

1078-L-045-B

22/01/2020

Neil Gabriel  
Head of Group Property ANZ APAC  
George Weston Foods Limited  
PO Box 587, NORTH RYDE BUSINESS PARK NSW 1670  
Via Email: [neil.gabriel@gwf.com.au](mailto:neil.gabriel@gwf.com.au)

**RECEIVED**  
10.02.2020  
**TOOWOOMBA**  
**REGIONAL COUNCIL**

Dear Neil,

**RE: GWF MORT STREET, TOOWOOMBA SITE – RESIDENTIAL AREA**

I am the appointed, certified Contaminated Land Auditor for land contamination investigations being carried out on lands owned by George Weston Foods Limited (GWF) surrounding a former abattoir site, located at Mort Street, Cranley, Toowoomba.

Consultant Golder Associates Pty Ltd (Golder) has undertaken land contamination investigations of the GWF lands (which total approximately 70 ha) in two distinct parts which are referred to as the “CS1 Area” site and the “Residential Area” site. For consistency, this terminology is used herein.

The CS1 Area, located west of Mort Street, comprises two allotments (Lot 4 SP199163 & Lot 972 AG3561). Previously, Golder undertook land contamination investigations of the CS1 Area that were documented in *Environmental Site Assessment – Historical Car Park, West of Mort Street, Toowoomba (CS1) for George Weston Foods Limited*, dated September 2019. My review of this document was reported in *GWF Mort Street, Toowoomba Site – CS1 Area, letter report prepared by Lloyd Consulting Pty Ltd for GWF, dated 23 September 2019, Reference: 1078-L-029*.

The subject of this current letter report is the Residential Area. The Residential Area (the site) comprises 16 allotments, located east of Gowrie Creek, which are currently paddocks used for cattle grazing. The cadastral description of the site is as follows:

- 213-369 Goombungee Road, Harlaxton, QLD: Lot 1, 2, 3, 4, 5, 6 and 7 on RP17530, Lot 409 on D1020, and Lot 12 on SP199160; and
- 65-103 Griffiths Street, Harlaxton, QLD: Lot 12, 13, 14, 15 and 16 on RP17530; and
- 6-14 Bacon Street, Harlaxton, QLD: Lot 10 on RP17530, and Lot 411 on RP810590.

In relation to the Residential Area, I have reviewed a preliminary investigation report prepared by Golder for the adjacent land (a former abattoir)<sup>1</sup>, inspected the site on 12 September 2019 with Golder & GWF representatives, and reviewed the following document prepared by consultant Golder relating to the investigation of land contamination:

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<sup>1</sup> Golder (April 2015) Preliminary Site Investigation - Former Don KRC Plant, Mort Street, Toowoomba. Prepared for George Western Foods Limited. Report No. 147633127-001-R-RevA.

- **Environmental Site Assessment and Remediation Plan Paddocks East of Gowrie Creek (RESI), Former Don KRC Abattoir, Mort Street, Cranley for George Weston Foods Limited,** Ref: 1894222-004-R-Rev0, dated 17 January 2020 (the report).

Based on review of information provided in this report, I provide the following review advice:

- **Dual objectives:** The report is understood to have two main objectives. The first is to ultimately support removal of Lot 409 Plan D1020 (and any other lots that are listed) from the EMR; Lot 409 Plan D1020 is currently the only one of the 16 allotments comprising the site that is currently listed on the contamination registers (EMR or CLR)<sup>2</sup> maintained by the Department of Environment and Science (DES). The second objective is to provide sufficient and relevant land contamination assessment information, for the whole of the site, that confirms its suitability for the intended future residential use.
- **Report not a CLID:** The report is considered to generally accord with industry practice in relation to contaminated land investigations in Queensland and to accord with stated project requirements. I note, however, that the report does not currently constitute a Contaminated Land Investigation Document (CLID) that meets the requirements of s.389 of the *Environmental Protection Act 1994* (EP Act). It is understood that that a CLID will be prepared for Lot 409 Plan D1020 (and any other lots that are listed), in due course, once remediation and validation works are completed and that the CLID will be submitted to DES for the purpose of obtaining a regulatory decision in relation to land contamination.
- **Interim audit advice:** As a corollary to the point above, this letter represents interim review advice only, provided within the scope of the audit process, as it pertains to interim site investigation information and remediation works planning. It does not represent a statutory contaminated land certification performed under the provisions of s.568 of the *Environmental Protection Act 1994* (EP Act).
- **Soil sampling and testing density:** The consultant identifies in the report that the number of soil sampling locations implemented is currently less than that stipulated by the requirements of Australian Standard AS4482.1-1999<sup>3</sup> due to "...the low contamination risk assessment from site history review...". I understand that the consultant's remediation and validation plan for the site will ultimately, address any further testing requirements, in accordance with applicable standards and guidelines, for the purposes of preparing a final site remediation and validation report for the site, including a CLID(s) for land parcel(s) listed on the EMR.

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<sup>2</sup> Environmental Management Register (EMR) or Contaminated Land Register (CLR)

<sup>3</sup> Table E1 Minimum Sampling Points Required for Site Characterization Based on Detection of Circular Hot Spots Using Square Grid. AS4482.1-1999

- **Groundwater assessment:** The report identifies exceedances of nominated investigation levels for chromium, zinc and ammonia within groundwater samples collected from the site and recommends that further groundwater monitoring and risk assessment be undertaken, as part of the site remediation and validation works program. It is noted that the report does not currently establish remedial goals / risk acceptance criteria for the groundwater contaminants identified. I understand that such goals / acceptance criteria will be developed and presented, as part of the remediation and validation works program.
- **Soil disposal permits:** It is noted that lots not currently listed on the EMR, but are identified, during the conduct of the site remediation works, to contain contaminated soil that is proposed to be removed from those lots for remediation purposes, will need to be listed on the EMR, in order to obtain a valid soil disposal permit from DES. Once listed, such lots will ultimately be subject to CLIDs for their subsequent removal from the EMR.
- **Asbestos contamination:** It is noted that Lot 409 Plan D1020 is currently listed on the EMR for being subject to a hazardous contaminant - asbestos as fibre bundles. I understand that the consultant's proposed remediation and validation plan for the site will address further investigation and validation works, that accord with applicable standards and guidelines, for lots on which asbestos containing materials are identified, for the purposes of preparing a final site remediation and validation report for the site, including a CLID(s) for land parcel(s) listed on the EMR.
- **Further requirements for CLID:** Further to the above points, it is noted that additional work will be required to augment the current report, to ultimately prepare a CLID that meets the requirements of s.389 of the EP Act, for submission to DES to obtain a regulatory decision for removal of Lot 409 Plan D1020 (and any other lots that are listed) from the EMR. Additional works would need to include (but not necessarily be limited to):
  - Completion of remediation of the identified waste burial areas and incorporation of the results of these works and associated soil validation testing across these areas and the balance of the site, in accordance with applicable standards and guidelines; and
  - Incorporation of the findings of post-remediation groundwater monitoring and risk assessment, addressing the potential risks associated with contaminants (including ammonia) identified in groundwater, for the drinking water exposure pathway, given groundwater usage for potable purposes is known in the area and in relation to potential ecological risks associated with contaminants identified (i.e. nitrogen compounds and heavy metals).

Based on and subject to, the above considerations, I concur with the conclusions and recommendations and the remediation and validation plan presented in the report, as providing an appropriate basis for proposed forward works, in line with the stated project objectives. Please do not hesitate to contact me, should you have any queries, or require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "T. Lloyd".

**Trevor Lloyd**  
**Director & Principal / Contaminated Land Auditor (Att.)**

# Certificate

**Environmental Protection Act 1994**  
**Certificate of Approval - Auditor**  
**Approval No: CLAD06648919**

*This certificate of approval as an auditor is issued by the chief executive<sup>1</sup> pursuant to section 573 (2)(a) of the Environmental Protection Act 1994.*

**1. Approved person**

Mr Trevor Lloyd

**2. Approved auditor functions**

The approved person is approved to perform auditor's functions under s.568(b) of the *Environmental Protection Act 1994*.

**3. Term of approval**

This approval will remain in force until 18/07/2022 unless it is earlier cancelled or suspended.

**4. Conditions of approval**

The approved person must:

- continue to hold professional indemnity insurance for at least \$5 million dollars of cover
- comply with the most recent version of the Queensland Auditor Handbook for Contaminated Land, Module 4: Code of Professional Conduct
- have and maintain an expert support team whose support and advice can be obtained when the auditor is not an expert in any of the competencies and proficiencies listed in Schedule B9 of the National Environment Protection (Assessment of Site Contamination) Measure 1999.



Signature

8 August 2019

Date

**Chris Loveday**

Director, Operational Support  
Department of Environment and Science  
Delegate of the chief executive  
*Environmental Protection Act 1994*

Enquiries:

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<sup>1</sup> The Director-General of the Department of Environment and Science is the chief executive under the *Environmental Protection Act 1994*.