ATTACHMENT 10

Contamination Remediation Strategy

Prepared by:

Range Environmental Consultants



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Our Reference: J001375

Date: 6 April 2023

Contamination Remediation Strategy for 15 Anderson Street, Fortitude Valley

Dear James,

This letter presents the contamination remediation strategy for the proposed redevelopment at 15 Anderson Street, Fortitude Valley (hereafter 'the site'). The site is formally described as Lot 10 on SP208752. The site is proposed to be redeveloped for a mixed high-density residential and commercial land use that will include a residential tower, shop, food and drink outlets.

The contamination remediation strategy was required to address Item 6(a) of a Further Advice letter issued by the Department of State Development, Infrastructure, Local Government and Planning (DILGP).

Environmental Management Register

The site was included on the Department of Environment and Science's (DES) Environmental Management Register (EMR) for Notifiable Activity 29 (petroleum product or oil storage), Notifiable Activity 31 (printing), Notifiable Activity 20 (landfill) and for hazardous contaminants (lead, mercury, zinc, and benzo(a)pyrene) affecting soil. The site was not included on the Contaminated Land Register (CLR).

The EMR search result stated that the site was suitable for a commercial/industrial land use with minimal opportunities for soil access providing that it was managed in accordance with the approved Site Management Plan (SMP). A Remediation Action Plan (RAP) was included with the EMR search result that provided the framework for remediation and management of contaminated soil to manage the potential human health and ecological risks in a proposed future high-density residential land use setting.

Previous Investigation Findings

The key findings of the Range Environmental (2022) contaminated land Preliminary Site Investigation (PSI) for the site are presented below:

- An underground storage tank (UST) currently occurs in the south-western carpark at the site.
- Previous investigations by Butler Partners reported elevated concentrations of lead and zinc in soil to depths of 2.7 m below ground level (mbgl). Butler Partners (2002) also reported ash material in the soil profile to depths of up to 1.1 mbgl.
- Six (6) potential high-risk areas or Areas of Environmental Concern (AEC) were identified from the site history and land use analysis together with observations made during the site inspection. The AEC included underground storage tanks (UST), historic printing works, historic buildings, imported fill material, historic disturbance.
- There were elevated concentrations of lead reported in the upper soil profile (0-1 mbgl) in the western extent of the site. There was also elevated Benzo(a)pyrene (BaP) reported in ash material located adjacent to the onsite UST.
- Perched groundwater was identified in one (1) borehole. There were elevated hydrocarbons reported in the groundwater sample at this location.
- There were data gaps and uncertainties that were not able to be addressed due to the preliminary nature of this investigation and due to site access and timing constraints.

Strategy to Demonstrate Site Suitability

To obtain a Site Suitability Statement (SSS) stating that the site is suitable for its proposed future land use, Range Environmental will develop and implement the following contamination remediation strategy:

- Prepare and implement a Sampling and Analysis Quality Plan (SAQP) that includes detailed investigation of the site following demolition of onsite structures. The objective would be to adequately characterise the soil and groundwater condition and delineate the lateral and vertical extent of contamination at the site.
- Prepare a Remediation Action Plan (RAP) (or update the existing RAP) that incorporates previous investigation findings and findings of the detailed site investigation. The RAP will be incorporated into the proposed earthworks program for the site redevelopment. The RAP is expected to include:
 - Removal of the existing UST.
 - Excavation and offsite disposal of contaminated soil.
 - Validation sampling.
- Outcome 1: If the condition of the site following remediation is consistent with the policy criteria for EMR removal, an application will be made for a SSS that states that the site is suitable for any land use (EMR removal).
- Outcome 2: If the condition of the site following remediation is not consistent with the policy criteria for EMR removal, an application will be made for a SSS that states that the site is suitable for a high-density residential land use, subject to complying with an updated Site Management Plan (SMP).

This contamination remediation strategy is consistent with the RAP currently held by the DES for the site.

Please note that the works will be endorsed by a Contaminated Land Auditor acting under the EP Act.

Yours sincerely,

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Sam Donald Principal Consultant Suitably Qualified Person (SQP) under Section 564 of the *Environmental Protection Act 1994* Range Environmental Consultants

PLANS AND DOCUMENTS referred to in the PDA DEVELOPMENT APPROVAL

