	1,800	27,900	79,000	18,000	700	<100	97,700
11/01/2011	MW6				408	1,140	296	1,500	6,380	7,800	1,520	100	15,800
1/05/2012	MW6	0.924	5.802		3		5	5		30	110		140
20/11/2001	MW7	1.768			<0.5	<1	<1	<3	<20	<20	<100	<100	<240
21/05/2002	MW7	1.243			<1	<1	<1	<3	<20	<20	<100	<100	<220
21/02/2003	MW7				<1	<1	<1	<3	<20	<20	<100	<100	<220
29/04/2004	MW7	1.523	4.856		<1	<1	<1	<3	<20	<20	<100	<100	<220
11/01/2011	MW7				<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR
20/11/2001	MW8	1.634			340	42	77	210	820	280	<100	<100	1,100
21/05/2002	MW8	1.196			4,600	510	810	2,410	9,300	1,300	<100	<100	10,600
21/02/2003	MW8				3,200	1,300	340	1,600	8,200	1,200	<100	<100	9,400
29/04/2004	MW8	1.22	4.859		48,000	35,000	2,300	12,200	98,000	6,100	400	<LOR	104,500
11/01/2011	MW8				6,050	5,360	870	4,370	18,400	2,420	290	<LOR	21,110
20/11/2001	MW9	1.973			25	38	8	53	180	40	<100	<100	220
21/05/2002	MW9	1.591			290	1	5	26	420	<20	<100	<100	420
21/02/2003	MW9				820	160	37	121	2,600	<20	<100	<100	2,600
29/04/2004	MW9	1.7	4.192		27	8	1	10	50	<20	<100	<100	50
11/01/2011	MW9				<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR	<LOR

**TABLE 1
CURRENT AND HISTORICAL
GROUNDWATER ELEVATIONS
NEUMANN SERVICE STATION**

116-118 SUGAR ROAD, MAROOCHYDORE, QUEENSLAND



Well ID	Date	Depth to PSH (m)	PSH Thickness (Ht) (m)	Depth to Water (WTm) (m)	Corrected DtoW (WTc) (m)	Elevation TOC (mAHD)	GW Elevation (mAHD)
MW-1	1/05/2012	-	-	0.873	0.873	6.253	5.380
	27/06/2011	Unable to take DTW measurement (rainwater entered to the well from below).					
	19/01/2011	-	-	0.759	0.759	6.253	5.494
	5/01/2011	-	-	0.385	0.385	6.253	5.868
	18/11/2010	-	-	1.732	1.732	6.253	4.521
	16/09/2010	-	-	1.307	1.307	6.253	4.946
	2/09/2010	-	-	1.328	1.328	6.253	4.925
	29/07/2010	-	-	0.912	0.912	6.253	5.341
	17/06/2010	-	-	1.528	1.528	6.253	4.725
	21/04/2010	-	-	1.122	1.122	6.253	5.131
	11/01/2010	1.669	0.001	1.670	1.669	6.253	4.584
MW-2	1/05/2012	-	-	0.973	0.973	6.085	5.112
	27/06/2011	-	-	1.493	1.493	6.085	4.592
	19/01/2011	-	-	0.844	0.844	6.085	5.241
	5/01/2011	-	-	1.831	1.831	6.085	4.254
	18/11/2010	-	-	2.029	2.029	6.085	4.056
	16/09/2010	-	-	1.274	1.274	6.085	4.811
	2/09/2010	-	-	1.333	1.333	6.085	4.752
	29/07/2010	-	-	1.560	1.560	6.085	4.525
	13/07/2010	-	-	1.528	1.528	6.085	4.557
	17/06/2010	-	-	1.476	1.476	6.085	4.609
	21/04/2010	-	-	0.936	0.936	6.085	5.149
	11/01/2010	-	-	1.784	1.784	6.085	4.301

TABLE 1
CURRENT AND HISTORICAL
GROUNDWATER ELEVATIONS
NEUMANN SERVICE STATION
116-118 SUGAR ROAD, MAROOCHYDORE, QUEENSLAND



Notes:

- measures taken on the 7/12/2010 may not be representative as it rained 150mm during the previous 7 days
- "-" denotes that no PSH was present;
- "*" groundwater elevation was unable to be calculated;
- Elevation TOC denotes the surveyed elevation of the Top Of Casing (TOC) of each well. Survey data was obtained from Coffey Environments 2008 Groundwater Monitoring Event report;
- DTW correction for PSH as follows: $WTc = Wtm - (Ht \times SGp)$ WTc = Corrected depth to water Wtm = Measured depth to water (mTOC). As all wells are nearly flush to ground level, mTOC is approximately m Below Ground Surface (mBGS). Ht = Measured

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**TABLE 1
CURRENT AND HISTORICAL
GROUNDWATER ELEVATIONS
NEUMANN SERVICE STATION**



116-118 SUGAR ROAD, MAROOCHYDORE, QUEENSLAND

MW-6	1/05/2012	-	-	0.924	0.924	6.726	5.802
	27/06/2011	-	-	1.760	1.760	6.726	4.966
	19/01/2011	-	-	0.956	0.956	6.726	5.770
	5/01/2011	-	-	3.080	3.080	6.726	3.646
	18/11/2010	-	-	2.921	2.921	6.726	3.805
	16/09/2010	-	-	1.340	1.340	6.726	5.386
	21/04/2010	-	-	0.772	0.772	6.726	5.954
	11/01/2010	-	-	2.060	2.060	6.726	4.666
MW-13	1/05/2012	-	-	1.227	1.227	5.108	3.881
	27/06/2011	-	-	1.530	1.530	5.108	3.578
	20/01/2011	-	-	1.211	1.211	5.108	3.897
	5/01/2011	-	-	1.164	1.164	5.108	3.944
	18/11/2010	-	-	1.463	1.463	5.108	3.645
	16/09/2010	-	-	1.284	1.284	5.108	3.824
	2/09/2010	-	-	1.585	1.585	5.108	3.523
	29/07/2010	-	-	2.538	2.538	5.108	2.570
	13/07/2010	Inaccessible at time of gauging. Vehicle parked over well					
	21/04/2010	-	-	1.105	1.105	5.108	4.003
	11/01/2010	-	-	2.159	2.159	5.108	2.949

Notes:

- measures taken on the 7/12/2010 may not be representative as it rained 150mm during the previous 7 days
- "-" denotes that no PSH was present;
- "##" groundwater elevation was unable to be calculated;
- Elevation TOC denotes the surveyed elevation of the Top Of Casing (TOC) of each well. Survey data was obtained from Coffey Environments 2008 Groundwater Monitoring Event report;
- DTW correction for PSH as follows: $WTc = Wtm - (Ht \times SGp)$ WTc = Corrected depth to water Wtm = Measured depth to water (mTOC). As all wells are nearly flush to ground level, mTOC is approximately m Below Ground Surface (mBGS). Ht = Measured depth to PSH product thickness. $SGp = \text{Specific gravity of product (relative density at } 20^{\circ}\text{C)}$ $SGp = 0.84$

**TABLE 1
CURRENT AND HISTORICAL
GROUNDWATER ELEVATIONS
NEUMANN SERVICE STATION**



116-118 SUGAR ROAD, MAROOCHYDORE, QUEENSLAND

MW-18	1/05/2012	-	-	0.873	0.873	4.944	4.071
	27/06/2011	-	-	1.136	1.136	4.944	3.808
	20/01/2011	Not available					
	5/01/2011	Inaccessible at time of gauging. Vehicle parked over well					
	18/11/2010	Inaccessible at time of gauging. Vehicle parked over well					
	8/10/2010	Inaccessible at time of gauging - well flooded					
	16/09/2010	-	-	1.057	1.057	4.944	3.887
	13/07/2010	Inaccessible at time of gauging. Vehicle parked over well					
	21/04/2010	-	-	0.908	0.908	4.944	4.036
	11/01/2010	-	-	1.768	1.768	4.944	3.176
MW-24	1/05/2012	-	-	1.536	1.536	6.743	5.207
	27/06/2011	-	-	1.569	1.569	6.743	5.174
	19/01/2011	-	-	0.834	0.834	6.743	5.909
	5/01/2011	-	-	1.835	1.835	6.743	4.908
	18/11/2010	Well dry. Unable to gauge				6.743	
	16/09/2010	-	-	1.467	1.467	6.743	5.276
	2/09/2010	-	-	1.564	1.564	6.743	5.179
	13/07/2010	Well dry. Unable to gauge				6.743	*
	17/06/2010	-	-	1.215	1.215	6.743	5.528
	21/04/2010	-	-	1.193	1.193	6.743	5.550
	11/01/2010	Well dry. Unable to gauge				6.743	*

Notes:

- measures taken on the 7/12/2010 may not be representative as it rained 150mm during the previous 7 days
- "-" denotes that no PSH was present;
- "***" groundwater elevation was unable to be calculated;
- Elevation TOC denotes the surveyed elevation of the Top Of Casing (TOC) of each well. Survey data was obtained from Coffey Environments 2008 Groundwater Monitoring Event report;

**TABLE 1
CURRENT AND HISTORICAL
GROUNDWATER ELEVATIONS
NEUMANN SERVICE STATION**



116-118 SUGAR ROAD, MAROOCHYDORE, QUEENSLAND

MW-25	1/05/2012	-	-	1.845	1.845	6.727	4.882
	27/06/2011	-	-	2.109	2.109	6.727	4.618
	19/01/2011	-	-	2.083	2.083	6.727	4.644
	5/01/2011	-	-	2.852	2.852	6.727	3.875
	18/11/2010	-	-	3.165	3.165	6.727	3.562
	16/09/2010	-	-	2.037	2.037	6.727	4.690
	2/09/2010	-	-	2.112	2.112	6.727	4.615
	29/07/2010	-	-	3.197	3.197	6.727	3.530
	17/06/2010	-	-	2.390	2.390	6.727	4.337
	21/04/2010	-	-	1.848	1.848	6.727	4.879
	11/01/2010	-	-	2.635	2.635	6.727	4.092
MW-39	15/05/2012	-	-	2.102	2.102	TBD	TBD
MW-40	15/05/2012	-	-	1.585	1.585	TBD	TBD

Notes:

- measures taken on the 7/12/2010 may not be representative as it rained 150mm during the previous 7 days
- "-" denotes that no PSH was present;
- "***" groundwater elevation was unable to be calculated;
- "TBD" denotes groundwater elevation not determined yet as level survey has not been performed;
- Elevation TOC denotes the surveyed elevation of the Top Of Casing (TOC) of each well. Survey data was obtained from Coffey Environments 2008 Groundwater Monitoring Event report.

O'Connor Gary

From: Mack Dreyer [mack@birchwoodenviro.com.au]
Sent: 28 May 2012 2:59 PM
To: O'Connor Gary
Subject: FW: Tables
Attachments: Analytical Tables.xlsx; May2012 benzene results.pdf
 Gary

Please find attached the results for the last round of monitoring at the Maroochydhore site. In general the groundwater petroleum hydrocarbon concentrations have decreased as compared to the June 2011 event with the exception of MW1, MW18 and MW24. I do note that this decrease in groundwater hydrocarbon concentration is generally associated with an increase in water table elevation (at least in the immediate vicinity of the wells – I note that in an unconfined system the higher the water table elevations generally means lower TPH concentrations). This increase in water table elevation is probably the result of the system being turned off (no draw down) or it may be associated with some heavy rainfall events in the area around the time of sampling.

I have drawn the benzene results on a Figure from the last report, scanned it and attached it to this email for your reference. I note there are some inconsistencies in the water levels between Table 1 and Table 2 in the Otek spread sheet. I will get them to correct this.

Please give me a call if you have any questions.

Regards

Mack

Mack Dreyer
Principal

P : (07) 3711 5088 M : (6) Personal information F : (07) 3711 5348
 PO Box 2342 Sunnybank Hills 4109



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From: Adam Breen [mailto:ABreen@otek.com.au]
Sent: Monday, 28 May 2012 1:37 PM
To: luis.cifuentes@exxonmobil.com
Cc: Mack Dreyer (mack@birchwoodenviro.com.au)
Subject: Tables

Luis,

Please find attached recent sampling of selected wells that previously contained the highest hydrocarbon concentrations. Please be aware this wasn't a planned GME but was in response to concerns that the remediation system had been off for some time.

Regards



Adam Breen
Senior Remediation Scientist

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A Level 1, 9/44 Station Road, Yeerongpilly QLD 4105

E abreen@otek.com.au

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Winner of the Australia-China Business Award 2011 - Austrade Business Promotion Award.



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In 2012 OTEK celebrates 20 years of providing innovative environmental, remediation and engineering excellence throughout the Australasian region.

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TABLE 2
CURRENT ANALYTICAL SUMMARY -
GROUNDWATER SAMPLES (TRH and BTEX)
NEUMANN SERVICE STATION
116-118 SUGAR ROAD, MAROOCHYDORE, QUEENSLAND

	BTEXN (µg/L)						TRH (µg/L)			
	Benzene	Toluene	Ethylbenzene	o- Xylenes	m- p- Xylenes	Naphthalene	TRH (C6-C10) F1	TRH (>C10-C16)	TRH (>C16-C34)	TRH (>C34-C40)
SSTL (Unrestricted Land-Use) [µg/L]	430	20,000	1,730,000	63,000		660	15,000	na	na	na

Sample ID	Groundwater Depth (m)	Date Sampled	11	<2	10	<2	12	16	30	300	2030	160
MW-1	0.873	1/05/2012	11	<2	10	<2	12	16	30	300	2030	160
MW-2	0.973	1/05/2012	277	371	245	327	766	57	1070	310	110	<100
MW-6	0.924	1/05/2012	3	<2	5	2	3	25	30	110	<100	<100
MW-13	1.227	1/05/2012	26	6	27	37	56	19	300	560	460	<100
MW-18	0.873	1/05/2012	984	356	162	514	627	40	840	1920	160	<100
MW-24	1.536	1/05/2012	548	240	138	756	4260	39	2310	900	210	<100
MW-25	1.845	1/05/2012	1280	8	206	11	1260	60	1020	2540	960	<100
MW-39	2.102	15/05/2012	<1	<2	<2	<2	<2	<5	<20	150	100	<100
MW-41	1.585	15/05/2012	713	17	407	4	29	253	970	3240	460	<100

Notes:

- Sample ID: MW-# denotes a water sample obtained from a groundwater Monitoring Well;
- '<#' indicates analyte not detected above laboratory Limit Of Reporting (LOR);
- 'µg/L' indicates microrams of analyte per litre of water;
- - Site Specific Target Levels (SSTL's - Unrestricted Land Use) as derived in OTEK report - Revision of Site Specific Target Levels , dated 17 May 2012;
- 'NA' denotes no criteria available; and
- Shading indicates concentration in excess of relevant SSTL .

O'Connor Gary

From: O'Connor Gary
Sent: 28 May 2012 10:06 AM
To: Delzoppo Lindsay
Cc: Ready Kelli
Subject: FW: Mobil Sugar Road Maroochydore
 Lindsay

sch4p4(6) Personal information I'm endeavouring to make sure priority sites are managed appropriately. This site is on the CLR and activity has "slowed" a bit. I'm keen to see Mobil do some more recovery work and will inspect the site on Wednesday with the TPR. I'll get a lift with Mack.

cheers

goc

Gary O'Connor
 Manager, Project Support
 Environmental Performance and Coordination Branch

Telephone: 67 7 3330 5708

Facsimile: 61 7 3330 5754

Mobil sch4p4(6) Personal information

From: Cifuentes, Luis /C [mailto:luis.cifuentes@exxonmobil.com]
Sent: 28 May 2012 9:16 AM
To: Mack Dreyer; 'Brendan Ebzery'; AHunt@kleinfelder.com
Cc: 'Adam Breen'; 'Marc Andrews'; O'Connor Gary
Subject: RE: Mobil Sugar Road Maroochydore

Hi Mack,

I understand the injection will start this Wednesday and I am planning to be on site as well. This will be a good opportunity to meet up.

Kind Regards,

Luis Eduardo Cifuentes
 CTC Program Manager
 ExxonMobil Environmental Services - Mobil Oil Australia Pty Ltd
 12 Riverside Quay, Southbank, VIC 3006.
 Phone: +61 3 9622 7824 / Mobil sch4p4(6) Personal information

From: Mack Dreyer [mailto:mack@birchwoodenviro.com.au]
Sent: Monday, 28 May 2012 9:11 AM
To: 'Brendan Ebzery'; Cifuentes, Luis /C; AHunt@kleinfelder.com
Cc: 'Adam Breen'; 'Marc Andrews'; O'Connor Gary
Subject: RE: Mobil Sugar Road Maroochydore

Brendan

Can you please advise me when the surfactant injection is occurring. I would like to do a site inspection while this is being done.

Gary would like to inspect the site as well. I could pick you up on the way through.

Regards

Mack

Mack Dreyer

Principal

P : (07) 3711 5088 M : (07) 3711 5348
PO Box 2342 Sunnybank Hills 4109



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From: Brendan Ebzery [mailto:BEbzery@otek.com.au]
Sent: Monday, 28 May 2012 8:52 AM
To: Mack Dreyer; Cifuentes, Luis /C; AHunt@kleinfelder.com
Cc: Adam Breen; Marc Andrews
Subject: RE: Mobil Sugar Road Maroochydore

Mack

Three additional wells were installed in the source area approx 4 weeks ago. Sampling of selected wells was completed approx 3 weeks ago. System maintenance has been performed. The surfactant injection is occurring this week with the system being restarted next week. Adam will provide details of the results of the works undertaken in the near future. Thank you.

Regards



Brendan Ebzery
National Remediation Manager
Senior Principal Remediation Scientist
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O'Connor Gary

From: O'Connor Gary
Sent: 25 May 2012 3:39 PM
To: 'Mack Dreyer'; 'luis.cifuentes@exxonmobil.com'
Cc: 'AHunt@kleinfelder.com'; 'bebzery@otek.com.au'; 'MAndrews@otek.com.au'
Subject: RE: Mobil Sugar Road Maroochydore
Importance: High
 Mack & Luis

I note that it has been a month since our last communications. If you could please advise of the results of the GME and the status of the recommissioning of the system.

Regards

Gary O'Connor
 Manager, Project Support
 Environmental Performance and Coordination Branch

Telephone: 67 7 3330 5708
 Facsimile: 61 7 3330 5754
 Mobile: 04 (6) Personal information

From: O'Connor Gary
Sent: 30 April 2012 9:36 AM
To: 'Mack Dreyer'
Cc: luis.cifuentes@exxonmobil.com; AHunt@kleinfelder.com; bebzery@otek.com.au; MAndrews@otek.com.au
Subject: RE: Mobil Sugar Road Maroochydore

Thanks Mack

I agree with your recommendation for a GME prior to recommissioning of the system. These matters (the GME and recommissioning) should be attended to Mobil without delay.

Regards

Gary O'Connor
 Manager, Project Support
 Environmental Performance and Coordination Branch

Telephone: 67 7 3330 5708
 Facsimile: 61 7 3330 5754
 Mobile: 04 (6) Personal information

From: Mack Dreyer [mailto:mack@birchwoodenviro.com.au]
Sent: 27 April 2012 5:59 PM
To: O'Connor Gary
Cc: luis.cifuentes@exxonmobil.com; AHunt@kleinfelder.com; bebzery@otek.com.au; MAndrews@otek.com.au
Subject: RE: Mobil Sugar Road Maroochydore

Gary

Thank you for your enquiry. I understand that Kleinfelder/Otek will be providing me a response to your queries shortly. However, the following is a quick summary from my perspective.

It is my understanding that the remediation system at the site is still to be re commissioned following its shutdown in June/July 2011 (as per my correspondence of 16 November). Otek are conducting some maintenance works on the system and I have been advised that it will be up and running soon. Clearly the length of time the system has been off-line is unacceptable for a site that is on the CLR with a Remediation Notice.

The last GME on the site was in June 2011 and I have a copy of the report for this monitoring event. Attached are Figures with the benzene and TPH results from this monitoring event. (Please note my view is that the inferred contours on the Figures aren't reliable but I guess the real story is the actual results on the Figures.) I have recommended that another GME or at least a partial GME be conducted at the site before the system is recommissioned to at least get an understanding as to what sort of rebound we have at the site following the system shut down, noting that the majority of the wells where the highest impacts are observed are also extraction wells.

Otek have undertaken a risk assessment at the site to develop groundwater site specific remediation criteria. This report has been reviewed by Jackie Wright and comments supplied to Otek. Yesterday I spoke to the Otek risk assessor who was addressing Jackie's comments and I understand the report should be available for review in the very near future (this afternoon I did have a missed call from the Otek project manager regarding the delivery of the risk assessment report).

Otek have prepared a proposal to undertake a surfactant injection program at the site that I am currently reviewing, but I must admit the fact that we are still pulling approximately 7kgs of hydrocarbon from the site per day prior to the system being shut down does concern me (I think we have a fair way to go – I have asked for tank and line testing to be undertaken but there is an issue in that the site is no longer owned by Mobil). Otek have reported that 4,965 kg of product has been removed from the site since the current system was commissioned in October 2009.

Please contact me if you have any questions and I will forward you Kleinfelder/Otek's response to your questions when it is available. I will also let you know if I can get agreement to a GME prior to the recommissioning of the system.

Regards

Mack.

Mack Dreyer
Principal

P : (07) 3711 5088 s4(6) Personal information (07) 3711 5348
 PO Box 2342 Sunnybank Hills 4109



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From: O'Connor Gary [mailto:Gary.O'Connor@derm.qld.gov.au]
Sent: Friday, 27 April 2012 3:56 PM
To: Mack Dreyer
Cc: luis.cifuentes@exxonmobil.com; AHunt@kleinfelder.com
Subject: Mobil Sugar Road Maroochydore

Mack

As you are aware the former project manager for the above site, Greg O'Brien s4(6) Personal information, I'm following through on a number of matters and request an update, in your role as TPR, on the status of the above site.

In particular I request information on:

- The status of hydrocarbon extraction system, including the amount of hydrocarbon recovered;
- The most recent groundwater monitoring results;
- The results of any recent tank integrity testing; and
- The progress of Mobil towards completion of the RAP, as set out under the Remediation Notice.

Regards

Gary O'Connor
 Manager, Project Support
 Environmental Performance and Coordination Branch

Telephone: 67 7 3330 5708
 Facsimile: 61 7 3330 5754
 Mobile: s4(6) Personal information

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O'Connor Gary

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Sent: 30 April 2012 9:36 AM
To: 'Mack Dreyer'
Cc: luis.cifuentes@exxonmobil.com; AHunt@kleinfelder.com; bebzery@otek.com.au; MAndrews@otek.com.au
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 Environmental Performance and Coordination Branch

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Regards

Mack.

Mack Dreyer

Principal

P : (07) 3711 5088 s4(6) Personal information (07) 3711 5348
PO Box 2342 Sunnybank Hills 4109



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Subject: Mobil Sugar Road Maroochydore

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The progress of Mobil towards completion of the RAP, as set out under the Remediation Notice.

Regards

Gary O'Connor
Manager, Project Support
Environmental Performance and Coordination Branch

Telephone: 67 7 3330 5708

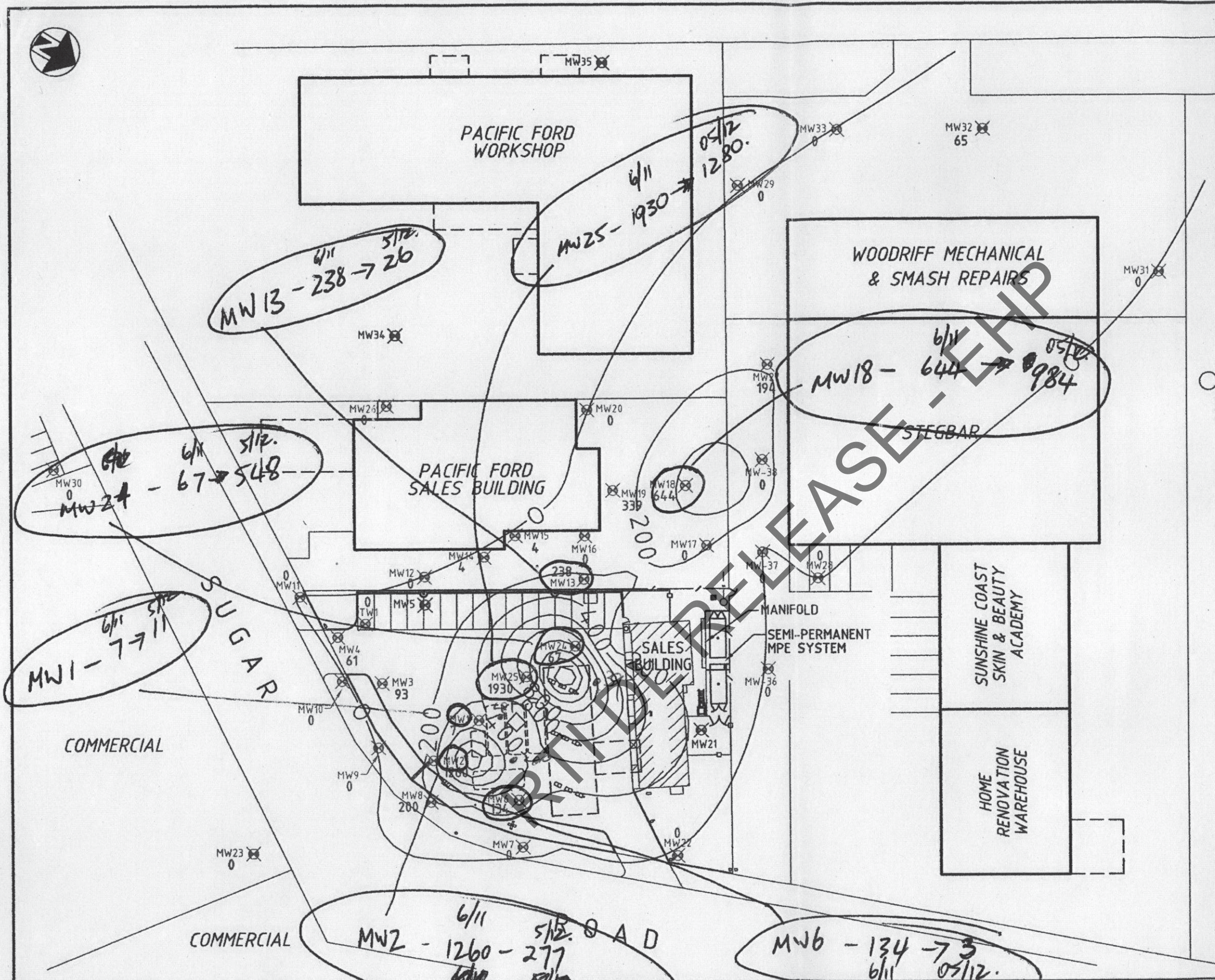
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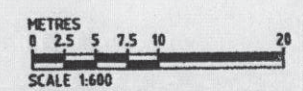
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DTW(m)	06/11	05/12
MW1	NA RAIN WATER ENTERED	0.873
MW2	1.493	0.973
MW6	1.760	0.924
MW13	1.53	1.227
MW18	1.136	0.873
MW24	1.569	1.536
MW25	2.109	1.845

- LEGEND**
- INDICATES BUILDINGS
 - FENCE
 - MW## EXISTING MONITORING WELL
 - MW## LOST/DESTROYED MONITORING WELL
 - ## GROUNDWATER BENZENE CONTOUR INTERVAL @ 200 ug/L
 - ## TOTAL BENZENE CONCENTRATION (ug/L)



01	31.08.11	ORIGINAL ISSUE	REM	AB
ISSUE	DATE	AMENDMENTS	DRN	CKD

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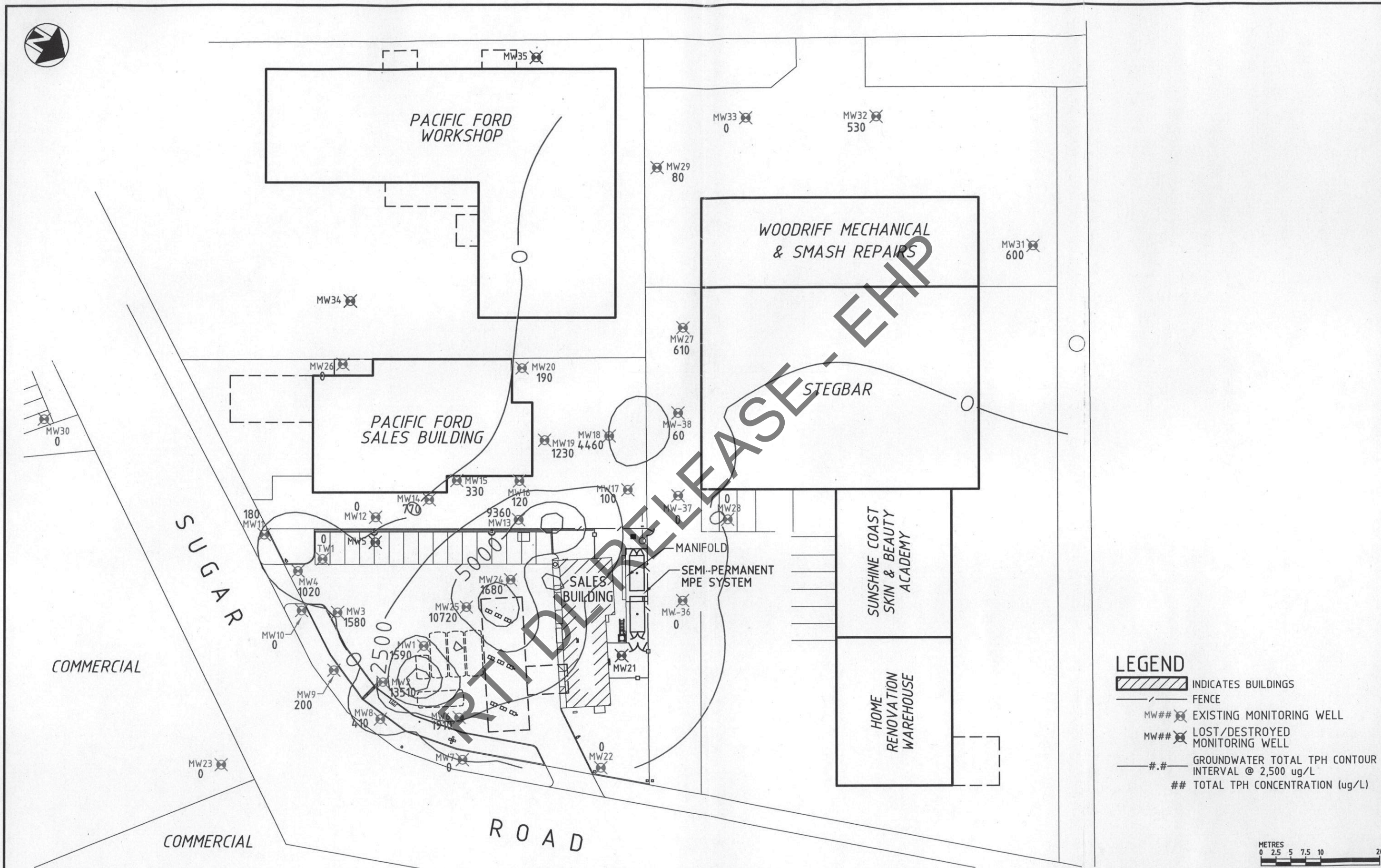
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INFERRED BENZENE CONTOUR MAP
 GROUNDWATER MONITORING EVENT & SYSTEM PERFORMANCE REPORT (JUNE 2011)
 MOBIL OIL AUSTRALIA, MAROOCHYDORE, QLD

SHEET A3	DRAWN: REM REV: 01	DATE: 31.08.11 DWG NAME: 5209C12F83	CHECKED	APPROVED	FIG No: FIGURE 4
-------------	-----------------------	--	---------	----------	-------------------------



LEGEND

INDICATES BUILDINGS

FENCE

MW## EXISTING MONITORING WELL

MW## LOST/DESTROYED MONITORING WELL

GROUNDWATER TOTAL TPH CONTOUR INTERVAL @ 2,500 ug/L

TOTAL TPH CONCENTRATION (ug/L)

METRES
0 2.5 5 7.5 10 20
SCALE 1:600

01	31.08.11	ORIGINAL ISSUE	REM	AB
ISSUE	DATE	AMENDMENTS	DRN	CKD
"COMMERCIAL IN CONFIDENCE"				

OTek

ABN 32 054 371 596

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SYDNEY
TEL (02) 9417 4499
FAX (02) 9417 2314

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FAX (07) 3426 5299

PERTH
TEL (08) 9227 9000
FAX (08) 9227 9009

ADELAIDE
TEL (08) 8423 4480
FAX (08) 8423 4500

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INFERRED TOTAL TPH CONTOUR MAP
GROUNDWATER MONITORING EVENT & SYSTEM PERFORMANCE REPORT (JUNE 2011)
MOBIL OIL AUSTRALIA, MAROOCHYDORE, QLD

SHEET
A3

DRAWN: REM
REV: 01

DATE: 31.08.11
DWG NAME: 5209012F84

CHECKED
APPROVED

FIG No: **FIGURE 5**

Memorandum

To file File Reference _____

From gpc

Subject Summary 120 Sugar Rd Marshfield Date 24/4/12

Initial ES4 Dec - Jan 2001 Notes gradient at 12mm/m
3 BHMW, 20 soil borings 3.12L/sec
PSH in MW2 & MW6 3.5cm - 1cm
Upto 35 mg/L Benzene & 3mg/L toluene
Additional wells 16/12/01
PSH in MW2, 6 & 13 0.37cm 37cm
MPE conducted 18/1/01 3/8/2001
Additional bores installed in Oct 2001
(Vacuum truck on MW2 & MW6 for 9 hrs)
PSH rose after
Subst Additional bores installed March 2002
for MW13 thickness 7.2 cm
high BTEX core
Site tested on CLR 8/10/02 & Remed notice
issued Oct 2002 - requirement for RAP so
that land no longer constitute serious env harm
with sufficient info to remove lot 2 from
CLR & EMR (TPR requirement & MD)
with complete RAP within 60 days
RAP submitted 11/11/02
Notice extended to 30/6/05
IT Env report of April 2003 provides figures
with gradients - RAP
MW13 had 63cm Oct 2002
Feb 2003 MW13 - 16 cm MW17 2.3 cm
Seen on MW6 MW18 MW20
SNE trial late Nov 2002
Draw down tests conducted hydraulic
conductivity 70m/day
 $\sigma = K \cdot i$
Report sets out Remedial strategies
interception trenches - collect PSH

2001 a dry year
bores screened below water table

Sunshine Coast Airport 090861

Memorandum

(2)

To file File Reference BNE 9848

From g/w

Subject Sugar Rd Summary Cont. Date _____

Treatment of g/w by air sparging/polishing Notes

leider consulting MW13 2-8 year old

petrol (likely leaded petrol)

Soil to g/w system installed 2004

Chart of PSH thickness in MW13 in status

support of 30/5/03.

Tranche actually put in April 2005

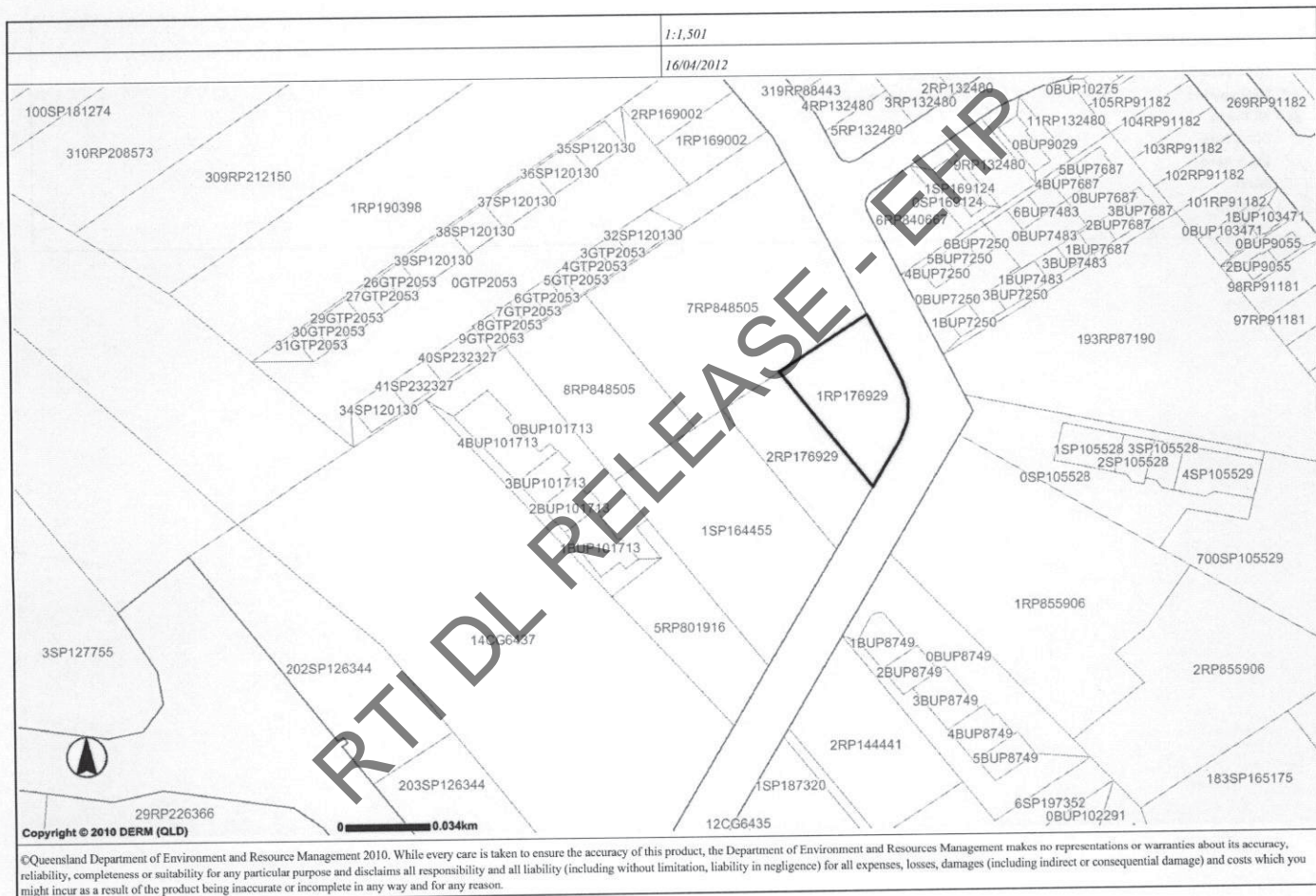
OTEK MPE installed in 2009

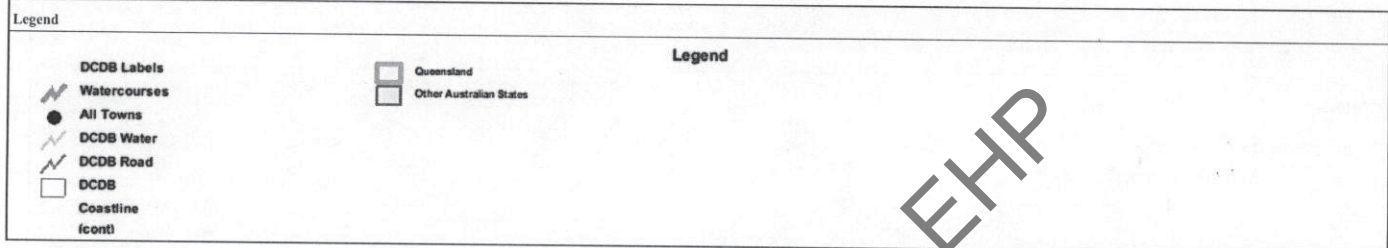
& reasonable quantity of material removed

Long TPR for update with request

via email

RTI DL RELEASE





RTI DL RELEASE - EHP

O'Connor Gary

From: O'Brien Greg
Sent: 28 September 2010 1:20 PM
To: Mark Stonebridge
Subject: RE: 108-112 Sugar Rd, Alexandra Headland
 Mark

I am able to provide you with the following information on the site.

The site which is the original cause of the petroleum contamination (service station) is under a Remediation Notice to Mobil Australia issued under the Environmental Protection Act 1994 (EPAct). The site above (the Stegbar site) has been listed on the EMR as there is evidence some contamination did migrate onto that site and a larger amount onto the site at 120 Sugar Road.

The Notice requires that all affected sites be cleaned up including the Stegbar site so that it can be removed from the Environmental Management Register (EMR). It typically takes some years for such work to be completed although it is well advanced in this case.

To this end, Mobil has established and operated clean up facilities for some years to extract the contamination from affected sites which is assisted by natural degradation of the petroleum products in the ground. More recent results of groundwater testing show improvements but more work needs to be done to validate that the cleanup has reached a satisfactory standard. The cleanup consultant's work is overseen by an independent Third Party Reviewer (TPR) appointed by this Department (DERM) under a specific operational policy and the final state of the land must be certified by the TPR.

Should a development application be made to Council for a material change of use of the property, the development would be referred to DERM for conditions. The following 2 outcomes are possible.

- In normal circumstances of a redevelopment involving demolition and construction of new buildings and site excavation, DERM would require that sufficient investigations and information be provided to demonstrate that the land was suitable for the intended use from a contamination perspective and for the appointment of a TPR to certify the works carried out by the consultant. The usual process ends with the land either removed from the EMR after certification or the land use is permitted with conditions of use under a Site Management Plan approved under the EP Act
- In the case where the development essentially involves use/refurbishment of the existing buildings, no demolition or new building construction and does not involve any site excavations other than of a minor nature, DERM may consider an application to allow the proposed use with conditions about limited site excavations. In other words if the site is not going to be disturbed, the proposed land use may be permitted without any further work.

You are at liberty to engage a suitable and recognised contaminated land consultant to confirm these matters and provide any other specific advice that you are seeking. A consultant would be hampered by access to reports of site contamination. However, the situation is unusual with the Remediation Notice and the obligation on Mobil to remedy the situation. It would potentially be a conflict of interest for the TPR to consult with you on this issue. I am happy to discuss and explain this matter further on the basis that DERM is only able to provide advice on legislative processes and operational procedures as they apply.

Regards

Greg O'Brien
 Chief Scientific Advisor, Project Support
 Environmental Services
 Department of Environment and Resource Management

ph 61 07 33305709
 fax 61 07 33305754
 Visit us on line: www.derm.qld.gov.au

Release

From: Mark Stonebridge [mailto:Mark.Stonebridge2@suncomotors.com.au]
Sent: Monday, 27 September 2010 2:12 PM
To: O'Brien Greg
Subject: 108-112 Sugar Rd, Alexandra Headland

Hi Greg,

Further to our conversation, I am currently in the process of organising due diligence for a property located at 108-112 Sugar Rd, Alexandra Headland.

We have been advised that the property has been placed on the Environmental Management Register due to a leak at the adjoining Newmans petrol station.

As part of the due diligence process, I would like to employ an independent assessor to advise on any issues related to the above.

If you could advise what information is available and recommend an independent assessor it would be greatly appreciated.

Kind Regards

Mark Stonebridge
Financial Controller

(07) 5442 0373

sch4p4(6) Personal information

RTI DL RELEASE - EHP

O'Connor Gary

From: Mack Dreyer [mdreyer@butlerpartners.com.au]
Sent: 7 June 2010 2:57 PM
To: O'Brien Greg
Cc: Barry Kim
Subject: Sugar Road
Attachments: enquiries@butlerpartners.com.au_20100607_091924.pdf

Greg

Mobil have had Coffey undertake a risk assessment at the Sugar Road Maroochydore site. I have had Jackie Wright review it and after a bit of correspondence we are at a stage where Jackie is happy with the risk assessment. I have attached a copy of the conclusions of the risk assessment report (including the RBLs). I am happy enough with the outcomes of the risk assessment, but I guess the only thing that concerns me is that there has been an assumption that, as there is reticulated potable water in the area, then off-site groundwater use is not expected. Coffey have done an assessment based on this assumption and I do note that they have done a survey of the area, at this stage no one down gradient of the site is using groundwater. What do you think?

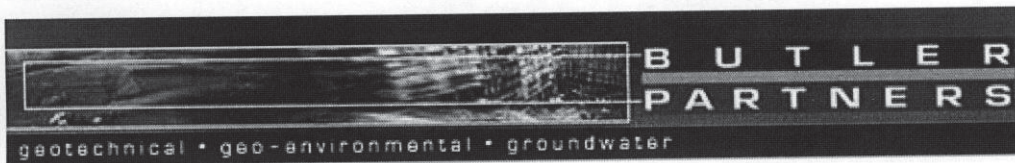
Otek did a GME in January (I have only just got the report) and if anything, the groundwater TPH and Benzene concentrations have increased (PSH was observed at MW1 – where it wasn't observed in the last GME). Otek are arguing that this is because a cone of depression has been created in the impacted area causing more hydrocarbon to be drawn in. Their argument hasn't really been supported by a discussion on the extent of the drawdown and I will get them to do this, but in saying this the fact of the matter is they are continuing to remove large amounts of hydrocarbon (vapour) so the system is working to some extent.

As the system performance data is up until 8 February I will try and get more up to date information. I will let you know when it arrives.

Let me know if you have any questions/issues.

Regards

Mack



Mack Dreyer

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RTI DL RELEASE - EHP

12 CONCLUSION

A quantitative HERA has been conducted by Coffey Environments to evaluate the potential impacts on human health posed by petroleum hydrocarbon impacted media currently identified on-site and off-site inferred to be associated with the Former Mobil Maroochydore Service Station (QL3815).

Based on available data and constraints of the assessment model, groundwater fate and transport modelling indicates that when the groundwater plume reaches stabilised conditions, marine ecological water quality guidelines (ANZECC & ARMCANZ, 2000) for benzene (500µg/L), toluene (180µg/L), ethylbenzene (5µg/L) and xylene (425µg/L – sum of xylene isomers) may be exceeded up to distances of 45m, 60m, 60m, and 40m (respectively) hydraulically down-gradient of the source zone. As the closest marine water system is a lagoon located approximately 500m to the south-west of the site, marine ecosystems are unlikely to be impacted as a result of the identified impact. Note that for the purpose of this assessment, these transport distances should be applied hydraulically down-gradient from the leading edge of the migrated LNAPL body, which was assumed to be at MW13.

Groundwater modelling requires a number of assumptions regarding the site conceptual model, aquifer characteristics and source composition. Parameter estimates introduce uncertainty in groundwater models. The current model had three calibration points of known contaminant concentrations and measured aquifer properties. The model calibrated well with expected values, therefore there is considered to be confidence in the model predictions.

Given COPC concentrations within the groundwater plume exceed criteria established for potable and recreational use, groundwater on-site and off-site within the area of investigation may not be suitable for extractive uses. No known registered or unregistered groundwater extraction bores currently exist within the current known extent of the groundwater contaminant plume and there is a reticulated water supply in the area. Therefore, future extractive use of groundwater is considered unlikely. However, extraction of groundwater within the current / future extent of the hydrocarbon plume should be restricted until such time as impact is reduced to acceptable levels.

Based on available data, exposure assumptions and constraints of the exposure assessment model, it was considered that measured COPC concentrations in groundwater, as presented in this report, may pose an unacceptable health risk to:

- potential future off-site residential occupants within a slab-on-ground residential dwellings at 120 Sugar Road where vapours emitted within the sub-surface migrate into a slab-on-ground structure;
- potential future off-site residential occupants within a single level basement structure at 120 Sugar Road where vapours emitted within the sub-surface migrate into a basement structure;
- off-site maintenance workers within a sub-surface maintenance trench where workers come into direct contact with petroleum hydrocarbon impacted groundwater, and/or inhale COPC vapours emitted from impacted groundwater within the trench; and
- off-site construction workers within a single level basement excavation at 120 Sugar Road where workers come into direct contact with petroleum hydrocarbon impacted groundwater, and/or inhale COPC vapours emitted from impacted groundwater within the excavation.

RBLs – 120 Sugar Road

The property at 120 Sugar Road, which is immediately south of the site, is unlikely to be redeveloped in the future to a residential land use but this land use setting is likely to be the criteria against which potential removal of the site from the EMR is to be assessed. The RBLs derived for 120 Sugar Road are presented in the table below.

COPC	Slab-on-ground Residential Dwelling [mg/L]	Single Level Residential Basement with Passive Ventilation [mg/L]	
		Carpark	Storeroom
	Vapour Inhalation	Vapour Inhalation	Vapour Inhalation
Benzene	1.0 ⁽¹⁾	2.1 ⁽¹⁾	1.1 ⁽¹⁾
	1.3 ⁽²⁾	2.8 ⁽²⁾	3.5 ⁽²⁾
Toluene	54	100 ⁽²⁾	123 ⁽²⁾
Ethylbenzene	>Sol	>Sol	>Sol
Xylenes	>Sol	>Sol	>Sol
Naphthalene	0.97 ⁽²⁾	4.2 ⁽²⁾	4.6 ⁽²⁾
1,2-dichloroethane ⁽³⁾	442 ⁽²⁾	1,310 ⁽²⁾	1,660 ⁽²⁾
TPH C ₆ -C ₉ Aliphatic	>Sol	3.5 ⁽²⁾	4.4 ⁽²⁾
TPH C ₁₀ -C ₁₄ Aromatic	10 ⁽²⁾	24 ⁽²⁾	>Sol
TPH C ₁₀ -C ₁₄ Aliphatic	>Sol	>Sol	>Sol

COPC	Sub-surface Maintenance Trench [mg/L]		Single Level Basement Construction Excavation [mg/L]	
	Vapour Inhalation	Direct Contact	Vapour Inhalation	Direct Contact
Benzene	3.5 ⁽¹⁾	5.4 ⁽¹⁾	51 ⁽¹⁾	40 ⁽¹⁾
	5.4 ⁽²⁾	8.0 ⁽²⁾	2.6 ⁽²⁾	2.0 ⁽²⁾
Toluene	261 ⁽²⁾	978 ⁽²⁾	129 ⁽²⁾	244 ⁽²⁾
Ethylbenzene	>Sol	257 ⁽²⁾	>Sol	64 ⁽²⁾
Xylenes	>Sol	101 ⁽²⁾	>Sol	25 ⁽²⁾
Naphthalene	0.72 ⁽²⁾	2.5 ⁽²⁾	0.36 ⁽²⁾	0.63 ⁽²⁾
1,2-dichloroethane ⁽³⁾	636 ⁽²⁾	19 ⁽¹⁾	>Sol	141 ⁽¹⁾
TPH C ₆ -C ₉ Aliphatic	>Sol	13 ⁽²⁾	>Sol	3.2 ⁽²⁾
TPH C ₁₀ -C ₁₄ Aromatic	>Sol	5.1 ⁽²⁾	16 ⁽²⁾	1.3 ⁽²⁾
TPH C ₁₀ -C ₁₄ Aliphatic	>Sol	83 ⁽²⁾	3.8 ⁽²⁾	21 ⁽²⁾
TPH C ₁₅ -C ₂₈ Aromatic	N/A	22 ⁽²⁾	N/A	5.6 ⁽²⁾
TPH C ₁₅ -C ₂₈ Aliphatic	N/A	946 ⁽²⁾	N/A	236 ⁽²⁾
TPH C ₂₉ -C ₃₆ Aromatic	N/A	17 ⁽²⁾	N/A	4.2 ⁽²⁾
TPH C ₂₉ -C ₃₆ Aliphatic	N/A	946 ⁽²⁾	N/A	236 ⁽²⁾

N/A Not applicable – not considered as a COPC for the exposure scenario.

>Sol The calculated RBL is greater than the saturated concentration of the chemical in water.

1 Carcinogenic (non-threshold) toxicological end-point for benzene.

2 Non-carcinogenic (threshold) toxicological end-point for benzene.

3 Also known as ethylene dichloride and 1,2-DCA.

Application of RBLs – 120 Sugar Road

The RBLs were derived in order to be protective of human health and it is important to note that for some substances other impacts may require assessment should acceptable health endpoints be met. These may include aesthetic considerations (including odour impacts), ecological impacts or impacts to soil due to absorption and adsorption. Considerations other than human health have not been considered in this assessment.

Given the complexity associated with assessing mixtures, where more than one non-threshold COPC is reported in a sample, the HI must be calculated using a weighed approach. This approach is consistent with the HERA process for addressing potential additivity of non-threshold COPC in a contaminant mixture.

Where TPH fraction data is not separated into aromatic/aliphatic fractions, as a conservative measure it is recommended that the aromatic RBL be adopted.

The HERA has been limited to addressing the impacts of selected substances, to an assumed receptor population under specific exposure scenarios, based on information available at the time of the assessment. The risk assessment approach presented does not consider a fully probabilistic estimate of risk, but presents conditional estimates based on a number of assumptions regarding exposure and toxicity consistent with the nationally endorsed regulatory approach. Further assessments are required to properly assess risk where site uses vary from the assumed site conditions and/or exposure settings used in this risk assessment.

This report must be read in conjunction with the attached 'Important Information about Coffey Environments Report for Mobil'.

O'Connor Gary

From: Mack Dreyer [mdreyer@butlerpartners.com.au]
Sent: 3 February 2010 4:50 PM
To: Greg O'Brien
Subject: Sugar Road
Attachments: enquiries@butlerpartners.com.au_20100203_155814.pdf;
enquiries@butlerpartners.com.au_20100203_164838.pdf;
enquiries@butlerpartners.com.au_20100203_164901.pdf

Greg

Just to keep you in the loop, I have had a meeting with Mobil and Otek regarding Sugar Road. The remediation system is continuing to operate and they are still recovering 20 to 30 kgs hydrocarbon mass per day with upwards of 2,750 kg removed in total (I have attached a Figure I was presented with at the meeting). I did express concern that these numbers seem to be very high considering the impact that was identified on the site and Otek are adamant that the results are real. They say they have spot checked their equipment with duplicate instruments and the results are reproducing well.

I also asked that if this is the case then what is happening to the vapour from the system. Basically they didn't have an answer for this other than to say it was being put up the stack (I thought they had activated carbon polishing on the stack but apparently they don't). Consequently I have asked for a risk assessment and Ausplume model to establish if further off gas treatment is required. Mobil have agreed that this assessment needs to be undertaken.

Otek undertook a limited GME in early January and as a result of this GME Otek have turned off the vacuum to five of the peripheral wells (results generally approaching LOR). I was advised that the wells turned off were MW9, 10, 14, 15 and 20. This is the first I had heard of this and at this stage I don't have a big drama with it although I am not sure I entirely agree with MW15 being turned off.

Removing these wells from the system has increased the vacuum at the remaining wells and this resulted in a slight increase in recovery as shown on the graph in late January early February. I should point out that MW16 is not currently connected to the system but it is being connected at the moment and they should be able to pull from it shortly.

It is also worth noting that on-site groundwater TPH/BTEX results appear to have increased (as observed in the January monitoring round) as a result of the remediation works (impact being mobilised?) which probably means we still have some way to go to have this problem addressed.

Give me a call if you have any questions.

Regards

Mack



Mack Dreyer

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Hydrocarbon Mass and Time (Mobil Maroochydore)

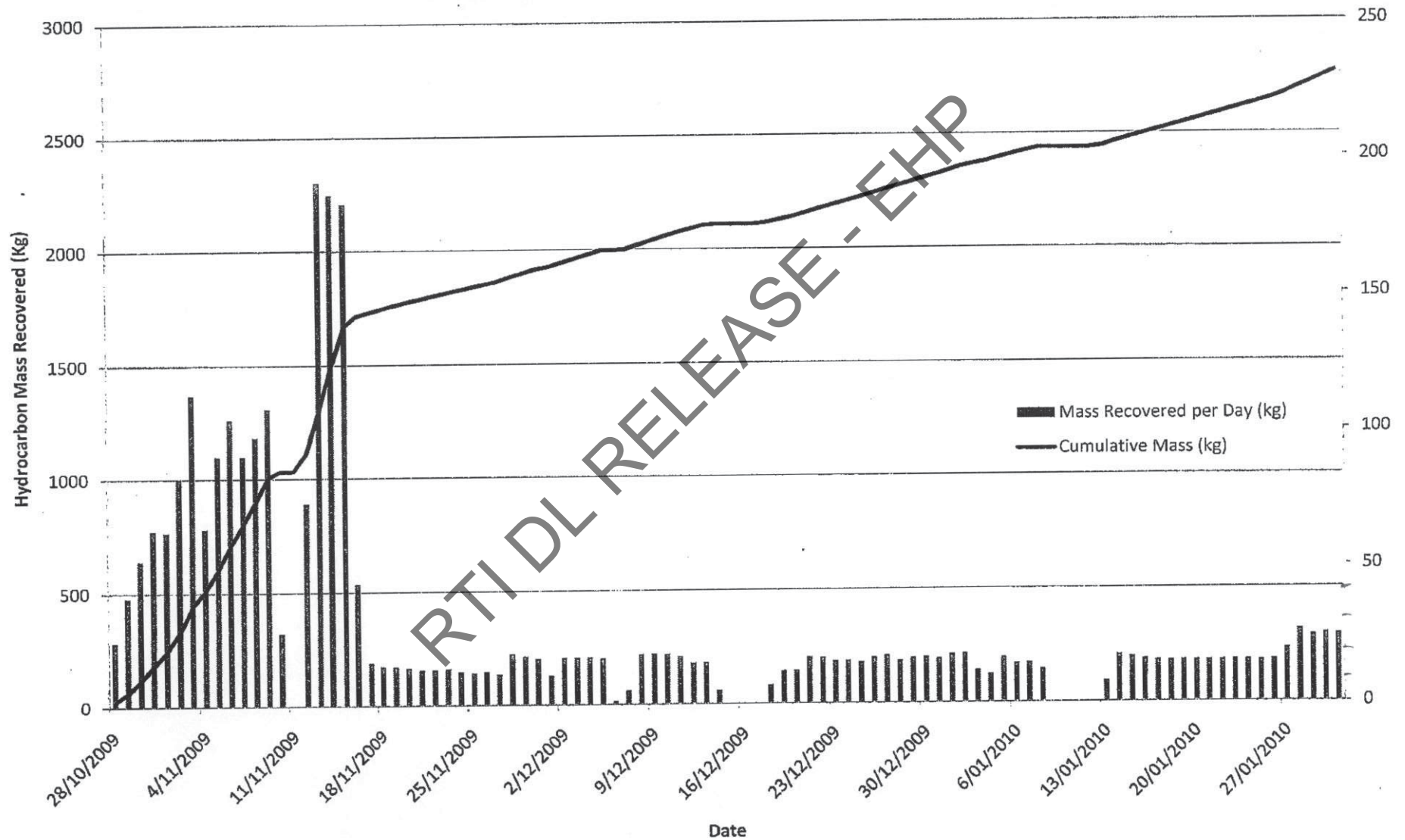


TABLE 3
CURRENT ANALYTICAL SUMMARY - GROUNDWATER SAMPLES (TPH and BTEX)
 Mobil Oil Australia
 Neumann Service Station - Maroochydore, Queensland (QL3815)

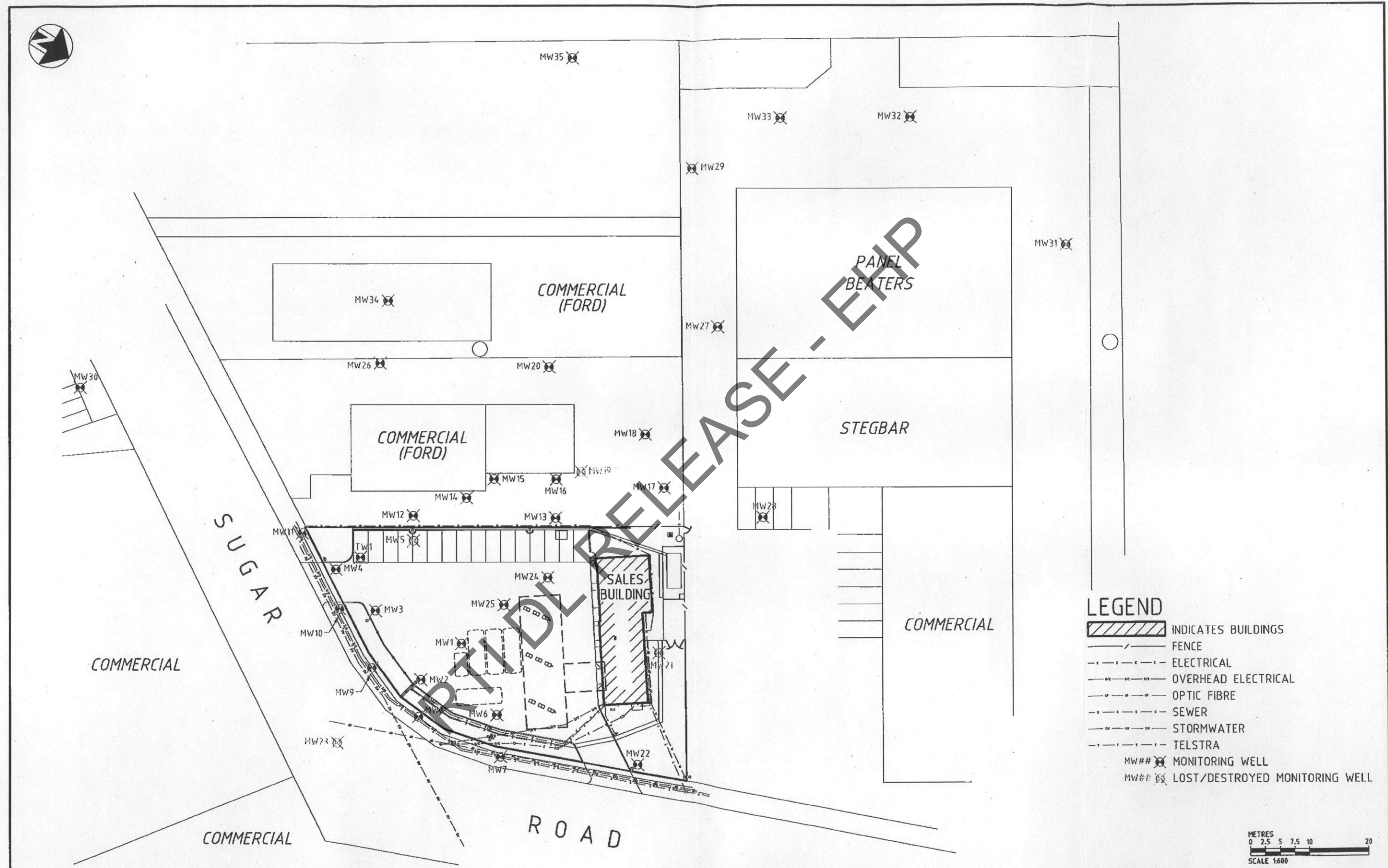


	TPH					BTEX				
	TPH C ₆ -C ₉ Fraction	TPH C ₁₀ -C ₁₄ Fraction	TPH C ₁₅ -C ₂₈ Fraction	TPH C ₂₉ -C ₃₆ Fraction	Total TPH	Benzene	Toluene	Ethylbenzene	o-Xylene	m,p-Xylene
	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
LOR	20	50	100	50	^	1	2	2	2	2
Anzecc Guidelines (2000)	Refer to comments below.					950	180	80	200	350

Sample ID	Date Sampled	TPH C ₆ -C ₉ Fraction	TPH C ₁₀ -C ₁₄ Fraction	TPH C ₁₅ -C ₂₈ Fraction	TPH C ₂₉ -C ₃₆ Fraction	Total TPH	Benzene	Toluene	Ethylbenzene	o-Xylene	m,p-Xylene
MW-1	11-January-2010	171000	465000	46400	<2570	682400	37500	75500	4470	22500	8900
MW-2	11-January-2010	14500	5480	1130	70	21180	3440	2500	1480	3420	1210
MW-3	11-January-2010	4140	1800	550	70	6560	1110	<50	455	1500	73
MW-4	11-January-2010	2670	1460	490	140	4760	56	<50	133	920	<50
MW-6	11-January-2010	6380	7800	1520	100	15800	408	1140	296	1020	493
MW-7	11-January-2010	<20	<50	<100	<50	nd	<1	<2	<2	<2	<2
MW-8	11-January-2010	18400	2420	290	<50	21110	6050	5360	870	3110	1260
MW-9	11-January-2010	<20	<50	<100	<50	nd	<1	<2	<2	<2	<2
MW-10	11-January-2010	20	<50	<100	<50	20	<1	3	<2	2	<2
MW-11	11-January-2010	<20	<50	<100	<50	nd	<1	<2	<2	<2	<2
MW-12	11-January-2010	2080	800	270	<50	3150	<50	<50	67	748	<50
MW-13	11-January-2010	212000	93200	8530	<490	313730	2110	10400	3130	25400	10600
MW-14	11-January-2010	100	290	180	50	620	1	<2	5	5	<2
MW-15	11-January-2010	350	510	490	140	1490	6	<2	30	145	8
MW-16	11-January-2010	33600	45600	8850	790	86840	2580	1040	1360	7350	2770
MW-17	11-January-2010	Inaccessible at time of sampling due to vehicle being parked over well									
MW-18	11-January-2010	8030	650	550	280	9510	2390	740	274	1220	381
MW-20	11-January-2010	<20	<50	<100	<50	nd	<1	<2	<2	<2	<2
MW-22	11-January-2010	1810	60	340	240	2450	<50	210	<50	<100	<50
MW-24	11-January-2010	Well dry. Unable to be sampled									
MW-25	11-January-2010	720	12100	1090	100	14010	143	145	14	124	59
MW-26	11-January-2010	20	<50	<100	<50	20	2	<2	<2	<2	<2
MW-27	11-January-2010	1000	220	280	80	1580	526	<2	29	102	31
MW-28	11-January-2010	<20	<50	<100	<50	nd	<1	<2	<2	<2	<2
MW-29	11-January-2010	<20	<20	620	110	730	<1	<2	<2	<2	<2
MW-30	11-January-2010	<20	<50	220	120	340	<1	<2	<2	<2	<2
MW-31	11-January-2010	<20	<50	130	110	240	<1	<2	<2	<2	<2
MW-32	11-January-2010	60	<50	<100	<50	60	5	<2	<2	18	<2
MW-33	11-January-2010	<20	<50	250	120	370	<1	<2	<2	<2	<2
TW-1	11-January-2010	50	<50	480	720	1250	<1	<2	<2	<2	<2

Notes:

- Sample ID: MW# and TW-1 denotes a discrete groundwater sample obtained from a monitoring well;
- "<#" or "nd" indicates analyte not detected above laboratory Limit Of Reporting (LOR);
- ^ denotes that LOR is not applicable for summed totals of analyte groups;
- ug/L indicates milligrams of analyte per litre of water;
- Semi volatile analyte LORs were raised for samples MW-1 and MW-13 as dilution was required during laboratory analysis due to the presence of high concentrations of contaminants;
- Volatile analyte LORs were raised for samples MW-3, MW-4, MW-6 and MW-12 as dilution was required during laboratory analysis due to the presence of high concentrations of contaminants;
- Analytical results have not been compared to Site Specific Target Level (SSTL) criteria as none have yet been approved for this site. Upon approval of SSTLs this data may be compared to SSTL criteria; and
- ANZECC do not specify threshold concentrations for TPH compounds in waters. Where elevated TPH concentrations are detected, the results are assessed based on TPH concentrations and the relative ratio of TPH fractions present. Where TPH compounds are detected and oil or grease is the suspected source of the TPH, analysis of the sample for oil and grease may be warranted. The NSW Clean Waters Act 1970 and NSW Protection of the Environment Operations Act 1997 and associated regulations prohibit the pollution of waters by any grease or oil, although licensed discharges under the Clean Waters Act are required to be "visually free" of oil and grease. NSW EPA (1994) suggest that "visually free" is approximately equivalent to an oil and grease concentration of <10,000 ug/L.



01	21.01.10	ORIGINAL ISSUE	REM	SET	
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FAX (02) 9417 2314

PERTH
TEL (08) 9227 9000
FAX (08) 9227 9009

www.otek.com.au

SITE LAYOUT & MONITORING WELL LOCATIONS
MOBIL OIL AUSTRALIA, MAROOCHYDORE, QLD

SHEET SIZE: A3	DRAWN: REM	DATE: 21.01.10	CHECKED	APPROVED	FIG No:
REV: 01		DWG NAME: S209012F02			FIGURE 2

O'Connor Gary

From: Mack Dreyer [mdreyer@butlerpartners.com.au]
Sent: 11 January 2010 10:49 AM
To: Greg O'Brien
Subject: Sugar Road
Attachments: Maroochydore Recovery Data (2).xls

Greg

s.73 irrelevant information

Just to keep you in the loop I have asked Mobil/Otek to give me an update on progress at Sugar Road. It looks like I will be meeting with Otek and Mobil (including Melbourne based Mobil reps) on either the 3rd or 4th of Feb to get a complete rundown. In the mean time they have provided me with the information attached. I do not have the raw data to check the information provided but taking the data at face value the recoveries are substantial (to be honest the results look too big and if we were pulling this much mass out of the system I would have expected to have seen a lot more product on the site). In any event the system certainly appears to be pulling mass out of the site and appears to be a lot more effective than the old system.

If you have any questions give me a call. I will let you know how I go with this meeting in early February.

Regards

Mack

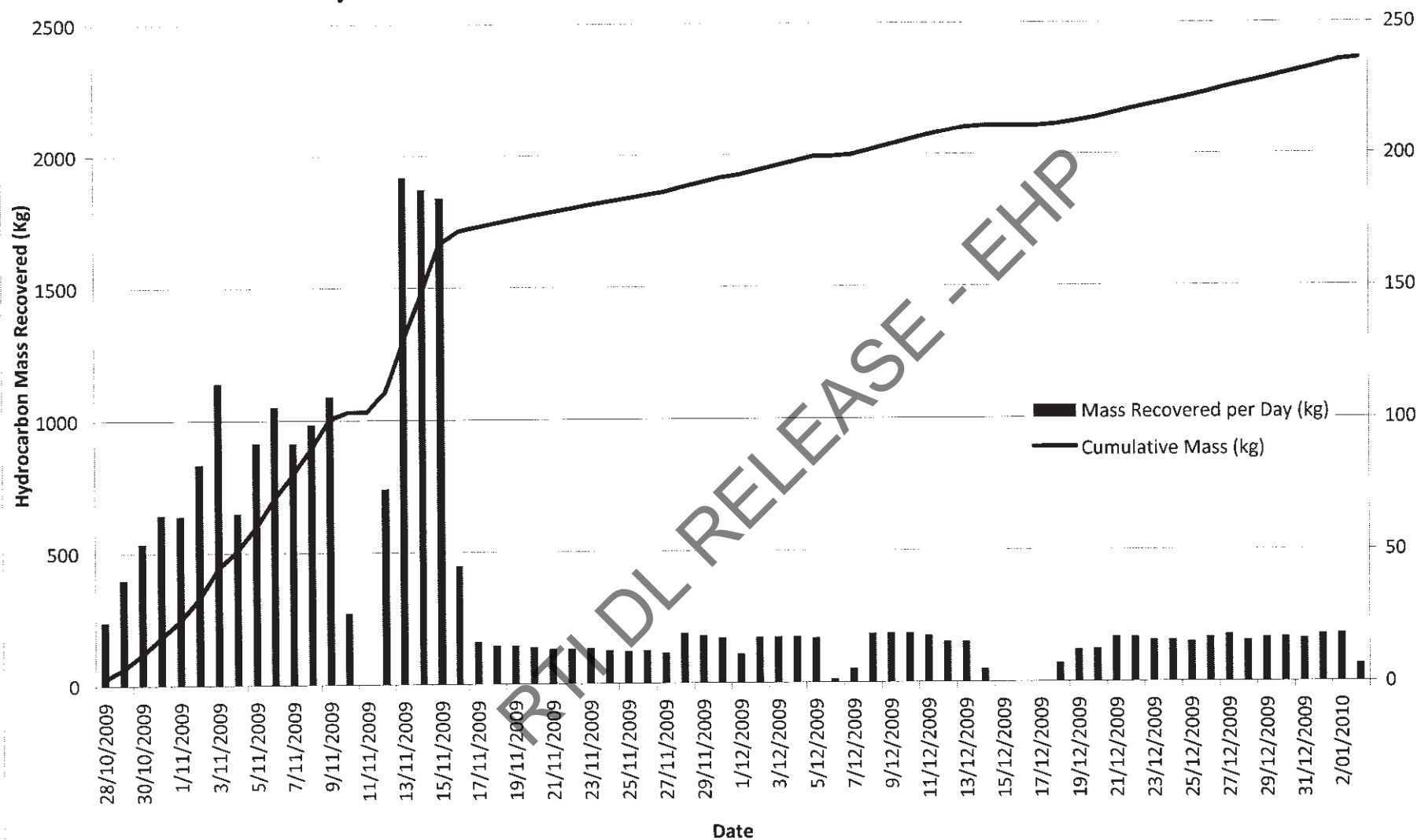


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Hydrocarbon Mass and Time (Mobil Maroochydore)



O'Connor Gary

From: Mack Dreyer [mdreyer@butlerpartners.com.au]

Sent: 28 October 2009 11:17 AM

To: Greg O'Brien

Subject: Maroochydhore

Greg

s.73 irrelevant information

Just as a bit of an update on the site inspection I did on Monday at Sugar Road:

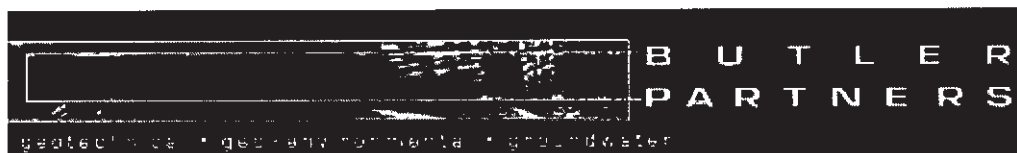
- The new MPE system was up and running and had been running since Saturday. The equipment appears to have adequate capacity for the job at hand (pumps etc).
- Since Saturday they had removed 16000 L of water.
- They were pulling vapour at 240 m3/hr.
- The vapour had started off at 99% LEL but by Monday was down to 30% LEL.
- OTEK are going to be doing maintenance twice a week for the first couple of weeks and then this will be reduced as the system settles down.
- They are looking at doing a targeted groundwater monitoring event at the end of November. I have advised them to sit down with me to work out what wells they will be monitoring and how they do it. I do have some concerns with the fact that most of the monitoring wells are hooked up to the MPE system and as a result we may not get reliable information.
- I have asked OTEK to keep me informed on what they do with the depth of the stingers down the wells.

Overall I think this system should be more effective in removing impact than the previous system, but I may not be as optimistic as OTEK are. Mobil/Otek have offered to show you the system if you want. I might do another inspection late November/early December when they are doing the GME.

Give me a call if you have any questions.

Regards

Mack



Mack Dreyer

Principal

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RTI DL RELEASE - EHP

O'Connor Gary

From: Mack Dreyer [mdreyer@butlerpartners.com.au]

Sent: 13 October 2009 11:35 AM

To: Greg O'Brien

Subject: Sugar Road Maroochydore

Greg

s.73 irrelevant information

I thought I would give you an update on the Sugar Road site.

Mobil have parted ways with Coffey on the site and the remediation system that was installed by Coffey has been decommissioned. Essentially the system was unreliable (the system was off line for large periods of time over recent years) and while no significant detections of PSH had been made over the site in recent years, the installed system was having very limited success in controlling the dissolved phase plume (the system really was designed to remove PSH).

OTEK were commissioned earlier in the year to run a MPE trial on the site. This was done in June and a report on the trial produced in August. While I am not necessarily a big supporter of MPE on dissolved phase plumes it does appear that the trial was moderately successful (and removed more hydrocarbon from the site in a few days than had been achieved for some time with the old system). Mobil subsequently engaged OTEK to install a permanent MPE system on the site. This system was delivered last week and was to be up and running by early this week. I am still waiting for a call back to see if this did happen.

The new MPE system hooks up to the previous system's groundwater extraction network and will also be pulling from a series of off-site wells.

Coffey completed a risk assessment s78B(2) - Substantial Harm to Entity This has been submitted to me and I have sent it on to Jackie Wright to review. I am expecting her comments back in the next couple of days.

Mobil are going up to do an audit on the site (Andrew Hunt is coming up from Melbourne) on Monday 26 October and I figured that this might be a good time to go up and see how the system was operating as there will be representatives there from both OTEK and Mobil. They should also have a couple of weeks worth of operating data so I should be able to get a feel for how the system is going. Do you want to come up and have a look at the site as well (I could give you a lift), not that there will be much to see but it will at least raise the flag and let them know that we are serious about getting this matter resolved one way or the other.

Regards

Mack



**Queensland
Government**

Enquiries Greg O'Brien
Telephone 32244514
Your reference DRH:DRH:VS:070684
Our reference BNE9848

Environmental Protection Agency

Incorporating the
Queensland Parks and Wildlife Service

13 March 2008

Donnie Harris
Roberts Nehmer McKee Lawyers
Level 1/111 Charters Towers road
Townsville Qld 4810

Dear Mr Harris

BEMEROO HOLDINGS PTY LTD, 120 SUGAR ROAD, ALEXANDRA HEADLAND

I refer to your letter faxed 28 February 2008 regarding negotiations to purchase the above property (the subject land).

The subject land has been impacted by an underground petroleum hydrocarbon fuel leak that occurred prior to 2003 on the adjacent service station site. The fuel leak has contaminated soil and groundwater on the service station site and on adjacent properties including the subject land.

In 2003 the Environmental Protection Agency (EPA) placed a Notice to remediate the site affected by contamination on Mobil Oil Australia under Section 391 of the Environmental Protection Act 1994. The Notice required, among other issues, remediation of the subject land to an extent that would enable its removal from the Contaminated Land Register (CLR).

After some access issues from the site lessee were resolved, a soil/vapour extraction (SVE) plant on the service station site was connected to a set of groundwater wells some of which are on the subject land. Other interception and remediation works were also undertaken. The SVE plant effectively places the grid of wells under vacuum drawing the petroleum contaminants and vapour into the plant for collection and treatment.

In order to enable the site businesses to keep operating, the wells were installed out of normal business hours. The SVE plant is able to run intermittently without interfering with the daily business activities on the affected lands.

While there has been progress in halting the spread of the contamination and for the SVE plant and natural biodegradation processes to remove and destroy contaminants, recent well sampling has shown that an unsatisfactory level of contamination remains in at least one well on the subject land. It can be inferred that the subject land is not satisfactorily decontaminated at this stage.

The extraction and treatment program will continue to operate until such time as the land can be removed from the EMR.

Decontamination programs of this type have varied success and typically require long time frames over some years to reach a satisfactory outcome. The EPA has appointed an independent Third Party Reviewer under the Notice requirements to oversee the work of the consultant engaged by Mobil to address the remediation. The EPA is waiting on an update report on recent monitoring of the site and overall progress with site remediation from the TPR which will assist with future direction on the overall remediation plan.

The EPA maintains the view that the site is to be restored under the terms of the Notice but is aware of the complexities in application of suitable remediation technology, the long remediation timeframes and the maintenance of daily business activities on the affected lands. At this point the EPA considers that the land can be used for industrial uses provided no subsurface excavation is undertaken by the site owner or lessee without EPA approval.

Please contact the undersigned should you require any additional information.

Yours sincerely

sch4p4 (6) Personal information

Greg O'Brien
Chief Scientific Advisor