



9 April 2015

Andrew Miller
Section Manager – Contaminated Sites Branch
Department of Environment Regulation
Locked Bag 104
Bentley Delivery Centre WA 6983

Dear Mr Miller

FORRESTFIELD-AIRPORT LINK APPROACH TO CONTAMINATED SITES AND ACID SULFATE SOIL MANAGEMENT

Thank you for your time on 12 March 2015 to discuss the Forrestfield-Airport Link (FAL) project. Below is a summary of the key discussion points of the meeting.

BACKGROUND

Department of Environment Regulation (DER) accredited Contaminated Sites Auditor (CSA) Jason Clay has been engaged by the PTA to undertake a voluntary contaminated sites audit of the FAL project. The scope of the audit to date (i.e. the pre-construction Phase 1 and 2 investigation works) has included contaminated sites and Acid Sulfate Soil (ASS). This approach was previously discussed and agreed with the DER.

The purpose of our recent meeting was to discuss and agree how contaminated sites and ASS will be managed and regulated pre-, during and post-construction. The PTA's proposed approach is presented below.

AUDITOR REQUIREMENT

A mandatory contaminated sites audit may be triggered by the following scenarios, each of which is foreseeable:

- Development approvals for stations or other infrastructure contain conditions relating to the investigation and management of contamination.
- The project is formally assessed by the Environmental Protection Authority with conditions of approval relating to the investigation and management of contamination.
- The DER deems that a mandatory audit is required due to the scale and complexity of the project.



WORK TO DATE

The PTA commissioned GHD in 2013 to undertake the Phase 1 works. This included a Preliminary Site Investigation (PSI) of the proposed rail alignment and development of Sampling and Analysis Plans (SAP) for contaminated sites and ASS. The PSI and SAPs were reviewed and endorsed by the CSA. These reports were provided to the DER and the Department of Health (DoH).

The PTA commissioned Golder Associates in 2014 to undertake the Phase 2 works. This included preparation of an addendum to the SAPs based on new project design information and to ensure consistency with the amended National Environment Protection (Assessment of Site Contamination) Measure 1999 and all associated schedules. The SAP addendum was reviewed and endorsed by the CSA. The SAP addendum was provided to the DER and DoH.

CURRENT WORKS

Golder Associates are currently completing the Phase 2 works and preparing a Detailed Site Investigation (DSI) report which covers contaminated sites and ASS. This report will be subject to CSA review and endorsement and will be provided to the DER and DoH.

FUTURE WORKS

Pre-Construction (2015-2016)

Additional site investigation for contamination and/or ASS may be required based on the findings and recommendations of the DSI. Should additional site investigation be warranted, the PTA will commission a suitably qualified consultant to undertake these works. The works would be subject to review and endorsement by the CSA. The DER will be advised of the scope and timing of any additional site investigation.

The following plans related to the management of contamination and ASS will be prepared prior to construction. These plans will be prepared by the lead construction contractor and approved by the relevant stakeholder as listed below.

Plan	Approving Agency	Informed of Plan Approval
Spoil and Contamination Management Plan	CSA	DER
Acid Sulfate Soil & Dewatering Management Plan	DER	CSA

The DER will be provided with a copy of the Spoil and Contamination Management Plan once approved by the CSA.

Construction (2016-2020)

Contamination related matters will be regulated by the CSA during construction. Matters relating to ASS will be subject to regulation by the DER. Where direct crossover between contamination and ASS exists, both the CSA and the DER will be involved. The proposed scope of the CSA during construction is listed below.

- CSA to undertake two site based audits per year during major earthworks and dewatering.
- CSA to be provided with the lead construction contractor's environmental reports. This will include but not be limited to information on excavation volumes, spoil disposal records, ASS treatment/validation, unexpected finds and associated management actions, groundwater levels/quality.
- CSA to conduct an annual compliance audit. Information used to inform the audit will include findings of site based audits, the lead construction contractor's environmental reports, contractor generated audit reports and PTA generated audit reports on the contractor.
- CSA to review and endorse updates to the Spoil and Contamination Management Plan.
- CSA to be notified of significant contamination related incidents.

Post-Construction (2020-2021)

Upon completion of construction, a contaminated site investigation will be undertaken and a final DSI report will be prepared. The Conceptual Site Model and Risk Assessment in the final DSI will be based on the end land use. The final DSI will be subject to CSA review and endorsement. A Final Auditor Report with the CSA's conclusions and recommendations regarding suitability of use will be prepared. The final DSI report and the Final Auditor Report will be provided to the DER (and if required the DoH) for endorsement.

An ASS Close Out Report will also be prepared at the completion of construction. This report will be provided to the DER for review and endorsement.

CONCLUSION

The PTA requests your confirmation of the proposed approach to the management and regulation of contaminated sites and ASS on the FAL project as outlined in this letter. If you have any questions or require any further information, please do not hesitate to contact me on 9326 3927.

The PTA wishes to thank you for your ongoing assistance on this landmark project.

Kind Regards,

Paul Monaghan
A/ENVIRONMENTAL MANAGER