

901564

☐ For Regional Information & Filing

☒ Regional Action Required

Admin. Office: Contaminated Land Unit, Southern Region

Project No: 347288

Client No: 648379

EMR/CLR ID No: 3350

Permit No: CLEA00747310

Ecoaccess Customer Service Unit

App No. 436810

CROW No. 34656

Application for Assessment of a Site Investigation Report (Contaminated Land) Checklist

CONTAMINATED
LAND SECTION

22 JUL 2010

49-Sch4 - Signature

Date Received:

06/07/10

Date Application Deemed Valid:

19/07/10

Due Date (20 Business Days
After Application Deemed
Valid):

Due Date for report that has had
a Third Party Review (5 Business
Days after received): This applies
to sites requesting removal from
the Register.

26/7/10

(If TPR recommends an SMP refer
to Contam Land ASAP!)

Due Date for Decision of IPA Application
(20 Business Days):

☒	Current application form Part A & Part B submitted and completed (Statutory requirement)
☒	Correct Fees Paid (Statutory requirement) (If no fees attached contact Project Director on 07 3225 1827 for clarification)
☒	Check Ecotrack to ensure there is no existing Development Application (IPA) or Disposal Permit
☒	Check QNTIME for current owner details
☒	Check EMR to see whether the site is listed. (If not, need Notification form).
☐	Check that the owner listed on the application form matches QNTIME (gazetted)
☒	Check current Registered Plans for all lots are included (Requirement of Guideline)
☒	Check Statutory declarations: (Statutory requirement) <ul style="list-style-type: none">- Investigator / report preparer has required qualifications and experience- Correct format- Owner- Applicant if required
☒	Firm Recommendations wrt EMR/CLR (Requirement of Guideline) eg: <ul style="list-style-type: none">Lot-on-Plan should be removed from the EMRLot-on-Plan to remain on register subject to a Site Management PlanLot-on-Plan to remain on EMR subject to further workLot-on-Plan to be deleted from EMR

Third Party Reviewer: MACH 1 Environmental

Applicant Name: Greynolds Ltd. Contact: Robin Wagland

Location: Lot 658/842298 (Slacks Creek) Coordinator: Kim C / Ria G

Receipt details: Fees correct ☒ N/A ☐

Receipt No: IN218862 Date: 16/07/10

Amount Paid \$ 1048.00

Receipt sent to client Yes ☒ No ☐

Payment Method:

Cheque ☐ EFT ☒ Cash ☐ Credit ☐

Cheque No:

Drawer (if other than the applicant):

COST CENTRE/CODE:

Added to Ecotrack + updated Crow - 21/7/10 - CAIL

Record of consultationApplicant name: Logan Greyhound Facility.

Date 14/7/10. 15/7/10. 16/7/10.	Person Contacted:	Robin Wagland.	Phone No:	3351 0468
	Information Requested:	No Forms provided (Parts A & B). Payment? \$1048 Lm 2 CB one email Forms.		
	Response:	Received all ab above.		
	Ecoaccess CSU Staff:	Ria.		

Date 16/7/10.	Person Contacted:	Andrew/Allen. (CUU)	Phone No:	
	Information Requested:	Forms state land gazetted to Logan S.C, however Smart Maps/Title searches states owner as DEIDI		
	Response:	Cannot accept application without DEIDI submitting this or giving their consent. (FHold) Call Robin on Monday. *Also Form A is incorrect type form.		
	Ecoaccess CSU Staff:	Ria.		

Date	Person Contacted:	Robin	Phone No:	
	Information Requested:	C.		
	Response:			
	Ecoaccess CSU Staff:			

Date	Person Contacted:		Phone No:	
	Information Requested:			
	Response:			
	Ecoaccess CSU Staff:			

Bring Up Details Report

347288 - All or part of the land is on the EMR or CLR/146-178 Kingston Road, Slacks Creek/Greyhounds Qld Ltd

Ref:	<input type="text" value="64270"/>	Created Date:	<input type="text" value="21-JUL-10"/>
Status:	<input type="text" value="Submitted"/>	Closed Date:	<input type="text"/>
Assigned To:	<input type="text" value="JOHNS, Allen"/>	Due Date:	<input type="text" value="23-JUL-10"/>
Email Address:	<input type="text" value="allen.johns@derm.qld.gov.au"/>	Reminder Date:	<input type="text"/>
Project Director:	<input type="text" value="BARRY, Kim"/>		
Project Manager:	<input type="text"/>		
CC:	<input type="text"/>		
CC:	<input type="text"/>		
Subject:	<input type="text" value="Application Number 436810"/>		



Comments: Project Number: 347288
 Permit Number: CLEA00747310
 TPR (If applicable): Mach 1 Environmental
 Client: Racing Queensland Limited
 Lot on Plan: Lot 658 on plan SL12298
 Location: Cronulla Park, Corner of Kingston and Compton Roads, Slacks Creek
 Report Title (if any): Third Party Reviewer Certification Report: Logan Greyhound Facility, Slacks Creek, Queensland (Lot 658 on Plan SL12298)
 Application Date: 19 JULY 2010

Dear Kim

An application has been received for an Assessment of Site Investigation Report. The application will be forwarded to the Contaminated Land Unit on the 21/07/10.

Regards, Gail Jacobson

RTI/DL RELEASE - EHP



Project Running Report

Date 12-APR-2010 Status Application Validation Decision Level 2

Veg Clearing - Op Work - AM

Locations

Name	Address Line 1	Address Line 2	Suburb	Postcode	State
146-178 Kingston Road, Slacks Creek					

Agency Interests/Ratings

Category	Type	Rating
Biodiversity	Biodiversity - rare and threatened species	Unknown (default)
Land	Land - erosion/stability	Unknown (default)
Biodiversity	Biodiversity - rare and threatened species	Unknown (default)

Permits: 2

Permit Ref	Permit Type	Status
SPCL00336210	Concurrence Response for a MCU involving contaminated land.	Assessment
SPCR00336310	Concurrence Response for a lot that is 2ha or larger.	Assessment

Date 19-JUL-2010 Status Assessment Decision Level 2

Primary Clients

Name	Address Line 1	Address Line 2	Suburb	Postcode	State
Racing Queensland Limited					

Primary Contact

Name	Contact Number
Racing Queensland Limited	07 3869 9739

Activities

Name
Assessment Of Site Investigation Report For Land On Emr/clr

Locations

Name	Address Line 1	Address Line 2	Suburb	Postcode	State
146-178 Kingston Road, Slacks Creek					

Agency Interests/Ratings

Category	Type	Rating
----------	------	--------

Permits: 1

Permit Ref	Permit Type	Status
CLEA00747310	Site Report Assessment for Land on the Environmental Management Register or Contaminated Land Register	Assessment

21/7/10

49-Sch4 - Signature

Receipt No. IN218862
Date 16-7-2010
Amount \$1048.00
Initials HB CRC DERM

RECEIVED
19 JUL 2010
PaLM

Application form — Part B

Environmental Protection Act 1994

Submission of a site investigation / validation report

This form asks for activity specific details in relation to an application under Sections 375 and 390 of the *Environmental Protection Act 1994* for an assessment of a site investigation/validation report. Please read the information sheets and any guidelines included with your application kit to understand the environmental management and conservation issues, policies and procedures that relate to the activities proposed.

Note: Your application must be accompanied by a General Details – Part A form.

1. Lodgement details

Complete this section only if form not lodged by applicant

NAME Jeremy Wicks	TELEPHONE 3026 7526
COMPANY/ORGANISATION Sinclair Knight Merz	
POSTAL ADDRESS PO Box 3848, South Brisbane Qld 4101	
EMAIL jwicks@skm.com.au	FACSIMILE 3026 7306

2. Site owner's details

An Agent's address is not acceptable.

NAME Crown Land (currently gazetted to Logan City Council)	TELEPHONE +61 7 3412 3412
POSTAL ADDRESS PO Box 3226, Logan City DC Qld 4114	FACSIMILE +61 7 3412 3444

3. Site details

If you require additional space, attach the information on a separate sheet marked "Site Details."

STREET ADDRESS Cronulla Park, Corner of Kingston and Compton Roads, Slacks Creek	
LOT(S) 658	PLAN(S) SL12298
LOCAL GOVERNMENT AUTHORITY Logan City Council	

Application form – Part B
Submission of a site investigation / validation report

NOTIFIABLE ACTIVITY/POSSIBLE CONTAMINATING ACTIVITY Landfill	
CURRENT LAND USE Local Government (Entertainment and Recreation)	PROPOSED LAND USE Greyhound Racing Facility
STREET ADDRESS	
LOT(S)	PLAN(S)
LOCAL GOVERNMENT AUTHORITY	
NOTIFIABLE ACTIVITY/POSSIBLE CONTAMINATING ACTIVITY	
CURRENT LAND USE	PROPOSED LAND USE

4. Details of report

4.1 Is a development application pending under the Sustainable Planning Act 2009?

☐ NO

☒ YES

4.2 The attached report contains (as per the Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland May 1998)

☒ Stage 1 and Stage 2 investigation

☐ Stage 3 and Stage 4 remediation and validation report

If previous submissions have been made quote:
Ref no. _____

5. Payment

The applicable fee¹ of \$ 1048.00

☐ is enclosed with this application (cheque, money order etc.); or

☐ was paid by electronic funds transfer (EFT) on _____; and

☐ details required in the information sheet *Electronically paying fees to the Department of Environment and Resource Management (DERM)* were included.

The payment was for:

☐ this application only and the EFT identification code is: _____ / _____; or

☐ this and other applications. A payment notification (from the final page of the information sheet *Electronically paying fees to the Department of Environment and Resource Management (DERM)*²) was

¹ The fee is \$466.60 per lot where the land is used exclusively for residential purposes and is not the subject of a development application. For any other lot the fee is \$1048 per lot.

Application form – Part B Submission of a site investigation / validation report

sent to DERM and a copy is attached.

Note: An incomplete application (including applications that do not include the fee, or sufficient detail to show that the fee has been paid where fees are paid by EFT) may be invalid. Invalid applications will be returned without processing and will only be processed if resubmitted with all invalidating issues addressed.

6. Applicant checklist

- ☒ Application form(s) completed and signed.
- ☒ Permit fees paid or enclosed (if applicable).
- ☒ Enclosed statutory declarations by investigators, preparers and owners as per Section 383 of the *EP Act*. Note: It is an offence under s480 of the EP Act to give to the administering authority or an authorised person a document containing information that you know is false, misleading or incomplete in a material particular.
- ☒ Enclosed signed consultant's report (as per Guidelines for the Assessment and Management of Contaminated Land in Queensland).
- ☒ Enclosed legible copy/copies of proof of ownership of site/s clearly showing the full name(s) of the registered proprietor(s) e.g. current certificates of Title or Title Searches.
- ☒ Enclosed legible copy/copies of all relevant registered plans (available from the Titles Section, Department of Environment and Resource Management) clearly showing location of the site/s and current registered plan details.
- ☒ Enclosed copy of a street map/area map clearly showing location of property.

Please return your completed application kit to:

Permit and Licence Management
Implementation and Support Unit
Department of Environment and Resource Management
GPO Box 2454
Brisbane Queensland 4001

Enquiries: **1300 130 372**
Facsimile: (07) 3896 3342
palm@derm.qld.gov.au

Office use only	
Account code	WFZYNBCO01/43311

² Available at www.derm.qld.gov.au or through the Permit and Licence Management (phone 1300 130 372).

DEPARTMENT OF ENVIRONMENT AND RESOURCE MANAGEMENT

Receipt No.
Date 16-7-2010
Amount \$1048.00
Initials HB CRL DERM

Application form Contact and Land Details Part A

CONTAMINATED
LAND SECTION
22 JUL 2010

Application form requirements

1. **Part A:** Contact and land details will need to be completed.
2. **Part B:** Application specific form will need to be completed.
3. Payment of the prescribed application fee, if relevant. A refund of application fees will not be given. (Details of fees are available on the Department of Environment and Resource Management (DERM) website or from a regional DERM office)
4. All parts of this application form need to be completed accurately, otherwise your application may be returned to you to complete.

Important information

All applications will be processed having regard to the requirements of the *Land Act 1994* and related legislation, approved policies and procedures and the requirements of all other agencies with an interest in the land.

Preferably applications should be lodged in the Department of Environment and Resource Management (DERM) regional office nearest to which the land is located. If this is not possible applications may be lodged at your nearest DERM office.

In terms of the Freedom of Information Act interested parties may seek access to DERM records and view relevant documents.

Information on this form, and any attachments, is being collected to process and assess your application under the *Land Act 1994*. The consideration of your application may involve consultation, and if so details of your application may be disclosed to third parties. They will not be otherwise disclosed outside the department unless required or authorised by law.

Contact details

Lodger Details and Mailing Address

A lodger is only required when a solicitor, bank, consultant etc lodges the application on behalf of the applicant.

Full Name / Company Name

Jeremy Wicks / Sinclair Knight Merz

Postal Address

PO Box 3848, South Brisbane Qld 4101

Phone number

3026 7526

Mobile phone

49-Sch4 - Mobile phone

Email

jwicks@skm.com.au

Fax

3026 7306

Applicant(s) Details and Mailing Address

If the applicant is a Corporation, either the Australian Company number, Australian Registered Body number or the Australian Business number must be shown.

Full Name / Company Name

Racing Queensland Limited

If a Corporation then record ☐ ACN ☐ ARBN ☒ ABN 52 142 786 874

Postal Address

PO Box 63 Sandgate QLD 4017

Phone number

3869 9739

Mobile phone

49-Sch4 - Mobile phone

Email

dbeavis@racingqueensland.com.au

Fax

3269 6404

Future correspondence should be sent to



Lodger



Applicant

Details of land for which the application is being lodged

1. Select the type of land for which the application is being lodged.
- ☐ Permit
- ☐ Lease
- ☐ Licence
- ☒ Trust Land Reserve/Deed of Grant in Trust (DOGIT)
- ☐ Road
- ☐ Unallocated State Land (USL) **go to 2**

2. Enter the description of the land for which the application is being lodged. If this application concerns a road, enter the description of the land adjoining the road.

Schedule 1		
You must enter either the Lot on Plan or Title Reference of the land for which the application is being lodged.		
Lot	Plan	Title Reference
658	SL12298	
The details of the land can be found on a current copy of the Title or on your rates notice. If insufficient space, please add additional description as an attachment.		

go to 3

3. Enter additional details of the land

Dealing number

Tenure type

Crown Land

Tenure number

Local Government

Logan City Council

Other details of land location (optional)

THIS FORM MUST BE ACCOMPANIED BY THE RELEVANT PART B APPLICATION FORM.

INTERNAL CURRENT TITLE SEARCH
ENVIRONMENT AND RESOURCE MANAGEMENT, QUEENSLAND

Search Date: 16/07/2010 15:44

Title Reference: 50809734
Date Created: 07/05/2010

Previous Title: 40060275

REGISTERED OWNER

Dealing No: 713218226 07/05/2010

THE STATE OF QUEENSLAND

(REPRESENTED BY DEPARTMENT OF EMPLOYMENT, ECONOMIC
DEVELOPMENT AND INNOVATION)

ESTATE AND LAND

Estate in Fee Simple

LOT 658 CROWN PLAN SL12298

County of STANLEY

Parish of YEERONGPILLY

Local Government: LOGAN

EASEMENTS, ENCUMBRANCES AND INTERESTS

1. Rights and interests reserved to the Crown by
Deed of Grant No. 40060275 (Lot 658 on CP SL12298)

ADMINISTRATIVE ADVICES - NIL

UNREGISTERED DEALINGS - NIL

CERTIFICATE OF TITLE ISSUED - No

** End of Current Title Search **



[-] Search

Profile
Find/Locate

Admin Area
Imagery
Notings
Place Names
Survey Marks
Survey Plans

[-] Mapping

Profile
Settings
[-] Data Suppression
Area By Filter
Area By Scale
Survey Mark Filter

[-] Map Suppression

Layers
User Defined

Shading
Define Area
Build Map
Refresh Map
Export SmartMap

[+] Other Services

[+] Admin

Hide Keymap

Spatial Search Results for Lot 658 on Plan SL12298

[Search Imagery at Point](#)

[Survey Search on selected plan\(s\)](#)

Lot/Plan	658/SL12298
Segment/Parcel:	20984/16
Tenure:	FH - FREEHOLD
Area:	10.2400 ha
Excluded Area:	0.00 m ²
Surveyed:	Yes
Coverage:	Base
Accuracy:	STANDARD 1:2500 CADASTRAL MAP - 1.5M
Locality:	SLACKS CREEK
Local Government:	LOGAN CITY
Address:	146-178 KINGSTON ROAD ,SLACKS CREEK

[Retrieve Plan Image](#)

[Display additional data](#)

[Current Title Search](#)

[Build Map](#)

Feature Name:	LOGAN PARK
Locality:	SLACKS CREEK
Local Government:	LOGAN CITY
Segment/Parcel:	20984/16

RTI DL RELEASE - EHP

FOR INTERNAL USE ONLY

**DEPARTMENT OF ENVIRONMENT AND RESOURCE
MANAGEMENT**

SEARCH RESPONSE

**ENVIRONMENTAL MANAGEMENT REGISTER (EMR)
CONTAMINATED LAND REGISTER (CLR)**

Transaction ID: 1241941 EMR Site Id: 3350 16 July 2010
This response relates to a search request received for the site:
Lot: 658 Plan: SL12298

EMR RESULT

The above site IS included on the Environmental Management Register.

Lot: 658 Plan: SL12298
Address: 146-178 KINGSTON RD
SLACKS CREEK 4127

The site has been subject to the following Notifiable Activity pursuant to section 374 of the
Environmental Protection Act 1994.

LANDFILL - disposing of waste (excluding inert construction and demolition waste).

CLR RESULT

The above site is NOT included on the Contaminated Land Register.

ADDITIONAL ADVICE

EMR/CLR Searches may be conducted online through the State Government Website
www.smartservice.qld.gov.au or Citec Confirm www.confirm.com.au.

If you have any queries in relation to this search please phone (07) 3330 5687.

Lindi Bowen
Registrar, Contaminated Land Unit

To execute a new search, select the "Back" button on the browser twice

Application form
Contact and Land Details
Part A

Application form requirements

1. **Part A:** Contact and land details will need to be completed.
2. **Part B:** Application specific form will need to be completed.
3. Payment of the prescribed application fee, if relevant. A refund of application fees will not be given. (Details of fees are available on the Department of Environment and Resource Management (DERM) website or from a regional DERM office)
4. All parts of this application form need to be completed accurately, otherwise your application may be returned to you to complete.

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Lodger Details and Mailing Address

A lodger is only required when a solicitor, bank, consultant etc lodges the application on behalf of the applicant.

Full Name / Company Name	
Jeremy Wicks / Sinclair Knight Merz	
Postal Address	PO Box 3848, South Brisbane Qld 4101
Phone number	3026 7526
Mobile phone	49-Sch4 - Mobile phone
Email	jwicks@skm.com.au
Fax	3026 7306

Applicant(s) Details and Mailing Address

If the applicant is a Corporation, either the Australian Company number, Australian Registered Body number or the Australian Business number must be shown.

Full Name / Company Name	
Racing Queensland Limited	
If a Corporation then record ☐ ACN ☐ ARBN ☒ ABN	52 142 786 874
Postal Address	PO Box 63 Sandgate QLD 4017
Phone number	3869 9739
Mobile phone	49-Sch4 - Mobile phone
Email	dbeavis@racingqueensland.com.au
Fax	3269 6404

Future correspondence should be sent to



Lodger



Applicant

Application form — Part B

Environmental Protection Act 1994

Submission of a site investigation / validation report

This form asks for activity specific details in relation to an application under Sections 375 and 390 of the *Environmental Protection Act 1994* for an assessment of a site investigation/validation report. Please read the information sheets and any guidelines included with your application kit to understand the environmental management and conservation issues, policies and procedures that relate to the activities proposed.

Note: Your application must be accompanied by a General Details – Part A form.

1. Lodgement details

Complete this section only if form not lodged by applicant

NAME Jeremy Wicks	TELEPHONE 3026 7528
COMPANY/ORGANISATION Sinclair Knight Merz	
POSTAL ADDRESS PO Box 3848, South Brisbane Qld 4101	
EMAIL jwicks@skm.com.au	FACSIMILE 3026 7306

2. Site owner's details

An Agent's address is not acceptable.

NAME Crown Land (currently gazetted to Logan City Council)	TELEPHONE +61 7 3412 3412
POSTAL ADDRESS PO Box 3226, Logan City DC Qld 4114	FACSIMILE +61 7 3412 3444

3. Site details

If you require additional space, attach the information on a separate sheet marked "Site Details."

STREET ADDRESS Cronulla Park, Corner of Kingston and Compton Roads, Slacks Creek	
LOT(S) 658	PLAN(S) SL12298
LOCAL GOVERNMENT AUTHORITY Logan City Council	

Application form – Part B
Submission of a site investigation / validation report

NOTIFIABLE ACTIVITY/POSSIBLE CONTAMINATING ACTIVITY Landfill	
CURRENT LAND USE Local Government (Entertainment and Recreation)	PROPOSED LAND USE Greyhound Racing Facility
STREET ADDRESS	
LOT(S)	PLAN(S)
LOCAL GOVERNMENT AUTHORITY	
NOTIFIABLE ACTIVITY/POSSIBLE CONTAMINATING ACTIVITY	
CURRENT LAND USE	PROPOSED LAND USE

4. Details of report

4.1 Is a development application pending under the *Sustainable Planning Act 2009*?

☐ NO

☒ YES

4.2 The attached report contains (as per the *Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland May 1998*)

☒ Stage 1 and Stage 2 investigation

☐ Stage 3 and Stage 4 remediation and validation report

If previous submissions have been made quote:
Ref no. _____

5. Payment

The applicable fee¹ of \$ 1048.00

☐ is enclosed with this application (cheque, money order etc.); or

☐ was paid by electronic funds transfer (EFT) on _____; and

☐ details required in the information sheet *Electronically paying fees to the Department of Environment and Resource Management (DERM)* were included.

The payment was for:

☐ this application only and the EFT identification code is: _____ / _____; or

☐ this and other applications. A payment notification (from the final page of the information sheet *Electronically paying fees to the Department of Environment and Resource Management (DERM)*²) was

¹ The fee is \$466.60 per lot where the land is used exclusively for residential purposes and is not the subject of a development application. For any other lot the fee is \$1048 per lot.

Application form – Part B

Submission of a site investigation / validation report

sent to DERM and a copy is attached.

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- ☒ Enclosed legible copy/copies of proof of ownership of site/s clearly showing the full name(s) of the registered proprietor(s) e.g. current certificates of Title or Title Searches.
- ☒ Enclosed legible copy/copies of all relevant registered plans (available from the Titles Section, Department of Environment and Resource Management) clearly showing location of the site/s and current registered plan details.
- ☒ Enclosed copy of a street map/area map clearly showing location of property.

Please return your completed application kit to:

Permit and Licence Management
Implementation and Support Unit
Department of Environment and Resource Management
GPO Box 2454
Brisbane Queensland 4001

Enquiries: **1300 130 372**
Facsimile: (07) 3896 3342
palm@derm.qld.gov.au

Office use only	
Account code	WFZYNBC001/43311

² Available at www.derm.qld.gov.au or through the Permit and Licence Management (phone 1300 130 372).

..
Dept. of Environment and Resource M'ment
Customer Service Centre
160 Ann Street Brisbane
ABN 46 640 294 485

TAX INVOICE ABN 87 221 158 786
Invoice No. Date Time
IN218862 16/07/10 14:01:19

0706 Cont Land Repor 1 1,048.00

Total Amount Incl GST 1,048.00

Payment Amount 1,048.00
Change 0.00

GST Amount 0.00

* indicates taxable supply.

Thank-you for visiting
EPA Customer Service Centre.
Please come again.

RTI DL RELEASED EHP

DEPARTMENT OF ENVIRONMENT AND RESOURCE MANAGEMENT

Application form Contact and Land Details Part A

16-7-2010
\$1048
HB CEC/DERM

Application form requirements

1. **Part A:** Contact and land details will need to be completed.
2. **Part B:** Application specific form will need to be completed.
3. Payment of the prescribed application fee, if relevant. A refund of application fees will not be given. (Details of fees are available on the Department of Environment and Resource Management (DERM) website or from a regional DERM office)
4. All parts of this application form need to be completed accurately, otherwise your application may be returned to you to complete.

Important information

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IN218862
16-7-2010
\$1048.00
HB CRC DERM

Application form — Part B

Environmental Protection Act 1994

Submission of a site investigation/validation report

This form asks for activity specific details in relation to an application under Sections 375 and 390 of the *Environmental Protection Act 1994* for an assessment of a site investigation/validation report. Please read the information sheets and any guidelines included with your application kit to understand the environmental management and conservation issues, policies and procedures that relate to the activities proposed.

Note: Your application must be accompanied by a General Details – Part A form.

1. Lodgement details

Complete this section only if form not lodged by applicant

NAME Jeremy Wicks	TELEPHONE 3026 7526
COMPANY/ORGANISATION Sinclair Knight Merz	
POSTAL ADDRESS PO Box 3848, South Brisbane Qld 4101	
EMAIL jwicks@skm.com.au	FACSIMILE 3026 7306

2. Site owner's details

An Agent's address is not acceptable.

NAME Crown Land (currently gazetted to Logan City Council)	TELEPHONE +61 7 3412 3412
POSTAL ADDRESS PO Box 3226, Logan City DC Qld 4114	FACSIMILE +61 7 3412 3444

3. Site details

If you require additional space, attach the information on a separate sheet marked "Site Details."

STREET ADDRESS Cronulla Park, Corner of Kingston and Compton Roads, Slacks Creek	
LOT(S) 658	PLAN(S) SL12298
LOCAL GOVERNMENT AUTHORITY Logan City Council	

Details of land for which the application is being lodged

1. Select the type of land for which the application is being lodged.
- ☐ Permit
- ☐ Lease
- ☐ Licence
- ☒ Trust Land Reserve/Deed of Grant in Trust (DOGIT)
- ☐ Road
- ☐ Unallocated State Land (USL) **go to 2**

2. Enter the description of the land for which the application is being lodged. If this application concerns a road, enter the description of the land adjoining the road.

Schedule 1		
You must enter either the Lot on Plan or Title Reference of the land for which the application is being lodged.		
Lot	Plan	Title Reference
658	SL12298	
The details of the land can be found on a current copy of the Title or on your rates notice. If insufficient space, please add additional description as an attachment.		

go to 3

3. Enter additional details of the land

Dealing number

Tenure type

Crown Land

Tenure number

Local Government

Logan City Council

Other details of land location (optional)

THIS FORM MUST BE ACCOMPANIED BY THE RELEVANT PART B APPLICATION FORM.

MACH1 Environmental Pty Ltd

Greyhounds Queensland Limited, Cronulla Park
TPR Certification Report

RECEIVED
06 JUL 2010
PaLM

Greyhounds Queensland Limited

Third Party Reviewer Certification Report:
Logan Greyhound Facility, Slacks Creek,
Queensland (Lot 658 on Plan SL12298)

Prepared by: MACH1 ENVIRONMENTAL PTY LTD

JUNE 2010

REPORT NO: 09-002-017 RP1



Originally rec'd this
date + redirected to
PaLM.

STATUTORY DECLARATION



Address of Site Investigated: Corner Compton Road and Kingston Road,
Slacks Creek, QLD 4127.
Real Property Description: Lot 658 on SL12298.
Title of Report: Third Party Reviewer Certification Report:
Logan Greyhound Facility, Slacks Creek,
Queensland (Lot 658 on SL12298) June 2010.

I, Robin Wagland, of MACH1 Environmental Pty Ltd (Ferny Hills, QLD 4055) in the State of Queensland, do solemnly and sincerely declare that:

1. I was the Third Party Reviewer appointed by the Queensland Government Department of Environment and Resources, Contaminated Land Unit for the Slacks Creek site described above.
2. Information was collected and collated by Sinclair Knight Merz Pty Ltd in their report titled: - *Logan Greyhound Facility, Cronulla Park, Contaminated Site Investigation*, dated June 2010, Report No. QE09537.
3. I am a member of the Environment Institute of Australia and New Zealand and my qualifications and experience (submitted previously to the DERM) are relevant to this investigation.
4. I have not knowingly included any false, misleading or incomplete information in the report.
5. I certify that the site has been assessed to a standard such that the health and environmental risks associated with the contamination at the site have been assessed.
6. I certify that the site (Lot 658 on SL12298) should remain on the Environmental Management Register (EMR).

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

Signature 49-Sch4 - Signature

Name *Robin M Wagland*

Taken and declared before me at *Kippa* this *30th* day of *JUNE* 2010

Witness (Justice of the Peace/Commissioner for Declarations/Solicitor) *m*

Signature 49-Sch4 - Signature

Name *Deborah Tetty*



Statutory declaration

Environmental Operations

Environmental evaluation

In accordance with section 325 of the Environmental Protection Act 1994, this statutory declaration must be completed by the recipient of a Notice to conduct or commission an environmental evaluation. A copy of the environmental report must be attached to this statutory declaration.

Oaths Act 1867

QUEENSLAND
TO WIT

I Richard Alan Graham
Insert the name of the person making this declaration
of Sinclair Knight Merz Pty Ltd, 32 Cordelia Street, South Brisbane Qld 4101
Insert the street address of the person making this declaration

in the State of Queensland do solemnly and sincerely declare that in accordance with section 325 of the *Environmental Protection Act 1994*, I have:

- not knowingly given any false or misleading information; and
- given all relevant information

to the auditor/investigator who, over the period 16/03/2009 to 24/06/2010, conducted:
Insert start date Insert end date

(tick applicable box)

- ☐ the environmental audit, or
☒ environmental investigation

for the purpose of submitting a report in accordance with the *Notice to conduct or commission an environmental evaluation* pursuant to section 324 of the *Environmental Protection Act 1994* issued by the administering authority to:

Greyhounds Queensland Ltd

Insert name of recipient of the notice

12 May 2010

Insert date of the notice

A copy of my report is attached to this statutory declaration and marked "A".

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



**Statutory declaration
In relation to an application**

Taken and declared before me,
at

Armadale Victoria

Insert location

this

24th

day of

June

in the year

2010

Insert day (e.g. 18th)

Insert month

Insert year

49-Sch4 - Signature

49-Sch4 - Signature

Signed

Signed

(Person making this declaration)

(Delete whichever is not applicable — Justice of the Peace
/ Commissioner for Declarations / Solicitor / Barrister)

DOMENIC A. CIANCIO
590 Orrong Rd Armadale 3143
An Australian Legal Practitioner
within the meaning of the
Legal Profession Act 2004

Printed name and registration number (if applicable)

RTI DL RELEASE - EHP

MACH1 Environmental Pty Ltd

Greyhounds Queensland Limited, Cronulla Park
TPR Certification Report

Greyhounds Queensland Limited

Third Party Reviewer Certification Report:

**Logan Greyhound Facility, Slacks Creek,
Queensland (Lot 658 on Plan SL12298)**

RTI DL RELEASE - EHP

RECEIVED
06 JUL 2010
PaLM



Prepared by: *Robin Wagland*
Role: Third Party Reviewer
Signed:

49-Sch4 - Signature

Date: 30 June 2010



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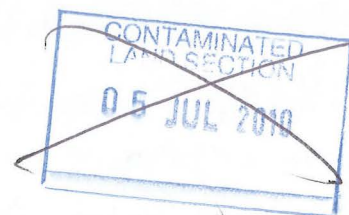
Appendix A - DERM Letter of Approval

Appendix B – TPR Statutory Declaration

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1 INTRODUCTION

MACH1 Environmental Pty Ltd (MACH1) was commissioned by Greyhounds Queensland Limited (GQL) to undertake the Third Party Reviewer (TPR) role for the Contaminated Site Investigation (CSI) of a property contained within Lot 658 on Plan SL12298, located at the corner of Compton Road and Kingston Road, Slacks Creek, Queensland, herein called the site. This appointment was in accordance with the Queensland Government Department of Environment and Resources (DERM) or formerly the Environmental Protection Agency (EPA) Terms of Reference¹.

The Contaminated Land Practitioner Group (CLPG) for the CSI was Sinclair Knight Merz Pty Ltd (SKM). SKM completed the CSI in May 2010 with the final dated June 2010, Reference No.QE9537.

This Certification Report has been prepared to meet the requirements of DERM to allow certification of the work by the TPR. Mr Robin Wagland of MACH1 was approved as the TPR for the site by DERM. This was confirmed in the DERM letter dated 18 June 2010, which is included in **Appendix A**.

The certification process included a review of the SKM CSI report. A précis of the report has been provided with TPR comments.

This TPR certification report also includes a summary of the outcomes of the TPR inspections/meetings on site dated 17th April and 31st July 2009 and TPR correspondence. The information forms part of the final TPR summary Certification report and is accompanied by a statutory declaration, a copy of which is provided in **Appendix B**.

¹ Terms of Reference for Use of a Third Party Reviewer (TPR) for assessment and management of site contamination. Final Version 8B DG. Approved 15/02/08.

2 SCOPE OF WORK

The scope of work for the TPR was as follows:

- DERM TPR application;
- Meetings with GQL, ML Design, SKM and various contractors;
- Site visit and meeting with SKM to confirm previous site information and verify current site conditions;
- Review of the SKM Sampling and Analysis Plan dated April 2009;
- TPR review of the SKM Interim Summary Report dated July 2009;
- Provision of comments for the above report;
- TPR review of the SKM Contaminated Site Investigation report (May 2010);
- Provision of comments for this report;
- Production of a TPR Certification Report.

The work was undertaken in accordance with the MACH1 proposal reference 09-001-017 dated 06 November 2009.

RTI DL RELEASE - EHP

3 PRÉCIS OF SKM WORK

The following sections outline some of the key findings of the review process.

3.1 INTRODUCTION

GQL is planning the development of the Logan Greyhound Facility at Cronulla Park, Slacks Creek. Cronulla Park was formerly used a landfill between the 1970s and 1980s. GQL engaged SKM to undertake a Stage 1 and Stage 2 CSI of the site.

Information obtained from the DERM stated that the site is listed on the Environmental Management Register (EMR) for the notifiable activity: "Landfill". The site is not listed on the Contaminated Land Register (CLR).

The stated aims of the SKM CSI Report were to establish:

- whether the site in its current condition poses an unacceptable risk to human health and/or the receiving environment; and
- whether remediation will be required to enable the site to be used for a commercial land use (greyhound racing facility), and if so, the required remedial measures.

The stated primary objectives of the SKM CSI Report were:

- to investigate the quality of groundwater entering and exiting the site, and whether the groundwater exiting the site poses an unacceptable risk to the receiving environment;
- to investigate the presence of groundwater underlying the site, and whether the site is likely to pose an unacceptable risk to this aquifer;
- to investigate the risk to human health from the material used in the capping of the site, and the permeability of this material;
- to investigate the concentration of landfill gas in shallow ground deposits on the periphery of the landfill; and
- to investigate the risk to human health from shallow ground conditions (<0.3 m below ground level or bgl).

The CSI works were conducted in accordance with the following guidelines:

- Australian and New Zealand Environment and Conservation Council/National Health and Medical Research Council (1992): Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites;
- Department of Environment May (1998): Draft Guidelines for the Assessment and management of Contaminated Land in Queensland;
- National Environment Protection (Assessment of Site Contamination) Measure 1999; and
- Standards Australia, (2005): Australian Standard, Guide to the investigation and sampling of sites with potentially contaminated soil. Part 1: Non-volatile and semi-volatile compounds. AS4482.1 – 2005.

- Australian and New Zealand Environment and Conservation Council (ANZECC) and Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) 2000, Australian and New Zealand Water Quality Guidelines for Fresh and Marine Waters ("ANZECC Guideline").
- The Netherlands Ministry of Housing, Spatial Planning and Environment's *Circular on target values and intervention values for soil remediation* (2000) ("the Dutch Guidelines") which consider both the risk to human health and the environment;
- The National Health and Medical Research Council (2004) *Australian Drinking Water Guidelines* ("the Australian Drinking Water Guidelines"); and
- United States Environmental Protection Agency (2009) *Region 9 Preliminary Remediation Goals* ("the USEPA guidelines").

3.2 LOCATION AND PROPERTY DESCRIPTION

The site is identified as Lot 658 on Plan SL12298 and is located at the corner of Compton Road and Kingston Road, Slacks Creek, Queensland. The site has an approximate area of 10.24 hectares (ha) and is held in trust by Logan City Council (LCC). The designated purpose of the site is local government (entertainment and recreation).

The property is located within an area predominated by light industrial and commercial properties. There are a number of land uses within the direct vicinity of the site with the potential to cause contamination, these include, service stations, auto repair workshops and an air-conditioner workshop.

Following closure of the landfill, the site has been used for open space recreational purposes by the general public, such as bike riding, and dog walking.

3.3 REGIONAL GEOLOGY AND HYDROGEOLOGY

The regional geology of the site is described in the Beenleigh area as: alluvium soils, mainly clay, silt and gravel overlaying shale, siltstone and sandstone (with possible coal seams). The regional geology is part of the tertiary Oxley Group, a subset of the early tertiary continental basins of the area.

A review of the Groundwater Resources Map of Queensland (1987) indicates that regional groundwater yield is hosted in sedimentary strata and is expected to be less than 5 L/sec. The total dissolved solids (TDS) in groundwater is generally within the range of 500-1500 mg/L, and is suitable for domestic applications (e.g. potable water, recreation, irrigation) and stock watering. Based on topography groundwater flow direction across the site is expected to be northeast towards Slacks Creek.

A search of the DERM groundwater bore records indicates that there are no registered operational bores (groundwater users) in the vicinity of the site. The closest operational registered bore is approximately 0.7 km north of the site (registration number – 134259). This bore is sub-artesian and although registered as a potable water source, notes on the bore card indicate that it supplies water for garden irrigation only. The screened interval of this bore is between 8 m bgl and 30 m bgl.

3.4 SUMMARY OF SITE HISTORY

CMPS&F Environmental completed a *Preliminary Site Investigation and Management Plan for The Former Compton Road Landfill Site* in 1995 which states that the site was used as a municipal landfill from the 1970s to 1983. This is consistent with historical aerial photography which shows the site in use as a landfill during this time period. Prior to the use of the site as a landfill in the 1970s, the site was vegetated and undeveloped.

A tributary of Slacks Creek historically ran through site. Prior to the commencement of the construction of the landfill, the tributary was diverted around the site in an open drain located on the southern and eastern boundary of the site.

The landfill was formed using a method which involved the excavation of trenches, and then the placement and compaction of wastes within each trench. The quantity of waste received at the site is not known. The maximum depth of waste was said to be 4 m in the CMPS&F Report. The investigation however found the depth of waste to be up to approximately 10 m below ground level (mbgl), and waste has been placed directly over natural ground strata including weathered sandstone, and sandstone.

Based on the CMPS&F Report, it is understood that the construction of the landfill did not include the installation of a liner or leachate and landfill gas collection system. This was confirmed during the undertaking of the investigation.

Based on the CMPS&F Report, wastes which were accepted at the landfill included:

- domestic waste;
- commercial and light industrial solid waste;
- sanitary solid waste; and
- construction and demolition waste.

The landfill may have also received asbestos and hazardous domestic wastes (e.g. paints and pesticides). The landfill received approximately 2,000 to 3,000 animal carcasses including dogs, cats, cows and horses. The landfill was capped using a clay based soil.

The TPR comments on the site history and desktop study are summarised as follows:

- The site characterisation undertaken by SKM was adequate to identify any historical potentially contaminating activities as well as to inform the further intrusive investigations and soil sampling.
- The TPR conducted a site inspection to confirm the details of the site history investigations.

3.5 CONTAMINANTS OF CONCERN AND SCOPE OF INVESTIGATION

Based on the site history and previous investigations of the site, potential contaminants of concern include the following:

- A broad range of metals (including arsenic, cadmium, chromium, nickel, lead, and zinc) associated with a range of materials potentially disposed at the site.
- Ammonia and other landfill leachate products formed during the decomposition of organic materials (e.g. fatty acids).
- Organochlorine/organophosphate pesticides (OCP/OPP) discarded as agricultural wastes.
- Volatile or semi-volatile organic compounds (VOCs/SVOCs), including polycyclic aromatic hydrocarbons (PAHs), associated with the disposal of lubricants, paints, oils and fumigants; and the burning of various wastes.
- Total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene and xylenes (BTEX compounds) associated with the disposal of fuels, lubricants and oils.
- Polychlorinated biphenyls (PCBs) associated with transformers, refrigerants and fluorescent lighting.
- Asbestos containing materials (ACM) such as fibrous sheeting.

The scope of the on-site investigations comprised:

- the undertaking of a groundwater monitoring event from monitoring wells present at the site, and the collection of a water sample from the drain exiting the site.
- the preparation of a Sampling and Analysis Plan (SAP) for the undertaking of further intrusive ground investigation to establish whether the site in its current condition poses an unacceptable risk to human health and/or the receiving environment.
- the installation and development of nine groundwater monitoring wells around the periphery of the site, including a total of five combined shallow groundwater/landfill gas wells intersecting the perched leachate water within materials contained within the landfill; and a total of four deeper groundwater wells intersecting the natural groundwater table below the landfill.
- the excavation of ten shallow test pits within the surface material and sampling of shallow surface soils for contamination testing at a National Association of Testing Laboratories (NATA) Accredited Laboratory.
- the undertaking of four Talsma-Hallam Permeameter (permeability) tests from four of the shallow test pits.

Two rounds of landfill gas and groundwater monitoring were completed, following which SKM prepared an Interim Report on the findings. A further four rounds of landfill gas monitoring and two rounds of groundwater monitoring were then completed.

3.6 SOIL INVESTIGATIONS

For the majority of the landfill, the surface material was found to be comprised of a layer of silty sand (0-0.1 m thickness) and an underlying clay based material comprised of sandy clay to clayey sand (0.2-0.8 m thickness). The thickness of waste materials encountered varied from 1.2 m to 10.5 m. Where encountered, waste materials were found to be mixed in a damp to saturated grey unconsolidated clay or sandy clay matrix. The waste intersected in the investigation was domestic in origin, and appeared to contain infrequent residual putrescible materials. Common items noted in the waste materials included plastic packaging, plastic bags, metal fragments and glass bottles. No regulated wastes were noted in the waste material intersected.

The waste materials have been placed directly over natural materials in the majority of exploratory boreholes. This natural material was found to be the sandy clay strata (weathered sandstone) in the majority of boreholes. Consequently, it is considered highly likely that the perched water within the landfill is in connection with groundwater in the weathered sandstone.

3.7 GROUNDWATER INVESTIGATIONS

Two groundwater systems have been observed on the site. These include:

- groundwater within the weathered sandstone beneath the landfill; and
- perched water within the landfill.

No engineered liner was found in the landfill, and the natural underlying material was found to be the sandy clay strata (weathered sandstone) in the majority of boreholes. Consequently, it is considered highly likely that the perched water within the landfill is in connection with groundwater in the weathered sandstone.

Both the groundwater within the weathered sandstone and perched groundwater within the landfill flow in a north easterly direction towards Slacks Creek. The perched groundwater within the landfill is expected to combine with the groundwater in the weathered sandstone down gradient of the site. This is evident from ammonia and organic contaminants detected in monitoring wells installed by LCC down gradient of the landfill.

The TPR comments on the field investigations and sample analysis are summarised as follows:

- The identified contaminants of concern are consistent with historical site activities as identified within the site characterisation and as confirmed within the site walkover.
- The sample design was deemed as suitable to confirm / discount the presence of potentially impacted soils and groundwater.
- Soil, groundwater and gas sampling methodologies and maintenance of sample integrity were deemed to be in accordance with the guidelines as suitable for the investigations undertaken.
- The criteria for assessment of the soil, groundwater and landfill gas were considered appropriate for determining the contamination status of the site.

3.8 SOIL ANALYTICAL RESULTS

Seventeen samples of capping material were analysed for a range of potential contaminants including metals, asbestos, and/or organic analytes. Metals (chromium, copper, lead, nickel and zinc) were found in some of the samples analysed in low concentrations, however, all were well below the Human Health Assessment Criteria. Asbestos fibres were not detected in any of the samples analysed. All organic analytes were below laboratory detection limits in the samples analysed.

In-situ Talsma-Hallam Permeameter tests of the clay based material within the surface material indicated that the permeability of this material varied between 10^{-6} and 10^{-8} m/s.

Low bunds have been constructed over parts of the site to assist with the shedding of rainfall run-off from the surface material into the drains on the northern and southern boundaries of the site. These surface water drainage measures and the low permeability of the clay based surface material assist in limiting the infiltration of rainfall into the landfill.

3.9 GROUNDWATER ANALYTICAL RESULTS

Five rounds of groundwater monitoring have been undertaken at the site.

Physio-chemical Parameters and Ammonia

Perched water within the landfill generally tended to contain low salt content, low dissolved oxygen (DO), and acidic to slightly alkaline pH.

In general, groundwater in the weathered sandstone was generally acidic and saline, as observed in samples from the cross-gradient, and down-gradient monitoring wells.

Elevated concentrations of ammonia which exceed the Environmental and Human Health Assessment Criteria were found in groundwater samples from down-gradient monitoring wells which targeted perched water within the landfill, and groundwater monitoring wells in the weathered sandstone. The results show that the landfill is producing elevated

concentrations of ammonia in leachate, which is impacting on both the perched groundwater and the underlying aquifer.

Metals

The majority of samples from the on-site monitoring wells had concentrations of copper, lead, nickel and zinc with concentrations above the Environmental Assessment Criteria. The maximum concentrations detected, however, were lower than those found in up-gradient monitoring wells. The findings indicate that elevated concentrations of metals occur in the vicinity (and up-gradient) of the site. An elevated concentration of cadmium was detected in the drain on the eastern boundary of the site in one of the sampling rounds. All other samples from the drain and groundwater had concentrations of cadmium which were below the Environmental Assessment Criteria.

Hydrocarbons

An elevated concentration of hydrocarbons which exceeded the Environmental and Human Health Assessment Criteria was detected in the one sample at a concentration of 730 µg/L of TPH C₁₀-C₃₆ in the second monitoring round. All other samples tested, however, had concentrations of hydrocarbons (TPH C₁₀-C₃₆) which were below the Environmental Assessment Criteria.

Several other elevated results for hydrocarbons were found, however, on consultation with the laboratory, it has been advised that the main source of hydrocarbons found were not petroleum based, however the source of the hydrocarbons could not be confirmed.

These findings, with the exception of the result from the second monitoring round as discussed above, show that the elevated concentrations of TPH detected in groundwater, are likely to be comprised of mainly non-polar and non-petroleum based organic substances present in landfill leachate which are being generated through the decomposition of putrescible materials.

VOC's and SVOC's

VOCs were detected in samples from the perched water within the landfill, and from groundwater samples from down-gradient monitoring wells within the landfill. The concentrations of VOCs detected did not exceed the Environmental Assessment Criteria. VOCs were not detected in any off-site groundwater samples, or in water samples from the drain.

Elevated concentrations of phenolic compounds which exceeded the Environmental and Human Health Assessment Criteria were found in one sample of perched water in the second monitoring round. All other samples of perched water from this location, the other groundwater monitoring wells and the drain, had concentrations of phenolic compounds which were below the Environmental and Human Health Assessment Criteria.

All other SVOC analytes were below the Environmental Assessment Criteria in the samples analysed. Organo-pesticides, oxygenated compounds, fumigants, and PCB were not detected in any of the groundwater samples tested. SVOCs were not detected in groundwater sampled from off-site wells, or in water sampled from the drain.

3.10 LANDFILL GAS MONITORING RESULTS

LCC has undertaken an ongoing landfill gas monitoring program (2000 to 2008) from monitoring wells fitted with free-venting gas well caps installed around the boundary of the site. The monitoring program has detected low levels of methane gas over this time period with concentrations which were well below the Lower Explosive Limit (LEL) for methane

As part of the investigation, landfill gas monitoring wells were installed within the landfill. Five rounds of landfill gas monitoring have been undertaken.

Methane

Elevated concentrations of methane which exceeded the LEL were detected in four of the monitoring wells in the majority of monitoring rounds undertaken during the investigation. Maximum concentrations found ranged between 49.7% v/v and 99.3% v/v.

Carbon Dioxide

Elevated concentrations of carbon dioxide were also detected in the four wells which showed elevated methane levels. Maximum concentrations found ranged between 9.5% v/v and 15.5% v/v.

VOC's

A range of VOCs were detected in the gas samples collected, however, all had concentrations which were below the NOHSC Guideline.

Landfill Vent Monitoring Results

In the majority of monitoring rounds, low or non-detectable concentrations of methane and carbon dioxide were detected from the monitoring ports attached to the landfill vents. In one monitoring round, an elevated detection of methane which exceeded the LEL was found in one vent; all other vents, however, had concentrations of methane which were below the LEL or below detection limits.

3.11 QUALITY ASSURANCE / QUALITY CONTROL (QA / QC)

For QA/QC purposes and to maintain the integrity of the sampling procedures and sample transport the following QA/QC samples were collected:

- Three field duplicate (intra-laboratory samples) for soil and four field duplicates for water; and
- Three rinsate blanks for soil sampling equipment and one rinsate blank for water sampling equipment.

The results of the QA/QC for the project are as follows:

- Laboratory QA/QC samples were generally within the laboratories acceptance criteria;
- The relative percent difference (RPD) of field duplicates were generally within the acceptance criteria of less than 20% for inorganics and less than 50% for organics, with the exception three metal samples and one TPH sample for water. These exceedances are considered to be associated with low sample concentrations reported and to the difficulty in sampling volatiles within the groundwater matrix, not laboratory error;
- The holding times prior to the date the analyses (extraction) of the samples commenced were within the stated holding times with the exception of four water samples and four soil samples, which were only marginally outside the holding times. These results are considered to be acceptable; and
- The rinsate blanks reported no analytes above the laboratory limit of reporting (LOR) with the exception of one very low concentration of zinc.

Based on the QA/QC results as stated above, the quality of the field sampling and laboratory procedures were considered satisfactory for the samples to be confidently used for determining the concentrations of substances within the soil and groundwater.

The TPR comments on the soil, groundwater and landfill gas analytical results are summarised as follows:

- The results and justifications provided in interpretation of the results are acceptable.

The TPR comments on the QA/QC are summarised as follows:

- Sample receipt notices were provided and the samples were correctly preserved and received within the acceptable holding, chain of custody documents and security seals intact, except as noted within the QA/QC assessment. Chain of custody documents were completed signed and received by the laboratory.
- A QA/QC assessment has been undertaken outlining QA procedures, sample methodology, documentation and sample transportation.
- Quality control samples were obtained meeting the recommended sampling rate.
- Analysis of field duplicate samples indicated generally acceptable RPDs for the purpose of the sampling and analysis program.
- Field rinsate samples returned results below the laboratory limit of reporting, with the exception of one sample for zinc.
- Laboratory duplicate analysis reported generally acceptable RPDs.
- The assessment of the QA/QC by SKM was considered acceptable and the results are suitable to use.

3.12 QUALITATIVE RISK ASSESSMENT

Risk to Human Health

The findings of the soil sampling of the capping material indicated that potential contaminants were at concentrations which would not pose an unacceptable risk to future site users.

The capping layer of the eastern embankment of the landfill was found to be comprised of poorly structured clayey sand (0.2-0.5 m thickness). It was suggested that the thickness of the surface material at this location does not provide an adequate barrier between the surface and the waste material below. It was recommended that the capping layer of the eastern embankment be built up to provide a minimum thickness of 0.5 m.

Monitoring of landfill gases from the perched wells indicated that the waste materials are generating methane at concentrations well above the LEL. Landfill gas which includes methane is considered to pose a risk to future site users as an asphyxiant and flammable gas. Controls will need to be put in place to mitigate potential risks to future site users.

Risk to the Environment

It was considered highly likely that the perched water from the landfill was in connection with the groundwater in the weathered sandstone, and these systems combine down-gradient of the landfill. These groundwater systems flow in a north-easterly direction

towards Slacks Creek. Slacks Creek is located approximately 320 m east of the site, and is considered to be the main environmental receptor of groundwater from the site.

Based on the analytical groundwater monitoring results, the following was concluded:

- Leachate from the landfill was unlikely to be having a deleterious effect on groundwater with respect to metals.
- Concentrations of nitrate and total phosphorous in downstream groundwater have been found to be below the Environmental Assessment Criteria.
- Hydrocarbons have been found in groundwater samples consistently throughout the monitoring, however this hydrocarbon, with the exception of one sample, has been found to be from organic sources such as putrescible wastes, therefore was not considered to pose a risk to the environment.
- Ammonia, which has been detected as leaching from the landfill, is a known toxicant to fish and can have a deleterious effect on aquatic ecosystem health. However, factors such as dilution would lower the concentration of ammonia prior to discharge to the nearest receiving watercourse.
- An elevated concentration of 1,4-Dichlorobenzene and a phenolic compound which exceeded the Human Health Assessment Criteria were found in a perched water sample from one of the monitoring wells in the second monitoring round, however as these levels were not consistently found and based on dilution factors in the receiving environment, the risk to human health from this VOC and SVOC was considered to be low.

3.13 SKM CONCLUSIONS AND RECOMMENDATIONS

Cronulla Park was formerly used a landfill between the 1970s and 1980s. GQL engaged SKM to undertake a Stage 1 and Stage 2 Contaminated Site Investigation to establish:

- whether the site in its current condition poses an unacceptable risk to human health and/or the receiving environment; and
- whether remediation will be required to enable the site to be used for a commercial land use (greyhound racing facility), and if so, the required remedial measures.

The landfill surface material was found to be comprised of a layer of silty sand and an underlying clay based material. The surface layer of the eastern embankment of the landfill was found to be comprised of poorly structured clayey sand. Below this, where encountered, waste materials varied in thickness from 1.2 to 10.5 metres. An engineered liner was not found beneath the waste material. Underlying the waste was a sandy or silty clay of weathered sandstone.

Two groundwater systems have been observed on the site including groundwater within the weathered sandstone beneath the landfill and perched water within the landfill. The perched water was thought to be likely to be in connection with the groundwater in the weathered sandstone beneath the landfill. These two systems also combined together down-gradient of the landfill. These groundwater systems flow in a north-easterly direction to Slacks Creek which is located approximately 320 m east of the site. Slacks Creek is the main environmental receptor of both groundwater and surface water from the site.

Soil sampling results showed that the capping materials at the site were found to contain contaminant concentrations which were below the Human Health Assessment Criteria. Shallow soils at the site were concluded would not subsequently pose an unacceptable risk to human health.

Monitoring of landfill gases from the perched wells indicated that the waste materials were generating methane at concentrations well above the LEL. Landfill gas which is primarily methane, was considered to pose a risk to future site users as an asphyxiant and flammable gas. Volatile organic compounds have been detected in landfill gases at concentrations which were below the NOHSC Guidelines, and accordingly were thought unlikely to pose an unacceptable risk to future uses of the site.

It was considered likely that landfill leachate from the site which contained elevated concentrations of ammonia and organics was potentially having some minor deleterious impact on water quality in Slacks Creek. Residential and commercial/industrial areas located within the catchment will also be contributing to the degradation of Slacks Creek, which is a highly disturbed system that has been heavily modified from its natural state.

On the basis that the landfill has not been constructed with an engineered liner or leachate collection system, it was not considered feasible to modify the landfill to effectively capture and treat landfill leachate. The concentration of contaminants in leachate from the landfill will decrease with time as the putrescible material in the landfill degrades. This process is occurring as evident from the decrease in ammonia concentrations in groundwater from 2000 to 2008-09. The most appropriate approach for the ongoing management of the site in regard to groundwater was considered to be the continuation of the monitoring program currently being undertaken to confirm that attenuation of contaminants is occurring over time.

Based on the findings of the investigation the site was considered to be suitable for the proposed development and use provided that potential risks relating to landfill gas and contaminated groundwater are addressed in the design, construction, and future management stages of the site. It is intended the site will be constructed in accordance with a Remediation Plan (RP), and managed post-construction under a Site Management Plan (SMP). The SMP will provide a framework for ongoing environmental monitoring as well as stipulate any ongoing operational controls for the site, and will be administered by LCC. The SMP will include groundwater and landfill gas monitoring at the site.

The key remedial measures required for the redevelopment of the site include:

- the building up of the capping layer in the eastern embankment of the site;
- the inclusion of gas protection measures in buildings;
- the re-construction of gas vents closed during the construction phase for the proposed development;
- the location of services above the capping material where practicable;
- the use of sensitive construction and piling measures to minimise disturbance to the capping material;

- the use of low permeability materials or membranes for proposed water storage areas on the site;
- the undertaking of an ongoing monitoring program during and post development of the site; and
- the confirmation that former underground tank on the site has been removed.

The TPR comments regarding the SKM conclusions are summarised as follows:

- The work completed on-site has been suitably summarised in the SKM reports.
- The conclusions drawn are a fair reflection of the work completed, conditions at the site and the results recorded.
- The conclusion regarding the future remediation of the site and the ongoing management of the site under a Site Management Plan (SMP) following the remediation works are suitable.
- If there is a requirement for future approval of a Development Application (DA), a formal remediation Action Plan (RAP) and SMP will be required.

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4 TPR SITE INSPECTIONS 17TH APRIL AND 31ST JULY 2009

Based on the site inspections, the TPR can verify the findings of the SKM work.

The findings of the TPR site inspections are summarised as follows:

- The TPR carried out site inspections on both the 17th April and 31st July 2009 to undertake an audit and verify the sampling program and protocols.
- The TPR reviewed the investigation sample and monitoring locations and density undertaken and undertook a detailed walkover of the site to identify any unidentified areas of environmental concern.
- TPR general photos are provided in *Appendix D*.

RTI DL RELEASE - EHP

5 CORRESPONDENCE

DERM correspondence is summarised as follows:

- TPR approval letter for the site (provided in **Appendix A**).
- Email correspondence throughout the course of the project.

TPR correspondence with GQL and SKM is summarised as follows:

- Email correspondence throughout the course of the project.
- TPR comments on the draft Sampling and analysis Plan date 24th April 2009
- TPR comments on the interim investigation report date 18th August 2009.
- TPR comments on the investigation reports dated 28th January and 14th June 2010.

Appropriate correspondence is included in **Appendix E**.

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6 TPR CONCLUSIONS AND RECOMMENDATIONS

6.1 TPR SUMMARY OF INTERPRETATIONS AND CONCLUSIONS

The following provides a summary of the interpretations and conclusions drawn during the assessment of SKM report, the TPR site inspections and discussions with SKM and the DERM:

- The CSI report suitably summarised the investigation work completed on-site and is of an adequate coverage and standard to meet the requirements of the guidelines.
- The works were suitably completed and are considered to be adequate to verify the future required remediation works and management of the site.
- The conclusions drawn were a fair reflection of the work completed and results recorded for the works.
- The recommendation for a Remediation Plan is suitably, however, it should be noted that if formal approval is sought, a SMP and RAP will be required for review and approval.

6.2 TPR RECOMMENDATIONS

Based on the TPR assessment of the work completed and a review of the SKM CSI report, the following recommendations are made:

- The TPR concurs with the SKM conclusion, based on the results of their investigations, that the site can be remediated under a remediation plan, then subsequently managed under a SMP, however, if approval is required for a Development Application a formal SMP and RAP will be needed; and
- At this stage the TPR concludes that should remain on the EMR and is suitable for vacant use. Prior to commencement of any other use at the site, a RAP and SMP should be produced to safely manage the site. The RAP and SMP will require TPR and DERM review and if appropriate, approval.

7 LIMITATIONS

This report is produced exclusively for the benefit of Greyhounds Queensland Limited Pty Ltd (and DERM) and no liability is accepted for any reliance placed on it by any other party unless specifically agreed in writing otherwise. This report is prepared for the proposed uses stated in the report and the scope outlined and should not be used in whole or part in a different context without reference to MACH1. In time, improved practices or amended legislation may necessitate a re-assessment of the site.

This report refers, within the limitations stated, to the condition of the site at the time of the inspections. No warranty is given as to the possibility of future changes in the condition of the site.

The report is limited to those aspects of land contamination specifically reported on and is necessarily restricted to this and no liability is accepted for any other aspect especially concerning gradual or sudden pollution incidents. The opinions expressed in this report cannot be absolute due to the limitations of time and resources imposed by an agreed client brief and the possibility of un-recorded previous site use and abuse of the site and adjacent sites.

The findings of this report are based on the Scope of Work outlined in this Section 2 of this report. MACH1 performed the services in a manner consistent with the normal level of care and expertise exercised by members of the contaminated land remediation and environmental auditing profession. No warranties, or guarantees, express or implied, are made.

Subject to the Scope of Work, MACH1's assessment is limited strictly to identifying typical environmental conditions associated with the subject property and does not evaluate structural conditions of any buildings on the subject property, nor any other issues. Although normal standards of professional practice have been applied, the absence of any identified hazardous or toxic materials (including soil and groundwater) on the subject property should not be interpreted as a guarantee that such materials do not exist on the site.

This assessment is based on site inspections conducted by MACH1 personnel, sampling and analyses described in the report was conducted by SKM and information used in the report was provided by SKM, the property owner (LCC) or other people with knowledge of the site conditions.

All conclusions and recommendations made in the report are the professional opinions of MACH1 personnel involved with the project and, while normal checking of the accuracy of data has been conducted, some of the opinions are based on unconfirmed data and work conducted by others. MACH1 assumes no responsibility or liability for errors in data

obtained from regulatory agencies, SKM or any other external sources, nor from occurrences outside the scope of this project.

MACH1 is not engaged in environmental auditing or reporting for the purpose of advertising, sales promoting, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. The report should not be used or reproduced in full or in part for any such promotional purposes, and may not be used or relied upon in any prospectus or offering circular.

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Appendix A

DERM Letter of Approval

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Appendix B

TPR Statutory Declaration

RTI DL RELEASE - EHP

STATUTORY DECLARATION

Address of Site Investigated: Corner Compton Road and Kingston Road,
Slacks Creek, QLD 4127.
Real Property Description: Lot 658 on SL12298.
Title of Report: Third Party Reviewer Certification Report:
Logan Greyhound Facility, Slacks Creek,
Queensland (Lot 658 on SL12298) June 2010.

I, Robin Wagland, of MACH1 Environmental Pty Ltd (Ferny Hills, QLD 4055) in the State of Queensland, do solemnly and sincerely declare that:

1. I was the Third Party Reviewer appointed by the Queensland Government Department of Environment and Resources, Contaminated Land Unit for the Slacks Creek site described above.
2. Information was collected and collated by Sinclair Knight Merz Pty Ltd in their report titled: - *Logan Greyhound Facility, Cronulla Park, Contaminated Site Investigation*, dated June 2010, Report No. QE09537.
3. I am a member of the Environment Institute of Australia and New Zealand and my qualifications and experience (submitted previously to the DERM) are relevant to this investigation.
4. I have not knowingly included any false, misleading or incomplete information in the report.
5. I certify that the site has been assessed to a standard such that the health and environmental risks associated with the contamination at the site have been assessed.
6. I certify that the site (Lot 658 on SL12298) should remain on the Environmental Management Register (EMR).

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

Signature

49-Sch4 - Signature

Name

Taken and declared before me at Slacks Creek this 30th day of JUNE 2010

Witness (Justice of the Peace/Commissioner for Declarations/Solicitor)

Signature

49-Sch4 - Signature

Name



Appendix C

Figures

RTI DL RELEASE - EHP



Logan Greyhound Facility Supplementary Site Investigation

Legend



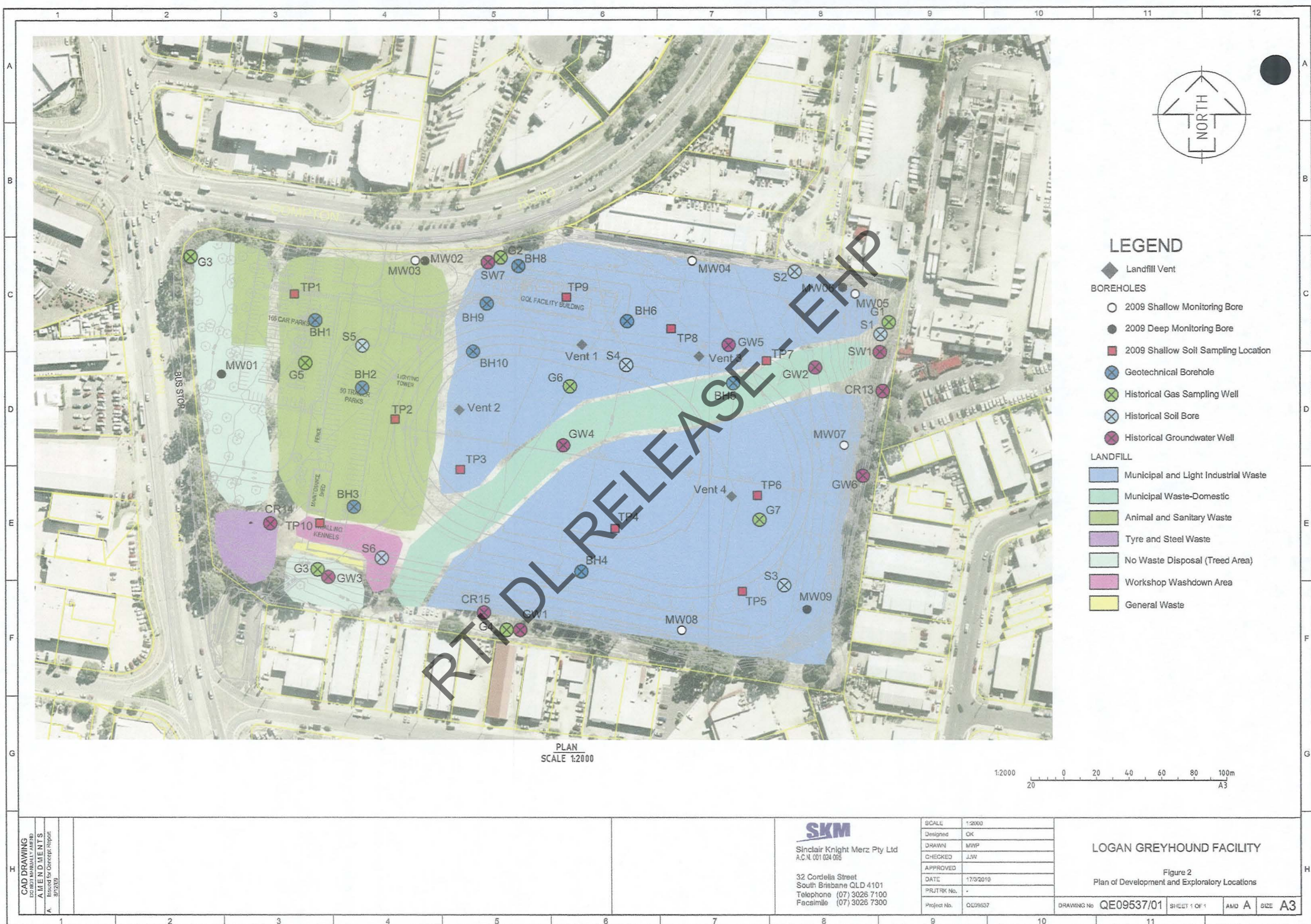
Site Boundary

Notes:

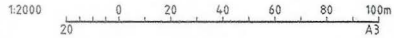
1. Aerial Photograph - Google Earth Pro, 2008
2. Scale and features shown are approximate locations only

Figure 1
Site Location Plan





PLAN
SCALE 1:2000



CAD DRAWING
DCC BY MANUALLY ADDED
AMENDMENTS
A:
18/02/2019

SKM
Sinclair Knight Merz Pty Ltd
A.C.N. 001 024 095

32 Cordelia Street
South Brisbane QLD 4101
Telephone (07) 3026 7100
Facsimile (07) 3026 7300

SCALE	1:2000
Designed	OK
DRAWN	MWP
CHECKED	JW
APPROVED	
DATE	17/02/2019
PROJECT No.	Q09537

LOGAN GREYHOUND FACILITY

Figure 2
Plan of Development and Exploratory Locations

DRAWING No	Q09537/01	SHEET 1 OF 1	AND A	SIZE A3
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DATE: 23/12/2019 4:48:37 PM
LOCATION: I:\ENGIN\Projects\QE09537\005 - Geotechnical Investigation\05\wp\wp_4.dwg

LOGON NAME: ROGERS, JANET [EKH]
LOCATION: I:\ENGIN\Projects\QE09537\005 - Geotechnical Investigation\05\wp\wp_4.dwg

LEGEND

- EXISTING PARK RP BOUNDARY
- OPEN CHANNEL FLOW PATH
- DRAINAGE FLOW DIRECTION
- LANDFILL VENT
- THICK TALL GRASSED AREA WITH SMALL TREES

CAD DRAWING
DO NOT MANUALLY AMEND
AMENDMENTS

13-054

RT/DL RELEASE - EHP

SKM

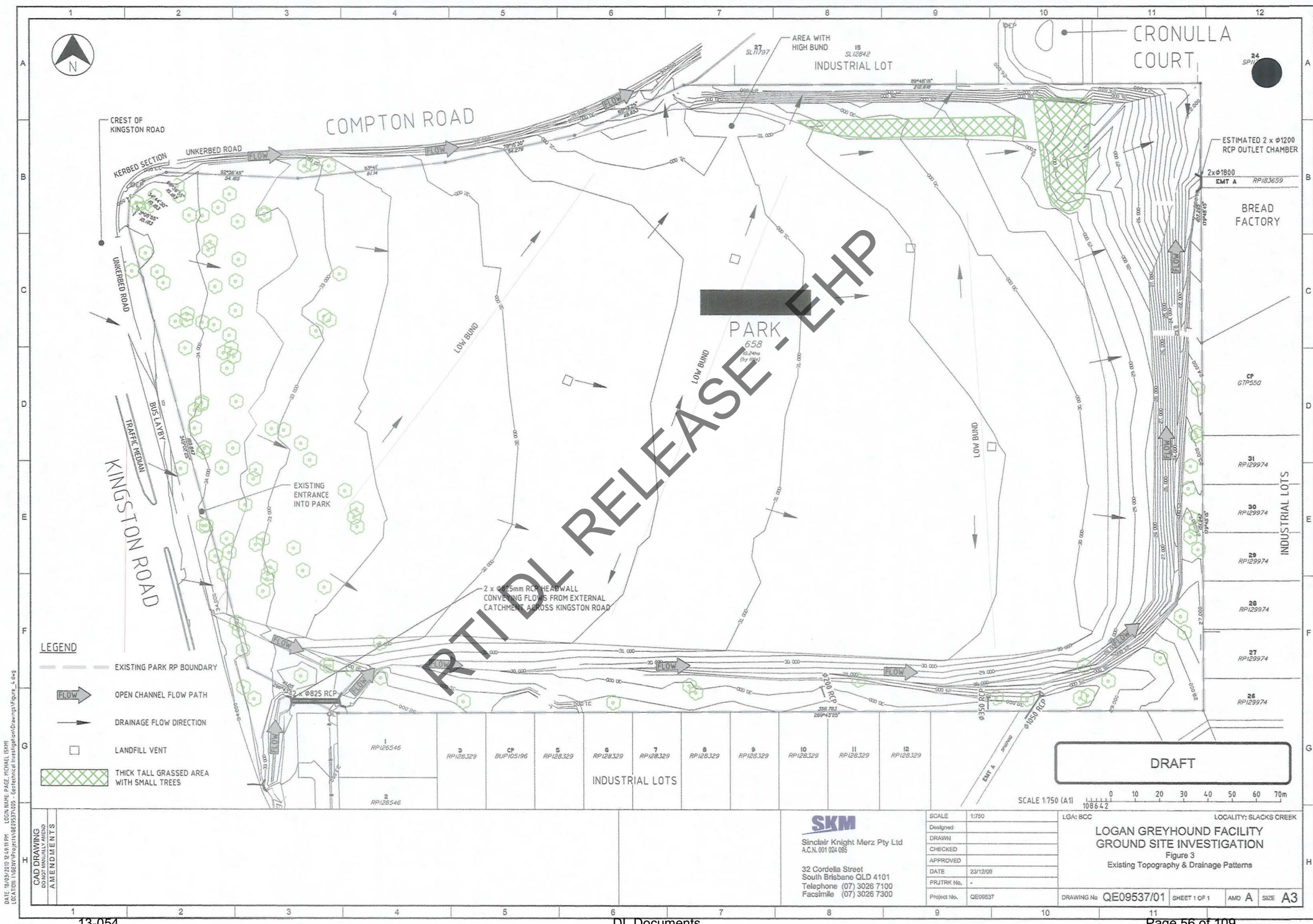
Sinclair Knight Merz Pty Ltd
A.C.N. 001 024 085
32 Cordella Street
South Brisbane QLD 4101
Telephone (07) 3026 7100
Facsimile (07) 3026 7300

SCALE	1:750
Designed	
DRAWN	
CHECKED	
APPROVED	
DATE	9/12/09
PROJECT No.	QE09537

LG: BCC

LOCALITY: SLACKS CREEK
LOGAN GREYHOUND FACILITY
GROUND SITE INVESTIGATION
Figure 3
Existing Topography & Drainage Patterns

DRAWING No QE09537/01 SHEET 1 OF 1 AMD A SIZE A3



DATE: 10/03/2019 12:48:18 PM
LOCATION: LOGAN GREYHOUND FACILITY
PROJECT: LOGAN GREYHOUND FACILITY
DRAWING: LOGAN GREYHOUND FACILITY
FIGURE: 3

- LEGEND**
- EXISTING PARK RP BOUNDARY
 - OPEN CHANNEL FLOW PATH
 - DRAINAGE FLOW DIRECTION
 - LANDFILL VENT
 - THICK TALL GRASSED AREA WITH SMALL TREES

CAD DRAWING
DO NOT MANUALLY AMEND
AMENDMENTS

SKM
Sinclair Knight Merz Pty Ltd
A.C.N. 001 024 065
32 Cordella Street
South Brisbane QLD 4101
Telephone (07) 3026 7100
Facsimile (07) 3026 7300

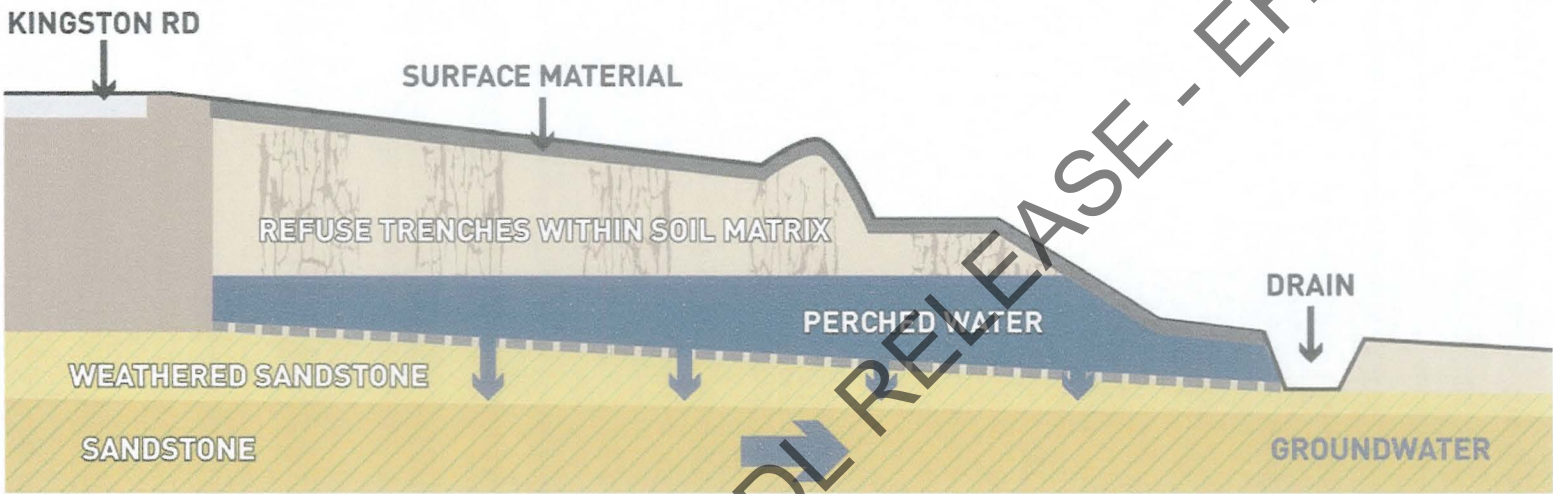
SCALE	1:750
DESIGNED	
DRAWN	
CHECKED	
APPROVED	
DATE	23/12/09
PROJECT No.	
Project No.	QE09537

LGA: BCC	LOCALITY: SLACKS CREEK
LOGAN GREYHOUND FACILITY GROUND SITE INVESTIGATION Figure 3 Existing Topography & Drainage Patterns	
DRAWING No	QE09537/01
SHEET 1 OF 1	
AMD	A
SIZE	A3

W →

Logan Greyhound Facility
Supplementary Site
Investigation

Legend



Notes:
1. Figure not to scale.

Figure 5
Conceptual Site Geology

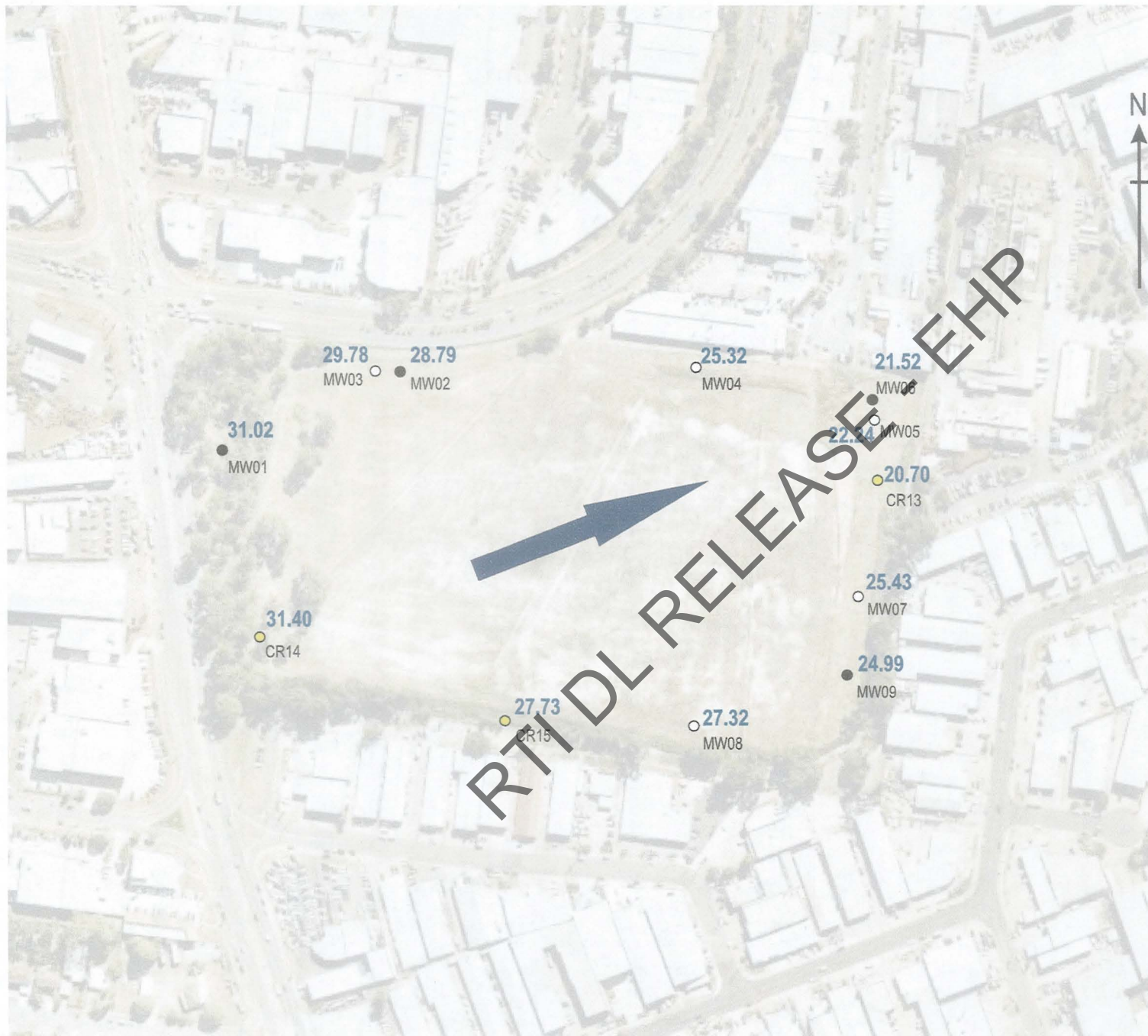
Logan Greyhound Facility

Legend

- 2009 Shallow Monitoring Bore
- 2002 Shallow Monitoring Bore
- 2009 Deep Monitoring Bore
- 22.24 Average Groundwater Level over monitoring period (m AHD)
- ➔ Approximate Groundwater Flow Direction

Notes:
 1. Aerial Photograph - Google Earth Pro, 2008
 2. Scale and features shown are approximate locations only

**Figure 6
Average Groundwater
Levels**



RECEIVED 20 JUN 2010



Queensland
Government

Enquiries Greg O'Brien
Telephone (07) 33305709
Your reference
Our reference BNE7447

Department of
Environment and Resource
Management

18 June 2010

Mr Robin Wagland
MACH 1 Environmental
PO Box 320
Ferry Hills Qld 4055

Dear Mr Wagland,

**APPOINTMENT AS THIRD PARTY REVIEWER: GREYHOUND FACILITY,
FORMER LANDFILL, CNR COMPTON AND KINGSTON ROADS SLACKS
CREEK, L658 SL12298**

Department of Environment and Resource Management (DERM) advises that, following panel review under the TPR Terms of Reference (TOR), your application dated 2 June 2010 is accepted to act as TPR for the above site.

This approval is conditional on the following:

1. The acceptance applies to the subject site only and to site investigation and validation work conducted and certified by a person whose qualifications and experience are acceptable to DERM under the above provisions.
2. The requirements of the Terms of Reference, *Use of a third party reviewer (TPR) for assessment and management of site contamination*, (TOR) 15 February 2008 must be complied with in relation to all site activities undertaken.
3. The DERM is to be advised in writing within 5 days of final execution of all contractual documents associated with your engagement by the site owner and other relevant parties.

This acceptance does not infer that your services as TPR will be accepted for any other site. Applications for other sites will be assessed according to the TOR. Should you require any additional information, please contact the undersigned or the DERM project officer for any relevant site.

Yours sincerely,

49-Sch4 - Signature

Greg O'Brien
Chief Scientific Advisor, Environmental Operations

Page 1 of 1

400 George Street Brisbane
Queensland 4000 Australia
GPO Box 2454
Brisbane Qld 4001
Telephone 61 7 33305709
Facsimile 61 7 33305754
Website www.derm.qld.gov.au
ABN 87 221 158 786

Appendix D

TPR Photographic Log

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Photo 1: General View of site looking north east from area of former UST 17/04/09



Photo 2: General View of site looking south east towards to surface drain 17/04/09



Photo 3: General View of western area of the site showing mature trees 17/04/09



Photo 4: General View of site looking east to commercial property 17/04/09



Photo 5: General View of existing gas vent 17/04/09



Photo 6: Typical greyhound track (Albion) 31/07/09

Slacks Creek Certification Report: Appendix D Photolog

Appendix E

Correspondence

RTI DL RELEASE - EHP

From: Robin Wagland [robin@mach1environmental.com.au]
Sent: Monday, 14 June 2010 10:24 AM
To: 'Wicks, Jeremy J (SKM)'
Cc: 'Graham, Rick A (SKM)'
Subject: RE: Cronulla Park, Amended Draft Site Investigation Report

Jeremy/Rick,

Further to issue of your amended report for the Cronulla Park site and associated response to comments, as TPR for the site, I have reviewed this report and acknowledge that this now meets DERM requirements. The following are minor comments to address/amend:

- Section 9.1 – Bullet Point 3 – “significantly” – Typo.
- Section 10.4 – RP or RAP. The TPR will need to confirm with DERM their requirements for approval of the DA for the site. This may in fact need to be a RAP. At this stage I suspect it is not crucial, but it should be confirmed if a formal SMP and RAP be required in advance of the construction phase.

I look forward to the final report in due course and assume all the changes outlined in the response to comments will be included. The TPR reserves the right to check the further amendments not presented in full here i.e. Appendices.

Further to our recent discussions, I look forward to an outline of the landfill gas control measures to be employed as part of the detailed design and in due course a SMP and RAP (as appropriate). The future requirements and timing of these can be determined further upon consultation with DERM.

Kind regards,

Robin.

Robin Wagland
Principal
Third Party Reviewer

MACH1 Environmental Pty Ltd
Tel + 61 (0)7 3351 0468
Fax + 61 (0)7 3351 0351
Mob + 61 (0)7 3351 0351 - Mobile phone



Tel: +61 (0)7 3351 0468
Fax: +61 (0)7 3351 0351

PO Box 320
Ferny Hills, QLD 4055
www.mach1environmental.com.au

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From: Wicks, Jeremy J (SKM) [mailto:JWicks@skm.com.au]
Sent: Friday, 21 May 2010 4:14 PM
To: Robin Wagland
Cc: Graham, Rick A (SKM)
Subject: Cronulla Park, Amended Draft Site Investigation Report

Cc: Graham, Rick A (SKM)

Subject: Logan Greyhound Facility, Cronulla Park, Draft Contaminated Land Report

Robin

Attached is the Draft Contaminated Land Report for your review. A hard copy of the report has been sent to you by courier.

Have a great Christmas and I'll speak to you in the New Year.

Best regards

Jeremy Wicks

Senior Environmental Consultant

Manager Contaminated Land, Groundwater, Geotechnical Engineering

Sinclair Knight Merz

Ph: +61 7 3026 7526

Mob: +61 49-Sch4 - Mobile phone

Fax: +61 7 3026 7306

32 Cordelia Street, South Brisbane Qld 4101

PO Box 3848, South Brisbane Qld 4101

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Ro

We are now underway again with Cronulla Park. The attached pdf file provides a summary of how we have addressed your comments in the Draft Report. Where changes have been made to the Draft report, these are shown as tracked changes in the word document. I have also re-attached your comments fyi.

There have been some changes to the proposed development, the key ones being the inclusion of a second storey to the main building, and a inner running track. The new layout is shown in the plans in Appendix A and B.

I will be attaching the remaining appendices in a separate email and will call you to discuss.

Best regards

Jeremy Wicks

Senior Environmental Consultant
GeoSpatial Section Manager (Acting)

Sinclair Knight Merz

Ph: +61 7 3026 7526
Mob: +61 7 3026 7526
Fax: +61 7 3026 7306
32 Cordelia Street, South Brisbane Qld 4101
PO Box 3848, South Brisbane Qld 4101

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From: [Kim Barry](#)
To: [Robin Wagland](#)
Subject: RE: MCU and Opw for a greyhound racing facility at Lot 658 on SL12298 (MCUC/130/2010)
Date: Tuesday, 1 June 2010 10:33:36 AM

Robin,
DERM is unable to condition a development on a former landfill site without detailed gas protection measures. DERM may consider concurrence to a preliminary approval only.
Regards,
Kim

Kim Barry
Chief Scientific Advisor, Contaminated Land Unit
Telephone: 3330 5693 **Mobile:** 49-Sch4 - Mobile phone
www.derm.qld.gov.au
Department of Environment and Resource Management
8th floor 400 George Street
PO Box 15155, City East Q 4002
http://www.epa.qld.gov.au/environmental_management/land/contaminated_land/

Please Note

We have recently moved to the above address.

From: Robin Wagland [<mailto:robin@mach1environmental.com.au>]
Sent: Tuesday, 1 June 2010 10:16 AM
To: Kim Barry
Subject: FW: MCU and Opw for a greyhound racing facility at Lot 658 on SL12298 (MCUC/130/2010)

Robin Wagland
Principal
Third Party Reviewer

MACH1 Environmental Pty Ltd
Tel + 61 (0)7 3351 0468
Fax + 61 (0)7 3351 0351
Mob + 49-Sch4 - Mobile phone



Tel: +61 (0)7 3351 0468
Fax: +61 (0)7 3351 0351

PO Box 320
Ferny Hills, QLD 4055
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From: Wicks, Jeremy J (SKM) [<mailto:JWicks@skm.com.au>]

Sent: Monday, 31 May 2010 3:00 PM
To: Robin Wagland
Cc: Graham, Rick A (SKM)
Subject: FW: MCU and Opw for a greyhound racing facility at Lot 658 on SL12298 (MCUC/130/2010)

Robin

Further to our discussion, attached is the information request from Council. Note in our response to you on the 21 May 2010 that Council has advised that the site is not subject to an ERA. The site is on the EMR however it is not managed under a SMP.

As per our previous discussions, the preferred approach is for a Planning Approval subject to Conditions following your acceptance of the Phase 2 Report, and the Remedial Plan and the submission of these under a Statutory Declaration. This is because particularly aspects of remediation, such as the finalisation of gas protection measures for buildings, will need to be confirmed during the detailed design phase of the project which will occur once the Planning Approval has been received.

Note that work being undertaken and reports prepared have been subject to involvement and review from Rick Graham. Rick is a Suitably Qualified person.

Can you please discuss with DERM and clarify the approval process we will be following.

Best regards

Jeremy Wicks
Senior Environmental Consultant
GeoSpatial Section Manager (Acting)
Sinclair Knight Merz
Ph: +61 7 3026 7526
Mob: +61 7 3026 7526
Fax: +61 7 3026 7306
32 Cordelia Street, South Brisbane Qld 4101
PO Box 3848, South Brisbane Qld 4101
For further information, visit our website www.skmconsulting.com

From: Andrew Gaffney [mailto:Andrew.Gaffney@mldesign.com.au]
Sent: Wednesday, 12 May 2010 2:57 PM
To: Wicks, Jeremy J (SKM); Michael Rasi; dbeavis@greyhoundsqueensland.com.au; Holford, Marcus (SKM)
Subject: FW: MCU and Opw for a greyhound racing facility at Lot 658 on SL12298 (MCUC/130/2010)

Hello Jeremy,

Can you please review the attached Information Request and advise of actions required to progress assessment.

Regards

Andrew Gaffney | Senior Town planner | ML Design
Level 8, 333 Ann Street | GPO Box 714 Brisbane Qld Australia 4001 | www.mldesign.com.au
Phone: (07) 3221 6188 | Mob: (07) 3229 6863 | andrew.gaffney@mldesign.com.au

architecture | master planning | urban design | interior design

From: Jeuda Adi [mailto:Adi.Jeuda@derm.qld.gov.au]
Sent: Wednesday, 12 May 2010 2:11 PM
To: Andrew Gaffney
Cc: Harvey Liz; bpuda@logan.qld.gov.au
Subject: MCU and Opw for a greyhound racing facility at Lot 658 on SL12298 (MCUC/130/2010)

Dear Andrew

Please find attached DERM's Information Request for the above application. The assessment manager has also been sent a copy of this email correspondence. A hard copy will be sent to each party by mail.

Kind regards

Adi Jeuda
Senior Planning Officer (Planning & Assessment)

Telephone 07 3884 8041 Fax 07 3884 8024
email adi.jeuda@derm.qld.gov.au

Department of Environment and Resource Management
32 Tansey Street, Beenleigh Qld 4207
PO Box 1164, BEENLEIGH Qld 4207
www.derm.qld.gov.au

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From: Wicks, Jeremy J (SKM) [JWicks@skm.com.au]
Sent: Monday, 31 May 2010 3:00 PM
To: Robin Wagland
Cc: Graham, Rick A (SKM)
Subject: FW: MCU and Opw for a greyhound racing facility at Lot 658 on SL12298 (MCUC/130/2010)
Attachments: IC0410BEE0020_LOG6122_100512_IR_ContamLand_DC.pdf

Robin

Further to our discussion, attached is the information request from Council. Note in our response to you on the 21 May 2010 that Council has advised that the site is not subject to an ERA. The site is on the EMR however it is not managed under a SMP.

As per our previous discussions, the preferred approach is for a Planning Approval subject to Conditions following your acceptance of the Phase 2 Report, and the Remedial Plan and the submission of these under a Statutory Declaration. This is because particularly aspects of remediation, such as the finalisation of gas protection measures for buildings, will need to be confirmed during the detailed design phase of the project which will occur once the Planning Approval has been received.

Note that work being undertaken and reports prepared have been subject to involvement and review from Rick Graham. Rick is a Suitably Qualified person.

Can you please discuss with DERM and clarify the approval process we will be following.

Best regards

Jeremy Wicks
Senior Environmental Consultant
GeoSpatial Section Manager (Acting)

Sinclair Knight Merz
Ph: +61 7 3026 7526
Mob: +61 7 3026 7526 - Mobile phone
Fax: +61 7 3026 7306
32 Cordelia Street, South Brisbane Qld 4101
PO Box 3848, South Brisbane Qld 4101

For further information, visit our website www.skmconsulting.com

From: Andrew Gaffney [mailto:Andrew.Gaffney@mldesign.com.au]
Sent: Wednesday, 12 May 2010 2:57 PM
To: Wicks, Jeremy J (SKM); Michael Rasi; dbeavis@greyhoundsqueensland.com.au; Holford, Marcus (SKM)
Subject: FW: MCU and Opw for a greyhound racing facility at Lot 658 on SL12298 (MCUC/130/2010)

Hello Jeremy,

Can you please review the attached Information Request and advise of actions required to progress assessment.

Regards

Andrew Gaffney | Senior Town planner | **ML Design**
Level 8, 333 Ann Street | GPO Box 714 Brisbane Qld Australia 4001 | www.mldesign.com.au

From: Jeuda Adi [<mailto:Adi.Jeuda@derm.qld.gov.au>]
Sent: Wednesday, 12 May 2010 2:11 PM
To: Andrew Gaffney
Cc: Harvey Liz; bpuda@logan.qld.gov.au
Subject: MCU and Opw for a greyhound racing facility at Lot 658 on SL12298 (MCUC/130/2010)

Dear Andrew

Please find attached DERM's Information Request for the above application. The assessment manager has also been sent a copy of this email correspondence. A hard copy will be sent to each party by mail.

Kind regards

Adi Jeuda
Senior Planning Officer (Planning & Assessment)

Telephone 07 3884 8041 **Fax** 07 3884 8024
email adi.jeuda@derm.qld.gov.au

Department of Environment and Resource Management
32 Tansey Street, Beenleigh Qld 4207
PO Box Box 1164, BEENLEIGH Qld 4207
www.derm.qld.gov.au

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RTI DL RELEASE - EHP

Information request

This notice is issued by the Department of Environment and Resource Management pursuant to section 276 of the Sustainable Planning Act 2009 ("the Act").

Greyhounds Queensland Ltd
C/- ML Design
GPO Box 714
BRISBANE QLD 4001

Your ref: GREY0001
Attention: Andrew Gaffney

cc. Chief Executive Officer
Logan City Council
PO Box 3226
LOGAN CITY DC QLD 4114

Your ref: MCNO/130/2010
Attention: Marta Osipowicz

DERM reference:
IC0410BEE0020_LOG6122_347288

1. The Chief Executive, Department of Environment and Resource Management (DERM) as a Concurrence Agency, requests the applicant give further information needed to assess the application. That further information is stated in the attached information request.
2. **Application Details**

Date application made to DERM:	12/04/2010
Development approval applied for:	MCU & OpWks, Lot 658 on SL12298 (Kingston Road, Slacks Creek)
Aspect(s) of development:	Operational work - Clearing vegetation - <i>Sustainable Planning Regulation 2009</i> - Schedule 7, table 2, item 5 & Material change of use - Contaminated land - <i>Sustainable Planning Regulation 2009</i> - Schedule 7, table 2, item 23.
3. Under section 279 of the Act, the application will lapse unless the applicant gives the Concurrence Agency a response to the information request within 6 months of receiving the information request. Section 278 of the Act also requires the response to include a written notice to the requesting authority stating:
 - (a) all of the information requested is provided; or
 - (b) part of the information requested is provided, and to proceed with assessment of the application; or

- (c) the applicant does not intend to supply any of the information requested, and to proceed with assessment of the application.

4. A response to the information request must be given to DERM at the address stated below.

49-Sch4 - Signature

Delegate
Adi Jeuda
Senior Officer (Planning and Assessment)
Beenleigh Planning – South East Region
12 May 2010

Enquiries:
Dan Coy
Department of Environment and Resource Management
32 Tansey Street, Beenleigh, Qld 4207
PO Box 1164, Beenleigh, Qld 4207

Telephone + 61 7 3884 8001
Facsimile + 61 7 3884 8024
Website www.derm.qld.gov.au

Attachments – Information Request
– Notice of Response to Information Request

Information Request

DERM ref. no: IC0410BEE0020_LOG6122_347288

Contaminated Land Matters

Information Required

1. Sufficient information provided in accordance with the *Environmental Protection Act 1994* and the *Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland* (DEH, 1998) specifying that the land is suitable for the intended use or enabling a statement of suitability with a Site Management Plan (SMP).
2. The Information requested under clause 1 above must be reviewed and consented to by the Third Party Reviewer (TPR) before submitting to DERM.
3. Third Party Reviewer. A Third Party Reviewer (TPR) must be appointed under DERM's *Terms of Reference – Use of a Third Party Reviewer for Assessment and Management of Site Contamination dated 15 Feb 2008* (TOR).
4. A TPR acceptable to DERM must be engaged at all times until draft Site Management Plans, acceptable to DERM are submitted or the subject land has been removed from the Environmental Management Register.

Additional Contaminated Land comments or advice about the application:

DERM may recommend refusal or preliminary approval if all the information requested is not provided.

The *Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland* may be obtained from DERM's internet site at www.derm.qld.gov.au, or by contacting DERM's Contaminated Land Unit. Please ensure that the appropriate statutory fees [as of 1 July 2008 \$1048.00 per lot listed on the EMR] is included with this application for the assessment of the site investigation and / or validation reports.

THIRD PARTY ADVICE MATTERS

Aboriginal Cultural Heritage Act 2003

The Department of Environment and Resource Management (DERM) also takes this opportunity to advise applicants of their responsibilities under the *Aboriginal Cultural Heritage Act 2003*. Under section 23 of the *Aboriginal Cultural Heritage Act 2003* a person who carries out an activity must take all reasonable and practicable measures to ensure the activity does not harm Aboriginal cultural heritage (the "cultural heritage duty of care"). Maximum penalties for breaching the duty of care are \$750,000 for a corporation and \$75,000 for an individual.

Applicants will comply with the duty of care in relation to Aboriginal cultural heritage if they are acting in accordance with cultural heritage duty of care guidelines gazetted under the *Aboriginal Cultural Heritage Act 2003*, available on the DERM website, or in accordance with an agreement

with the Aboriginal party for the area or a cultural heritage management plan approved under part 7 of the *Aboriginal Cultural Heritage Act 2003*.

Applicants are also encouraged to undertake a search of the Aboriginal Cultural Heritage Database and the Aboriginal Cultural Heritage Register, administered by the Cultural Heritage Coordination Unit, DERM. Application forms to undertake a free search of the Cultural Heritage Register and the Database may be obtained by contacting the Cultural Heritage Coordination Unit on (07) 3239 3647 or on the DERM website http://www.derm.qld.gov.au/cultural_heritage/index.html.

Enquiries:

Wade Micke

Contaminated Land

Department of Environment and Resource Management

PO Box 15155 CITY EAST QLD 4002

Tel: (07) 3330 5695

Email: wade.micke@derm.qld.gov.au

RTI DL RELEASE - EHP

Notice of Response to Information Request

Greyhounds Queensland Ltd
C/- ML Design
GPO Box 714
BRISBANE QLD 4001

DERM Reference: IC0410BEE0020_LOG6122_347288

Senior Officer (Planning and Assessment)
Beenleigh Planning – South East Region
Department of Environment and Resource Management
32 Tansey Street, Beenleigh, Qld 4207
PO Box 1164, Beenleigh, Qld 4207

Dear Sir/Madam

APPLICATION FOR MCU & OPWKS OVER LOT 658 ON SL12298 (KINGSTON ROAD, SLACKS CREEK)
– LOGAN CITY COUNCIL - RESPONSE TO INFORMATION REQUEST

I am responding to your Information Request by:

- ☐ Enclosing all of the information requested.
- ☐ Enclosing part of the information requested and asking that the requesting authority proceed with the assessment of the application.
- ☐ Advising that I do not intend to supply any of the information requested and asking that the requesting authority proceed with the assessment of the application.

Signed

_____[Signature]

_____[Print name]

_____[Date]

Robin Wagland

From: Wicks, Jeremy J (SKM) [JWicks@skm.com.au]
Sent: Friday, 21 May 2010 4:14 PM
To: Robin Wagland
Cc: Graham, Rick A (SKM)
Subject: Cronulla Park, Amended Draft Site Investigation Report
Attachments: Cronulla Park Stage 2 Report_G.docx; Response to TPR Comments_Report Version E_V2.pdf; 09-002-007 MACH1 TPR Comments Site Investigation Report Cronulla Park-28-01-10.pdf; Appendix A to B.pdf

Robin

We are now underway again with Cronulla Park. The attached pdf file provides a summary of how we have addressed your comments in the Draft Report. Where changes have been made to the Draft report, these are shown as tracked changes in the word document. I have also re-attached your comments fyi.

There have been some changes to the proposed development, the key ones being the inclusion of a second storey to the main building, and a inner running track. The new layout is shown in the plans in Appendix A and B.

I will be attaching the remaining appendices in a separate email and will call you to discuss.

Best regards

Jeremy Wicks
Senior Environmental Consultant
GeoSpatial Section Manager (Acting)

Sinclair Knight Merz
Ph: +61 7 3026 7526
Mob: +61 7 3026 7526 - Mobile phone
Fax: +61 7 3026 7306
32 Cordelia Street, South Brisbane Qld 4101
PO Box 3848, South Brisbane Qld 4101

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Sinclair Knight Merz
32 Cordelia Street
South Brisbane QLD 4101 Australia
PO Box 3848
South Brisbane QLD 4101 Australia

Tel: +61 7 3026 7100
Fax: +61 7 3026 7300
Web: www.skmconsulting.com

Robin Wagland
Mach1 Environmental
PO Box 320
Ferny Hills, Qld 4055

21 May 2010

*Response to TPR Comments_Report Version
E_V2.docx*

Dear Robin,

Response to TPR Comments “Contaminated Site Investigation, Logan Greyhound Racing Facility, Cronulla Park”

Please find enclosed a copy of the revised Draft Contaminated Site Investigation Report for Cronulla Park. The report has been revised based on your comments received in January 2010. The changes which have been made to the report are documented for your reference in Attachment 1.

Yours sincerely

Jeremy Wicks
*Senior Environmental Consultant
GeoSpatial Section Manager (Acting)*

Phone: 3026 7526
Mobile: 49-Sch4 - Mobile phone
E-mail: jwicks@skm.com.au

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Attachment 1 – Response to Comments

Section 2.3

Paragraph 1, – ‘DERM’ – Please write in full for the first use to assist in reader interpretation.

- Edit incorporated.

Section 2.4

Paragraph 3 – ‘RL’ - Please write in full for the first use to assist in reader interpretation.

- Reference deleted.

‘RL 22.2 m’ – Should this be m AHD?

- Edit incorporated.

Section 2.7

Paragraph 2 – ‘recreational purposes’ – Please specify what recreation.

- Paragraph amended to “Following closure of the Landfill, the site has been used for open space recreational purposes by the general public, such as bike riding, and dog walking. The current configuration of the site does not provide park facilities such as seating, cooking, and playgrounds which would encourage frequent use of the site from families and small children.”

Table 2-1 – ‘1973 – varying uses’ – Please specify what uses.

- Sentence amended to “Distinct zones of activity (areas of disturbed land) can be seen across the site, however the nature of activity (e.g. type of waste material being disposed) within each zone cannot be determined.”

Section 2.8 Paragraph 1 – ‘CMPS&F Report’ – Has this report been previously submitted to DERM? Is there a statutory declaration from an SQP accompanying this report? Have SKM verified the data from this report?

- The report was provided to SKM as part of the Logan City Council (LCC) environmental records of the site. The Report was prepared for LCC, and does not



make mention of submission to the Department of Environment and Resource Management (DERM), or of an accompanying Statutory Declaration.

Given the age of this report, the data contained within has been unable to be verified. Recommendations made within the body of the report such as removal of the underground storage tank and the installation of landfill vents have been confirmed where possible. Note of this has been made within the body of the SKM report.

Section 2.8.1

Paragraph 2, Sentence 3 – ‘received the site’- Typo.

- Phrase amended to “...received at the site....”

Waste Acceptance Section – Please note what information this was based on.

- Reference to CMPS&F Report incorporated into text.

Section 2.8.2

Paragraph 3 – ‘discussions with LCC’ – Please note with whom and when.

- Reference incorporated.

Table 2-3, Point 7. – ‘tank has been removed’ – Has this subsequently been verified by SKM?

- Verification of the removal the removal of the UST has not been undertaken by SKM as part of the Contaminated Site Investigation, and will need to be undertaken as part of the remediation/redevelopment of the site as described in Section 9.

Section 2.9.1

Paragraph 2 – ‘HIL-F’ – How did they compare with HIL- A or D?

- The analytical results were below the NEPM HIL-D assessment criteria for parkland and open space, and subsequently do not pose a risk to human health in the current land use.

Results have not been compared to NEPM HIL-A as these criteria are not reflective of land use at the site and are therefore not considered relevant.

Section 2.9.2

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Paragraph 1 – ‘weathered sandstone’ – Earlier it is mentioned that there may be 10.5m of waste (Section 2.8.1), yet these wells are only 4.4-8.4m deep, on this basis would they not still be in the waste? Please explain/clarify.

- Sentence amended to “Based on the location of the wells either on the other side of the drainage channel or within the vegetated area to the west of the site, it is considered likely that the monitoring wells targeted groundwater in the weathered sandstone.”

Table 2-4 – Please reference the Assessment Criteria used in the table. A section on the criteria used would be useful before the discussion of any results.

- A list of the Assessment Criteria has been included in the text, however the reader is directed to the summary of the criteria and their applicability which was provided in Sections 4.3.1 and 4.3.2.

Nitrate Section – ‘concentrations of nitrate’ – Of what and when?

- Sentence amended to “Although variable over time, higher concentrations of nitrate have generally been found in the samples from CR13 in comparison to the groundwater samples from monitoring wells CR14 and CR15.”

TPH Section, Paragraph 2 – Has this been demonstrated through silica gel clean-up and analysis?

- Paragraph amended to “Additional testing to confirm the nature or species of the hydrocarbons was not undertaken as part of the LCC monitoring program. However it should be noted that through the investigation undertaken in 2009, the TPH measured may be comprised of non-polar based organic substances present in landfill leachate which were being generated through the decomposition of putrescible waste materials rather petroleum products, for reasons outlined in Section 7.2.3.”

Section 2.9.4

Paragraph 1, Sentence 2 – How are these wells constructed? Do they have sealed gas taps to provide suitable readings of gas?

- Sentence added. “The CMPS&F Report indicates that these wells were constructed to allow gas monitoring, and included measures such as appropriately screened intervals and specialised free venting well caps.”



Section 4

Paragraph 1, Sentence 1 – ‘The section’ – Should this be ‘This’.

- Amended.

Section 4.3.1

Paragraph 1 – ‘commercial’ – Should this be ‘recreation’ as well?

- The ultimate configuration of the site conforms to the assumptions of the Exposure Scenario of a “Commercial/Industrial” land use, including the following.
 - o The site will have restricted access by the public, including fencing around the perimeter of the site and public access hours supervised by employees of GQL.
 - o Although there will be large areas of grass and unsealed surfaces, these will not be readily accessible to children or other users of the site with the exception of grounds workers.

Subsequently, adoption of the Exposure Setting HIL-D is not considered appropriate in this context.

Potential Contaminants in Groundwater, Paragraph 2 – ‘will be controlled’ – How will this be controlled?

- Addition of phrase “... by fencing...”

Table 4-2 – ‘TPH C10-C40’ – Note QLD DERM utilise a guideline of 500ug/L for Total TPH in groundwaters.

- The Netherlands Ministry of Housing, Spatial Planning and Environment's *Circular on target values and intervention values for soil remediation* (2000) (“the Dutch Guidelines”) have been used for TPH; the guideline consider both the risk to human health and the environment. The guideline value is 600 µg/l and is considered appropriate for the investigation, and note that unpublished DERM guideline referred to would not alter the findings or conclusions of the investigation.

Landfill Gases Section, Paragraph 2 – ‘5% concentration’ - Where has this criteria been derived and is it an accepted value within QLD? Please provide a reference.

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- This value has been referenced in Section 4.2.2, and is taken from the *Qld EPA Guidelines ERA 75 (Waste Disposal) – Landfill Siting, Design, Operation and Rehabilitation (ERA 75)*.

Section 5.1

What about a site inspection and anecdotal evidence.

- Amended.

Point number 3) – ‘existing’ – Typo.

- Amended.

Point number 4) – Full stop.

- Amended.

Point number 5) – ‘NATA’ - Please write in full for the first use to assist in reader interpretation.

- Amended.

Point number 7) – How were the wells installed? Did these have sealed caps and a near surface bentonite seal? ‘and’ – Should this be at the end of bullet point 2?

- Well installation details are described in detail in Section 5.2. Given this, the description of well installation provided within the scope of works is deemed sufficient in this instance.

Section 5.2

Groundwater wells section, Paragraph 1 – It would be useful to note to what depth the wells were installed.

- Table of construction details included.

Paragraph 2 – ‘concrete’ – Just concrete or a concrete bentonite slurry mix? A slurry mix provides a better seal as concrete can crack, shrink and is porous.



- Amended.

Section 5.3

Was a PID used to screen the shallow soils? If so how was this calibrated and please provide calibration records. If not, please explain why not.

- Sentence included. "Soil samples were screened using a photo-ionisation detector (PID) for the presence of volatile hydrocarbons. No detects were noted in any sample across the site."

Calibration certificates have been included in Appendix D-5.

Section 5.4

Paragraph 2 – What gases were measured? How was the gas meter calibrated? Please provide calibration certificates.

- Footnote included. "Including methane, oxygen, carbon dioxide, carbon monoxide and hydrogen sulphide."

Calibration certificates have been included as Appendix D-5.

Section 5.5

Paragraph 1 – 'were recorded' – Using what equipment? Was this calibrated? Please provide calibration records.

- Amended.

Calibration certificates have been included as Appendix D-5.

Section 6.1

Waste Material section – What type of waste? What % of waste? What % of putrescible?

- Paragraph amended. "The thickness of waste materials encountered varied from 1.2 m to 10.5 m. Where encountered, waste materials (30-90%) were found to be mixed in a damp to saturated grey unconsolidated clay or sandy clay matrix (10-70%). The waste intersected in the investigation was domestic in origin, and appeared to contain little, if any, residual putrescible wastes. Common items noted in the waste materials included



plastic packaging, plastic bags, metal fragments and glass bottles. No regulated wastes were noted in the waste material intersected.

As per the Sample Analysis Plan prepared by SKM, the objective of the investigation was not to characterise waste materials disposed of within the landfill.”

Section 6.2

Paragraph 5 – Are there similar water chemistry for other parameters?

- Sentence included. “Concentrations of metals were generally consistent between samples from MW06 and MW09. Water quality indicators did not show any real correlation between samples.”

Section 7.1

Footnote 11 – What about nickel as noted in Table 7-1?

- Amended.

Table 7-2 – Should there be a footnote to correspond to (m)1?

- Amended to “mbgl”.

Footnote 13 – What about nickel as noted in Table 7-1?

- Amended.

Section 7.2.1

Table 7-3 – Figure 2 seems to show MW02 and MW03 in off-site locations, please clarify.

- It is debatable whether MW02 and MW03 intersect the Landfill or just fill materials. The conservative approach has been taken in this instance and the locations have been assumed to be within the landfill.

Paragraph 3 – ‘weather’ – Typo.

- Amended.

Table 7-4 – Figure 2 seems to show CR15 partly in the landfill, please clarify.

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- CR15 is located on the southern side of the drainage channel and not within the Landfill.

Paragraph 6 – ‘monitoring wells’ Please specify off-site wells to avoid confusion.

- Amended.

Paragraph 7 – ‘weather’ – Typo.

- Amended.

Section 7.2.2

Tables 7-5 and 7-6 and future tables – See earlier comment on locations.

- Amended.

Paragraph 5 – ‘metals occur’ – What is the likely source of these metals?

- Sentence included. “The sources of these metals are unknown, and are potentially derived from industrial sources in the vicinity of the site, or naturally occurring within groundwater. Notwithstanding this...”

Section 7.2.3

Paragraph 4 – What about a comment on the higher levels of TPH beneath the landfill compared to within the landfill?

- Sentence included. “Concentrations of TPH were generally higher in samples from down-gradient groundwater monitoring wells when compared to samples of perched water from monitoring wells located around the boundary of the Landfill. Whilst not directly sampled in this investigation, high concentrations of TPH would also be expected to be found in perched water within the central parts of the Landfill.”

Section 7.2.4

Paragraph 2 – ‘downgradient of’ – Or do you mean downgradient within the landfill, as the downgradient off-site well has no detections?

- Amended to “....and from groundwater samples from down-gradient monitoring wells within the Landfill.”



Section 7.3

Historical Monitoring section, Paragraph 1, Sentence 1 – ‘wells installed’ – How are these wells installed? Do they have sealed gas caps or are they free venting? Are the surface intervals of these wells installed with at least 1m depth of bentonite seal to prevent surface cross-circuiting?

- Paragraph amended. “... monitoring wells fitted with free-venting gas well caps installed around the boundary of the site. Installation details of these wells are not available from LCC.”

Paragraph 1, Sentence 2 – ‘well below’ – What levels were detected? ‘5%’ – Please clarify is this 5% v/v, 5% of the LEL or 0.25% v/v?

- Sentence amended. “... concentrations which were well below the LEL for methane (5%) (refer to Section 2.9.4).”

Landfill Gas Monitoring section, Paragraph 1, Sentence 1 – ‘were installed’ – How?

- Sentence amended. “... were installed within the Landfill, as described in Section 5.2.”

Paragraph 2 – “Very high” – What levels? This is subjective wording.

- Wording “Very high” has been removed from the sentence. A summary of maximum concentrations encountered have been added to the text.

Paragraph 6 – ‘rate of flow’ – How was this measured?

- Paragraph amended. “The rate of flow was measured using a portable flow metre by Simtars prior to sampling at each location. The rate of flow varied within each perched...”

Landfill Vent Monitoring section, Sentence 3 – ‘concentration’ – Of what? ‘detection limit’ – What were the detection limits?

- Sentence amended. “...an elevated detection of methane which ...”

Section 8.1.1

Paragraph 2 – ‘0.5m’ – DERM guidelines suggest 1m of capping. Further discussion/justification is required.

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The majority of the site (approximately 93%) is comprised of an approximately 1 m thick capping layer which is consistent with the thickness required in the DERM guidelines, and is the area of the site which will be actively used post development (i.e. for greyhound racing).

The eastern embankment, which makes up about 7% of the site is covered in an 0.2-0.5 thick capping layer. It should be noted that this area of the site will not be used post development (i.e. it will remain as a grass embankment). It has been recommended that the thickness of the eastern embankment be increased to 0.5 m for the following reasons:

- The capping layer of the eastern embankment may be acting as a pathway for the venting of landfill gases. It is not recommended that a low permeability material be used to build up the embankment, or the thickness of the capping material be significantly increased. Such a change could detrimentally alter the landfill gas migration and venting regime along the embankment.
- The primary function of the capping layer along the embankment is considered to be a barrier to prevent the accidental uncovering of underlying fill material. A 0.5 m thickness capping layer is considered sufficient for this purpose.
- The building up of the capping layer to 1 m within the eastern embankment would not reduce the quantity or quality of leachate generated, or mitigate the discharge of leachate from the site.
- The embankment is also located adjacent to a drainage line. The building up the embankment may not be practicable as it may result in the need to relocate this drainage line into adjacent properties.

Section 8.1.2

Odour issues may also need to be considered as even below guideline levels odours can be present in landfill gas. Please mention or discuss.

- Sentence included. "Ambient odours from the landfill were not observed during the undertaking of the investigation. Accordingly with the capping layer in place, landfill odours are not expected to be nuisance or concern post development."

Section 8.2

Metals section – What is the likely source of the upgradient metals?



- Paragraph amended. "...of the site, however it is unknown whether the elevated levels are associated with surrounding industrial land use, naturally occurring background concentrations, or a combination of both these factors. Leachate..."

Ammonia section – What about ecological risks to aquatic ecosystems such as the Slacks Creek as ammonia is highly toxic to fish etc. Please discuss.

- Paragraph included. "Ammonia is a known toxicant to fish and can have a deleterious effect on aquatic ecosystem health. Given the distance of the site to the nearest receiving ecosystem (Slacks Creek, 320m east of the site), factors such as dilution would lower the concentration of ammonia prior to discharge to the Creek."

Summary of Findings section, Paragraph 2 – 'attenuated' – Or is this just dilution?

- Amended.

Section 9

Bullet point 3 – 'closed' – Is this during the construction phase? Please specify

- Phrase inserted. "...during the construction phase..."

Bullet point 5 – What is meant by 'sensitive construction'?

- The word "sensitive" has been deleted.

Section 9.1

How does this fit into the ERA 75 guidelines?

- Refer to comments on 8.1.1

Section 9.2

Main Facilities Building section, Paragraph 2, Sentence 2 – Note the design drawings in Appendix B show a basement feature. Please explain further how this will be vented.

- Note that the drawings detail a void beneath the ground floor, and not a basement structure. The incorporation of a void into the design will vent landfill gases and mitigate gas intrusion to enclosed spaces. No basement has been proposed as part of the development.



Kennel Block section, Bullet point 4 – How will this be constructed? How will this allow venting?

- The passive venting strategy for the Kennel Block is discussed in Section 9.2.

Paragraph 2, Sentence 1 – ‘may’ – Should this not be ‘will’?

- The preference is for additional gas monitoring to be undertaken as part of the detailed design to characterise the landfill gas regime within the cap where building are to be located. A decision on whether this is to proceed will be made in consultation with the Third Party Reviewer.

Section 9.3

Paragraph 1, Sentence 2 – Is this post construction?

- Phrase added. “...during the construction process.”

Section 9.5

This section would be better earlier before the discussions of any of the results.

- Comment noted.

Section 9.3

Piling section – ‘resealed’ – How will this be done? What about the preferential pathway potentially created in to the sandstone? Should these piles be advanced through a bentonite slurry casing?

- Paragraph added. “It is noted that groundwater within the sandstone is already affected by leachate generated from the landfill. The absence of an engineered clay liner over the site, and waste materials directly overlying the sandstone in parts of the site has resulted in connectivity between the landfill leachate and the groundwater in the sandstone. Therefore pathways already exist between the landfill leachate and the sandstone. Accordingly techniques involving the advancement of piles through bentonite slurry casing are considered unnecessary.”

Section 9.7

‘SMP’ – How does this fit in with ERA license requirements of LCC?

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- Logan City Council have been contacted about licensing, and they have confirmed that there is currently no ERA Licence over the site (R. Ferguson, 15/2/2010). As the site both operated and closed before the *Environmental Protection Act 1994*, there is no active ERA Licence.

Section 10.2

Groundwater section, Paragraph 3 – 'receptor of groundwater' – Should this also be surface water from the site?

- Sentence amended. "...of both groundwater and surface water from the..."

Section 10.3

Groundwater section, Paragraph 2, Sentence 4 – 'monitoring program' – What are the requirements of the LCC ERA license for monitoring? It is assumed that LCC will continue to take responsibility for this, please clarify. Will the SMP mention groundwater monitoring? This is not the preference of DERM, as it requires the polluter to be name etc.

- Sentence amended. "...controls for the site, and will be administered by LCC. The SMP will include groundwater and landfill gas monitoring at the site."
- Although the site is not currently operating under an ERA, LCC have been undertaking an environmental monitoring program to monitor offsite impacts.

Logan City Council has agreed that they will continue to administer ongoing monitoring under the SMP once approved.

Given that LCC have a long history of environmental monitoring at the site, this is not expected to be an issue with regard to open reporting. All data is also to be provided to GQL under the SMP to ensure that both owner and occupier have access to the data.

Section 10.4

RAP – Is a RP more appropriate?

- The document is now called a Remedial Plan

Section 11

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Need to also add additional references included in the text such as WHO Drinking Water, LCC data, Healthy Waterways 07 and 09, IPR Group, ERA guidelines, EP Act, QLD DERM guidelines, NOHSC, OSHA, CSIRO and SKM Infrastructure.

- References incorporated.

Figures

Figure 2 and 4

'Crunulla Court' – Typo.

- Figures have been corrected.

Figure 3

Scale bar states 1:750 at A1, yet scale in title is 1:750 and print out is A3 – please clarify/amend.

- Figure has been corrected.

Appendices

Appendix B

Note earlier comment about basement and venting. Check scales as only printed in A4 not A3 or A1 (Figure E1 and Figure 3). Note also Figure 3 states both A3 and A1.

- Figure has been corrected.

Appendix C

SKM logs record AO, A1, A2, A3 and B3 for PID, what do these mean? Golder's Logs – Was any PID screening undertaken? Were test pits really backfilled with bentonite grout? Douglas Partner borelogs 8/10-16/10/09 – Was a PID used for field screening? Were these boreholes installed for groundwater monitoring? If so what were the installation details and how were they sealed through the landfill? If not how were they backfilled to ensure the voids were sealed? Where is Bore 7 log?



- SKM borelogs present a qualitative assessment of visual/olfactory indicators of contamination. A Legend for interpretation is included in the footer. This column has been extended to include PID readings taken during the installation process.
- The geotechnical investigation undertaken by Golders included trenching part way through the capping material and advancing a small hand augured hole further through the cap for Talsma- Hallam Permeameter Testing. The hand augured holes were abandoned with bentonite grout, and then the surface of the test pit was reinstated using the original capping material.
- The Douglas Partners bore logs detailed both cored and SPT investigations. No PID readings were undertaken as part of this investigation, as this work was only geotechnical in nature. The diameter of the SPT boreholes was <75mm, and most boreholes collapsed as the rig was withdrawn. For these locations, no bentonite was used to abandon the boreholes.

Locations cored by Douglas Partners were backfilled using a bentonite grout. This is annotated on the logs.

Appendix D

Please reference the guidelines used in a footnote for all tables. Please also provide an additional appendix with calibration records for both the water quality and landfill gas meters.

- The guidelines used for each analyte are summarised in Section 4.3 of the report. The range of guidelines used is extensive and are referred to in the tables as the Human Health or Environmental Assessment Criteria to simplify their presentation.
- Calibration records have been included in Appendix D.5.

Appendix E

No COC documentation has been provided, please add for all datasets. For the final production of the appendix it would greatly help the reader if all the results were in order eg. COC, SRN then Analytical Report for each batch together and all pages are the same way around and not upside-down. Please note the comments provide in the QA/QC reports for EB0908932 and EB0903142 and provide comments. Also please note and comment on the non-conformances recorded in the SRNs for EB0907913, EB0908932 and EB0916017. Part of the analytical Report for Labmark Report 434258 is missing as is the SRN and COC.

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- COC's and the Labmark reports have been included. CoC's have been compiled in a separate section to the laboratory reports.
- QA/QC comments have been incorporated into the discussion.

Appendix G

Should this have a cover page for consistency? Table G-1 – Please comment on SRN non-conformances. DQO (G.1) suggests duplicates at a rate of 1 in 10, please confirm/clarify this has been completed. Please note the RPD exceedences. 'somewhat influenced the result' – How? If no split samples what was the Labmark data? Why were no split samples obtained. Also what about trip blanks as outlined in G.1?

- Cover page inserted.
- Sample receipt non conformances have been included:
 - “EB0907913 – Due to small volume of water achieved, sample MW08 did not have an appropriately preserved bottle for metals analysis. The analysis was continued based on the age of the sample (<6 hours) and the suitability of the unpreserved sample provided to ALS.
 - EB0908932 – Samples for MW07 have been annotated as being incorrectly preserved, however it is noted that the correct sample containers have been provided to ALS. Subsequently, the sample is considered to have been preserved appropriately for the analysis undertaken
 - EB0916017 – Due to the small volume of sample achieved from MW08, the requested analysis was unable to undertaken.”
- Sentence inserted. “A duplicate sample ratio of 1 per 10 samples has been achieved for the investigation.”
- Sentence amended. “... this may have led to difficulty in achieving homogeneous samples during this sample event.”
- Paragraph included. “Inter-laboratory duplicate samples were submitted for two sample events as part of this investigation. The RPDs for these samples were within an acceptable range. Analysis of split samples was not undertaken for the majority of the testing. The absence of split sampling is not expected to affect the data validity, given

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the proven data replicability, the results of the limited split sampling and the use of a NATA accredited laboratory for all analytical testing.”

- Reference to trip blanks deleted. Trip blanks are not considered necessary given the role of rinsate blanks in this investigation.

Appendix H

A north arrow should be included on the aerial photographs.

- Edit incorporated.

Appendix I

Point 1. – Use of the report should be extended to DERM and TPR.

- A separate letter will be prepared to extend the use of the report to DERM and the TPR.

RTI DL RELEASE - EHP

Rob Wagland

From: Robin Wagland [robin@mach1environmental.com.au]
Sent: Thursday, 28 January 2010 10:45 AM
To: 'JWicks@skm.com.au'
Cc: 'dbeavis@greyhoundsqueensland.com.au'
Subject: TPR Comments
Attachments: 09-002-007 MACH1 TPR Comments Site Investigation Report Cronulla Park-28-01-10.pdf

Jeremy,

I hope you had a good break over Christmas and the New Year.

Further to receipt of the SKM Contaminated Site investigation report for Cronulla park, please find attached my TPR comments.

I trust these are self explanatory and I look forward to your "tracked changes" version and/or responses.

In the meantime, feel free to call to discuss any aspects of my comments further.

All the best for 2010.

Kind regards,

Robin.

Robin Wagland
Principal
Third Party Reviewer

MACH1 Environmental Pty Ltd
Tel + 61 (0)7 3351 0468
Fax + 61 (0)7 3351 0351
Mob + 61 (0)7 3351 0351 - Mobile phone



Tel: +61 (0)7 3351 0468
Fax: +61 (0)7 3351 0351

PO Box 320
Ferry Hills, QLD 4055
www.mach1environmental.com.au

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The views, opinions, conclusions and other information expressed in this electronic mail are not given or endorsed by the company unless otherwise indicated by an authorised representative independent of this message.

EMAIL MEMO

TO:	<u>SKM Pty Ltd</u>	DATE:	<u>28/01/10</u>
ATTENTION:	<u>Jeremy Wicks</u>	JOB No:	<u>09-002-007</u>
FROM:	<u>Robin Wagland</u>	CC:	<u>Darren Beavis –</u>
No OF PAGES (include. this page):	<u>8</u>		<u>Greyhounds QLD</u>
By Email:	<u>JWicks@skm.com.au</u>		

MESSAGE: **TPR Contaminated Site Investigation, Logan Greyhound Facility**

Dear Jeremy,

MACH1 Environmental Pty Ltd (MACH1) have been commissioned by the Greyhounds Queensland Ltd (GQL) to undertake a Third Party Review (TPR) of the Sinclair Knight Merz Pty Ltd (SKM) 'Logan Greyhound Facility Contaminated Site Investigation' Report dated December 2009 Project No. QE09537. This report covers the investigation works undertaken at the Cronulla Park site. The site is described as Lot 658 on Plan SL12298, located at the corner of Compton and Kingston Roads, Slacks Creek, Queensland.

The TPR role is in accordance with the Department of Environment and Resource Management (DERM) guidelines outlined in the Terms of Reference¹. Robin Wagland has provided DERM with an application for the TPR role, however, upon discussions an appointment will not be made for an existing landfill under an ongoing Environmentally Relevant Activity (ERA) license. The TPR can still provide a review and approval (as appropriate) for any required DERM concurrence agency response for the site.

Background

The following memo outlines the TPR comments with respect to my review of the Investigation Report dated December 2009. The comments and advice outlined below are provided to assist GQL and SKM in finalising this report. The information should not be considered pre-emptive of the final TPR report submission and certification for the report or site, but rather represents the TPR opinions based on the current review of available site information.

¹ Terms of Reference for Third Party Reviewers for contaminated land assessment and management. Approved 15/2/08.

It is also noted that the work was undertaken within a specific scope between SKM and GQL, and as such is noted in this context.

Scope of Works

The TPR scope of work completed to date is as follows:

- DERM TPR application;
- Meetings with GQL, ML Design, SKM and various contractors;
- Site visit and meeting with SKM to confirm previous site information and verify current site conditions;
- TPR review of the SKM Interim Summary Report dated July 2009;
- Provision of comments for the above report;
- TPR review of the SKM Contaminated Site Investigation report (December 2009); and
- Provision of these comments for the above mentioned report.

TPR works still to be completed are the review of the final report and the production of the TPR Certification Report.

Please return the amended Report in Word format with track changes to enable a quicker review of the final document.

Contaminated Site Investigation Report Comments

The following comments relate to the TPR review of the report (December 2009). The comments are referenced to section numbers. All comments should be noted and addressed appropriately as follows:

General Comments:

- The final report must be accompanied by:
 - A statutory declaration;
 - Completed DERM application forms; and
 - A cheque made out to the DERM for the amount of \$1048/lot on the EMR (if applicable).
- The final report should be a signed original and should be accompanied by a bound copy for the TPR records.
- One of those signing the report and the one signing the statutory declaration must be a Suitably Qualified Person (SQP).
- Update the date on the front cover of the report. Also ensure that headers and footer dates and titles are updated (as necessary).

Detailed Comments:

Section 2.3

- Paragraph 1, – 'DERM' – Please write in full for the first use to assist in reader interpretation.

Section 2.4

- Paragraph 3 – 'RL' - Please write in full for the first use to assist in reader interpretation. 'RL 22.2 m' – Should this be m AHD?

Section 2.7

- Paragraph 2 – 'recreational purposes' – Please specify what recreation.
- Table 2-1 – '1973 – varying uses' – Please specify what uses.

Section 2.8

- Paragraph 1 – 'CMPS&F Report' – Has this report been previously submitted to DERM? Is there a statutory declaration from an SQP accompanying this report? Have SKM verified the data from this report?

Section 2.8.1

- Paragraph 2, Sentence 3 – 'received the site' Typo.
- Waste Acceptance Section – Please note what information this was based on.

Section 2.8.2

- Paragraph 3 – 'discussions with LCC' – Please note with whom and when.
- Table 2-3, Point 7. – 'tank has been removed' – Has this subsequently been verified by SKM?

Section 2.9.1

- Paragraph 2 – 'HIL-F' – How did they compare with HIL- A or D?

Section 2.9.2

- Paragraph 1 – 'weathered sandstone' – Earlier it is mentioned that there may be 10.5m of waste (Section 2.8.1), yet these wells are only 4.4-8.4m deep, on this basis would they not still be in the waste? Please explain/clarify.
- Table 2-4 – Please reference the Assessment Criteria used in the table. A section on the criteria used would be useful before the discussion of any results.
- Nitrate Section – 'concentrations of nitrate' – Of what and when?
- TPH Section, Paragraph 2 – Has this been demonstrated through silica gel clean-up and analysis?

Section 2.9.4

- Paragraph 1, Sentence 2 – How are these wells constructed? Do they have sealed gas taps to provide suitable readings of gas?

Section 4.

- Paragraph 1, Sentence 1 – 'The section' – Should this be 'This'.

Section 4.3.1

- Paragraph 1 – 'commercial' – Should this be 'recreation' as well?
- Potential Contaminants in Groundwater, Paragraph 2 – 'will be controlled' – How will this be controlled?
- Table 4-2 – 'TPH C10-C40' – Note QLD DERM utilise a guideline of 500ug/L for Total TPH in groundwaters.
- Landfill Gases Section, Paragraph 2 – '5% concentration' - Where has this criteria been derived and is it an accepted value within QLD? Please provide a reference.

Section 5.1

- What about a site inspection and anecdotal evidence.
- Point number 3) – 'existing' – Typo.
- Point number 4) – Full stop.
- Point number 5) – 'NATA' - Please write in full for the first use to assist in reader interpretation.
- Point number 7) – How were the wells installed? Did these have sealed caps and a near surface bentonite seal? 'and' – Should this be at the end of bullet point 2?

Section 5.2

- Groundwater wells section, Paragraph 1 – It would be useful to note to what depth the wells were installed.
- Paragraph 2 – 'concrete' – Just concrete or a concrete bentonite slurry mix? A slurry mix provides a better seal as concrete can crack, shrink and is porous.

Section 5.3

- Was a PID used to screen the shallow soils? If so how was this calibrated and please provide calibration records. If not, please explain why not.

Section 5.4

- Paragraph 2 – What gases were measured? How was the gas meter calibrated? Please provide calibration certificates.

Section 5.5

- Paragraph 1 – 'were recorded' – Using what equipment? Was this calibrated? Please provide calibration records.

Section 6.1

- Waste Material section – What type of waste? What % of waste? What % of putrescible?

Section 6.2

- Paragraph 5 – Are there similar water chemistry for other parameters?

Section 7.1

- Footnote 11 – What about nickel as noted in Table 7-1?
- Table 7-2 – Should there be a footnote to correspond to (m)¹?
- Footnote 13 – What about nickel as noted in Table 7-1?

Section 7.2.1

- Table 7-3 – Figure 2 seems to show MW02 and MW03 in off-site locations, please clarify.
- Paragraph 3 – ‘weather’ – Typo.
- Table 7-4 – Figure 2 seems to show CR15 partly in the landfill, please clarify.
- Paragraph 6 – ‘monitoring wells’ Please specify off-site wells to avoid confusion.
- Paragraph 7 – ‘weather’ – Typo.

Section 7.2.2

- Tables 7-5 and 7-6 and future tables – See earlier comment on locations.
- Paragraph 5 – ‘metals occur’ – What is the likely source of these metals?

Section 7.2.3

- Paragraph 4 – What about a comment on the higher levels of TPH beneath the landfill compared to within the landfill?

Section 7.2.4

- Paragraph 2 – ‘downgradient of’ – Or do you mean downgradient within the landfill, as the downgradient off-site well has no detections?

Section 7.3

- Historical Monitoring section, Paragraph 1, Sentence 1 – ‘wells installed’ – How are these wells installed? Do they have sealed gas caps or are they free venting? Are the surface intervals of these wells installed with at least 1m depth of bentonite seal to prevent surface cross-circuiting?
- Paragraph 1, Sentence 2 – ‘well below’ – What levels were detected? ‘5%’ – Please clarify is this 5% v/v, 5% of the LEL or 0.25% v/v?
- Landfill Gas Monitoring section, Paragraph 1, Sentence 1 – ‘were installed’ – How?
- Paragraph 2 – ‘Very high’ – What levels? This is subjective wording.
- Paragraph 6 – ‘rate of flow’ – How was this measured?

- Landfill Vent Monitoring section, Sentence 3 – ‘concentration’ – Of what? ‘detection limit’ – What were the detection limits?

Section 8.1.1

- Paragraph 2 – ‘0.5m’ – DERM guidelines suggest 1m of capping. Further discussion/justification is required.

Section 8.1.2

- Odour issues may also need to be considered as even below guideline levels odours can be present in landfill gas. Please mention or discuss.

Section 8.2

- Metals section – What is the likely source of the upgradient metals?
- Ammonia section – What about ecological risks to aquatic ecosystems such as the Slacks Creek as ammonia is highly toxic to fish etc. Please discuss.
- Summary of Findings section, Paragraph 2 – ‘attenuated’ – Or is this just dilution?

Section 9.

- Bullet point 3 – ‘closed’ – Is this during the construction phase? Please specify.
- Bullet point 5 – What is meant by ‘sensitive construction’?

Section 9.1

- How does this fit into the ERA 75 guidelines?

Section 9.2

- Main Facilities Building section, Paragraph 2, Sentence 2 – Note the design drawings in Appendix B show a basement feature. Please explain further how this will be vented.
- Kennel Block section, Bullet point 4 – How will this be constructed? How will this allow venting?
- Paragraph 2, Sentence 1 – ‘may’ – Should this not be ‘will’?

Section 9.3

- Paragraph 1, Sentence 2 – Is this post construction?

Section 9.5

- This section would be better earlier before the discussions of any of the results.

Section 9.3

- Piling section – ‘resealed’ – How will this be done? What about the preferential pathway potentially created in to the sandstone? Should these piles be advanced through a bentonite slurry casing?

Section 9.7

- 'SMP' – How does this fit in with ERA license requirements of LCC?

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Section 10.3

- Groundwater section, Paragraph 2, Sentence 4 – 'monitoring program' – What are the requirements of the LCC ERA license for monitoring? It is assumed that LCC will continue to take responsibility for this, please clarify. Will the SMP mention groundwater monitoring? This is not the preference of DERM, as it requires the polluter to be name etc.

Section 10.4

- RAP – Is a RP more appropriate?

Section 11.

- Need to also add additional references included in the text such as WHO Drinking Water, LCC data, Healthy Waterways 07 and 09, IPR Group, ERA guidelines, EP Act, QLD DERM guidelines, NOHSC, OSHA, CSIRO and SKM Infrastructure.

Figures

- Figure 2 and 4– 'Crunulla Court' – Typo.
- Figure 3 – Scale bar states 1:750 at A1, yet scale in title is 1:750 and print out is A3 – please clarify/amend.

Appendices

- Appendix B – Note earlier comment about basement and venting. Check scales as only printed in A4 not A3 or A1 (Figure E1 and Figure 3). Note also Figure 3 states both A3 and A1.
- Appendix C – SKM logs record AO, A1, A2, A3 and B3 for PID, what do these mean? Golder's Logs – Was any PID screening undertaken? Were test pits really backfilled with bentonite grout? Douglas Partner borelogs 8/10-16/10/09 – Was a PID used for field screening? Were these boreholes installed for groundwater monitoring? If so what were the installation details and how were they sealed through the landfill? If not how were they backfilled to ensure the voids were sealed? Where is Bore 7 log?
- Appendix D – Please reference the guidelines used in a footnote for all tables. Please also provide an additional appendix with calibration records for both the water quality and landfill gas meters.

- Appendix E – No COC documentation has been provided, please add for all datasets. For the final production of the appendix it would greatly help the reader if all the results were in order eg. COC, SRN then Analytical Report for each batch together and all pages are the same way around and not upside-down. Please note the comments provide in the QA/QC reports for EB0908932 and EB0903142 and provide comments. Also please note and comment on the non-conformances recorded in the SRNs for EB0907913, EB0908932 and EB0916017. Part of the analytical Report for Labmark Report 434258 is missing as is the SRN and COC.
- Appendix G – Should this have a cover page for consistency? Table G-1 – Please comment on SRN non-conformances. DQO (G.1) suggests duplicates at a rate of 1 in 10, please confirm/clarify this has been completed. Please note the RPD exceedences. 'somewhat influenced the result' – How? If no split samples what was the Labmark data? Why were no split samples obtained. Also what about trip blanks as outlined in G.1?
- Appendix H – A north arrow should be included on the aerial photographs.
- Appendix I – Point 1. – Use of the report should be extended to DERM and TPR.

I trust the above comments are useful to aid in completing the report. I look forward to receipt of the revised final version in "tracked changes" in due course. In the meantime, should you require any additional information or wish to discuss any aspects of the TPR comments, please do not hesitate to contact me further.

Kind regards,

49-Sch4 - Signature

.....
Robin Wagland
Third Party Reviewer
MACH1 Environmental Pty Ltd

Robin Wagland

From: Wagland, Robin (WSP Environmental, Milton)
Sent: Thursday, 20 August 2009 5:01 AM
To: JWicks@skm.com.au
Cc: 'dbeavis@greyhoundsqueensland.com.au'
Subject: 2-09-007 TPR comments Summary Report on Supp Site Investigation
Attachments: 2-09-007 TPR Comments Interim Summary report 2009 8 18.pdf

Jeremy,

To assist SKM in future reporting/planning, as TPR for the site, I thought I would send some comments on your Interim report (see attached).

Should you have any queries on the attached or wish to discuss any other aspects of the project, please do not hesitate to call.

Kind regards,

Robin.

Robin Wagland
Queensland Manager
WSP Environmental Pty Ltd

Level 1, 16 Douglas Street, Milton, QLD 4064
(PO Box 2261, Milton, QLD 4064)
Tel: +61 (0) 7 3367 4300
Fax: +61 (0) 7 3367 4399
Mob: +61 (0) 7 3367 4399 - Mobile phone
Website: www.wspenvironmental.com

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RTI/DL RELEASE - EHP



FACSIMILE

To: SKM
Attention: Jeremy Wicks
Fax No: 07 3026 7100
From: Robin Wagland
Date: 18 August 2009
Our Ref: 2-09-007
Pages: 3
Re: Interim Summary Report on Supplementary Site Investigation - TPR Review

Dear Jeremy,

WSP Environmental Pty Ltd (WSP) has been commissioned by Greyhounds Queensland Ltd (Greyhounds) to undertake a Third Party Review (TPR) of the Environmental Site Assessment for the former Slacks Creek Landfill site located on the corner of Compton and Kingston Roads, Slacks Creek, Qld.

The TPR appointment is under the Department of Environment and Resource Management (DERM) formerly the Queensland Environmental Protection Agency (EPA) guidelines outlined in the Terms of Reference¹ and Robin Wagland is the approved TPR for the Slacks Creek site.

Background

The following fax outlines the TPR comments with respect to my review of the SKM Interim Summary on Supplementary Site Investigation report dated July 2009. The comments and advice outlined below are provided to assist Greyhounds and SKM in finalising this report. The information should not be considered pre-emptive of the final TPR report submission and certification for the site, but rather represents the TPR opinions based on the current review of available site information.

¹ Terms of Reference for Use of a Third Party Reviewer (TPR) for assessment and management of site contamination. Approved 15/2/08.

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WSP Environmental Pty Ltd
16 Douglas Street Milton Qld 4064 PO Box 2261 Milton Qld 4064
Phone 07 3367 4300 Fax 07 3367 4399 Website: www.wspenvironmental.com

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Scope of Works

The TPR scope of work was as follows:

- DERM TPR application and DERM discussions;
- Initial site visit with SKM;
- Review of SKM Sampling Analysis Plan;
- Site visit to existing greyhound racing facility;
- Review of SKM Interim Summary Report on Supplementary Site Investigation Report; and
- Provision of comments for the above report.

TPR works still to be completed include:

- Production of a TPR Certification Report.

It should be noted that the TPR considers the SKM report to be of a generally acceptable quality for the purposes for which it was written. The TPR also appreciates that the works were undertaken within a specified scope agreed between SKM and Greyhounds, therefore the following summary is to be noted within this context. All comments should be noted and addressed in the final report appropriately as follows:

General Comments:

- The final report must be accompanied by:
 - A statutory declaration;
 - Completed EPA application forms; and
 - A cheque made out to the EPA for the amount of \$1048/lot.
- The TPR requires 1 x copy and 1 x copy for DERM submission.
- Update the date on the front cover of the report. Also ensure that headers and footer dates and titles are updated (as necessary).
- Footnote 1 on page 2, footnote 7 and 8 on page 6 – requires a full stop at end of sentence.
- Footnote 6 on page 5 – requires a full stop at end of bullet point 1 and 2. Bullet point 2 also has a close bracket but no open bracket. Please amend.

Detailed comments:

Section 4.2

- Paragraph 1 – 'groundwater' – Should this be surface water?
- Paragraph 3 – How do two wells in the same aquifer demonstrate a connection between two aquifers? Should MW09 reference be MW05?
- Paragraph 4 – Last sentence – Please explain further.
- Paragraph 5 – 'Perched groundwater' – Is this reflected in the results? What is the implication of this?
- Inorganic Contaminants Paragraph 1 – 'be influenced by the landfill' – Seems a sweeping statement – does council data back this up?
- Inorganic Contaminants Paragraph 2 –
 - Correct 'landfill' to 'Landfill'.
 - What is the implication of this?

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- Organic contaminants Paragraph 1 – What is the implication of this?
- Organic contaminants Paragraph 5 –
 - 'groundwater' – Is it not already in the groundwater?
 - 'Slacks Creek' – How far is Slacks Creek and how can you demonstrate it will not be impacted? What is the extent of groundwater impact?

Section 4.3

- Paragraph 1 – 'findings indicate that gas' – Will this still be the case if the cap is enhanced to reduce infiltration.
- Paragraph 3 – 'detected in ambient air' – It is unlikely to ever record methane in ambient air.
- Paragraph 4 – 'portion of the methane' – If this is the case then gas samples should be taken for laboratory analysis, though it would be unlikely to form a large proportion and volatile hydrocarbons also presents a level of risk in themselves.

Section 5

- Bullet point 1 – Insert 'a' into 'includes a clay'.
- Bullet point 4 – Will require more justification but in principle acceptable.
- Bullet point 6 sub point 2 – 'well constructed' – Need to clarify.

Figure 1

Is there a 'MW06'? Or should 'MW05' location be 'MW06'?

Soil Analytical Results Table

- Where are the rest of the results?

I trust the above comments are useful to aid SKM in preparing the final report for the former Slacks Creek Landfill located on the corner of Compton and Kingston Roads, Slacks Creek, Qld. I look forward to receiving a final version of the report in due course. In the meantime, should you require any additional information or wish to discuss any aspects of the TPR comments, please do not hesitate to contact me further.

Kind regards,

49-Sch4 - Signature

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Robin Wagland
Third Party Reviewer
WSP Environmental

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 Phone 07 3367 4300 Fax 07 3367 4399 Website: www.wspenvironmental.com

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Robin Wagland

From: Wagland, Robin (WSP Environmental, Milton)
Sent: Friday, 24 April 2009 10:27 AM
To: Jeremy Wicks
Subject: Cronulla Park SAP

Jeremy,

I have reviewed your SAP document and have the following minor comments for you to note during your work:

- Section 2.2 1b) - It is suggested you place a >0.5m of bentonite/cement slurry seal from the surface to avoid short circuiting.
- Section 2.2 5a) - It is suggested you add methane to the gas analysis.
- Section 2.5 - It will be a requirement for the TPR to review these methods before completion of the final report. It is also suggested you add copies of these to the appendices of the final report.

I trust the above assists in moving forward.

Let me know plan for next week and I'll try to come out near the end of the drilling work.

Should you have any queries on the above, please do not hesitate to contact me further.

Kind regards,

Robin.

Robin Wagland
Queensland Manager
WSP Environmental Pty Ltd

Level 1, 16 Douglas Street, Milton, QLD 4064
(PO Box 2261, Milton, QLD 4064)
Tel: +61 (0) 7 3367 4300
Fax: +61 (0) 7 3367 4399
Mob: +61 (0) 49-Sch4 - Mobile phone
Website: www.wspenvironmental.com

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