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November 11, 2021

Planning Department
City of Monash
293 Springvale Rd,
Glen Waverley, VIC 3150

Subject: Environmental Auditor Verification of Workplan for Zone 1 Temporary Boundary Venting Measures Huntingdale Estate at 1221-1249 Centre Road and 22 Talbot Avenue, Oakleigh South, Victoria

I, Mr Kenneth N Mival of EHS Support Pty Ltd, an Environmental Auditor (appointed pursuant to the Environment Protection Act 1970; 'the Act'), have been further requested by Huntingdale Estate Nominees Pty Ltd (the Owner) to review and verify the acceptability of the Proposed Workplan for the Zone 1 temporary boundary venting measures required to permit preloading of uncontrolled fill in that portion of the development located at 1221-1249 Centre Road and 22 Talbot Avenue, Oakleigh South.

Further to my letter of 8 October verifying the suitability of the workplan, we have been provided with an updated plan for further review. I now refer to the revised document provided titled "Workplan for Zone 1 Temporary Boundary Venting Measures" located at Huntingdale Estate: 1221-1249 Centre Road and 22 Talbot Avenue, Oakleigh South, Victoria prepared for Huntingdale Estate Nominees by Tetra Tech Coffey Pty Ltd Reference ENAUBTF00751AA_R11_Rev04.doc - dated 11 November 2021.

As the Environmental Auditor for the site appointed by the Owner on 31 July 2013, as notified to EPA (EPA Audit References SO No. 8004092 & Carms. No. 70403) and having completed the Environmental Audit for the site issued on 14 May 2020, I have reviewed the above updated documentation for consistency and compliance with the conditions included in the relevant Statement of Environmental Audit for Zone 1 of the site (the SoEA), the Construction Environment Management Plan attached to that SoEA and, where relevant - the closed landfill guidelines and policies.

I also refer to my previous verification of the original Workplan for Zone 1 Temporary Boundary Venting Measures dated 14 December 2018 in my letter to the Planning Department of the City of Monash of 21 December 2018, and to subsequent verifications of updated Workplans in my letters to the City of Monash of 22 January and 8 October 2021.

I have also considered the revised workplan for consistency with my previous reviews and verifications and in relation to minor changes that have been made in the design of the vent outlets and previously in the location of the intervention measures and the design of the preloading within Zone 1.

Whilst the site was audited under the provisions of the Environment Protection Act 1970, I have also considered the updated workplan for consistency with the intent of the provisions of the new Environment Protection Act (2018) regarding Environmental Values and General Environmental Duties.

Whilst the environmental audit completed in 2020 arrived at the conclusion that the current risk to future residents and site occupants and to those living adjacent to the site was at that time low and acceptable, it was also recognized that this could change due to backfilling and construction



activities. The construction of temporary boundary intervention measures was therefore endorsed in the conditions of the Statement of Environmental Audit. I have therefore reviewed the further revised workplan in relation to the conditions included in the Statement of Environmental Audit as relevant to Zone 1.

My review of the updated workplan revision Rev04 dated 11 November 2021 indicated no changes that I consider may potentially increase the risk to neighboring properties provided that it is installed in accordance with the design put forward and also complies with the requirements of the Construction and Environment Management Plan attached to the Statement of Environmental Audit prepared for Zone 1.

It is considered that the updated proposed workplan complies with Conditions 5a and 5b of the Statement of Environmental Audit (SoEA) for Zones 1 & 2A and also complies with Section 5.5 of the Conceptual Design of Site Management Measures (CDSMM) dated 1 May 2020 endorsed by the Environmental Audit and attached to the SoEA.

As also stated in the Landfill BPEM (EPA Publication 788.3, 2015), the objective and required outcomes for landfill rehabilitation include the following items, and are listed with the Auditor's comments (in blue text) on the verification of their status in relation to the required outcomes of the Landfill BPEM:

d) Must include an assessment of landfill cap performance on all cells to determine if current capping at the premises:

ii) Is sufficient to allow any landfill gas management measures to achieve compliance with the landfill gas action levels in Table 6.4 of the Landfill BPEM.

✓ verified – Tetra Tech Coffey in the updated workplan have taken into account the proposed design of the landfill cap; the existing landfill cap/stockpiling construction and performance with regard to Landfill Gas Management in Section 2.1 of the workplan and the potential for LFG migration in Section 2.2.

Tetra Tech Coffey have also allowed for the subsequent monitoring of landfill gas requirements in Section 5 of the Workplan with reference to relevant guidelines and in compliance with the provisions of the CDSMM.

As the cap, previously constructed at the time of landfill closure, would not meet present day standards set in the former or most recent version of the Landfill BPEM, or in accordance with EPA approval or a former licence condition, Section 5 of the Workplan has provided for the monitoring of the effectiveness of the temporary landfill gas venting measures against the requirements of EPA Publication 1684, the Landfill Gas Fugitive Emissions Monitoring Guidelines. These are the appropriate guidelines in the circumstances and reference the objectives and action levels of the Best Practice Environmental Management (Siting, Design, Operation and Rehabilitation of Landfills) (EPA Publication 788.3).

Section 5.1 of the workplan also requires the monitoring of LFG within the gas monitoring bores located at regular intervals at appropriate intervals along the western boundary between the intervention trench and the boundary. Section 5.2 of the workplan has also allowed for continuous monitoring at five points along the boundary between the boundary



and the interception trench to provide further assurance that any migration beyond the trench is detected immediately should it occur.

The workplan has also included in Table 2 consideration of an appropriate methodology to manage potential changes in landfill gas migration from vertical to horizontal by the construction of the proposed temporary venting trench to manage potential landfill gas risks to within acceptable limits, which is considered by the Auditor to be an acceptable measure based on the information provided for the audit and from review of the landfill gas monitoring reports documented in the audit report and subsequently reported in May 2021.

It is also understood that these are temporary measures to assist in the establishment of soil stockpiles as pre-loading in Zone 1 of the site, and that additional permanent measures may also be required in the future during development of the site once a permit is provided by Council.

All other conditions of the SoEA and any updates to the CEMP and CDSMM must be complied with during construction and future occupation of each part of the site and all buildings verified for compliance by an Environmental Auditor appointed under the Environment Protection Act 2018.

On the basis of the above - I HEREBY DECLARE that I am of the opinion that:

- The Workplan (Revision Rev04 dated 11 November 2021) is in accordance with the conditions included in the Statement of Environmental Audit; the guidance provided in EPA Publication 1684 the Landfill Gas Fugitive Emissions Monitoring Guidelines and where relevant the Closed Landfill Guidelines (Publication 1940.1); and the aftercare requirements of the Best Practice Environmental Management (Siting, Design, Operation and Rehabilitation of Landfills) (EPA Publication 788.3).
- The owner's risk approach and proposed monitoring program are also considered to be sufficient to enable the owner and EPA to determine compliance with the conditions included in the SoEA and the provisions of the relevant guidelines, to allow effective management of potential risks of fugitive landfill gas migration at the site. It is also considered to be consistent with the intent of the new Environment Protection Act (2018) and General Environmental Duties of the site owner/developer.
- The verification process is based on the Auditor's opinion regarding the status of the closed landfill at the time of the environmental audit and having regard to the requirements of relevant policies or documents published by EPA (or guidelines, codes of practice etc. of other relevant bodies).

Dated: 11 November 2021

Signed:

A handwritten signature in blue ink, appearing to read 'K. Mival', with a small checkmark at the end.

Kenneth N Mival
EHS Support Pty Ltd
ENVIRONMENTAL AUDITOR
(APPOINTED PURSUANT TO THE ENVIRONMENT PROTECTION ACT 1970)



Limitations

This verification letter has been prepared in accordance with the Environment Protection Act 2018. The Environmental Audit reference SO No. 8004092 & Carms No. 70403, dated 14 May 2020 and the attached Statements of Environmental Audit referenced by this letter, represented the Auditor's opinion of the environmental condition of the site and its suitability for proposed beneficial uses at the date the Statements were signed.

It is acknowledged that this verification letter may be used by Huntingdale Estate Nominees, by the Environment Protection Authority and by the Department of Environment Land Water and Planning and the City of Monash, in reaching conclusions about the proposed site development. The scope of work performed in connection with the verification may not be appropriate to satisfy the needs of any other person and is limited to consideration only of the extent of compliance with the conditions included in the relevant Statement of Environmental Audit. Any other person's use of, or reliance on, this document, or the findings, conclusions, recommendations or any other material presented to them, is at that person's sole risk.

In forming an opinion, the Auditor has relied on information supplied by Huntingdale Estate Nominees Pty Ltd Development and their environmental consultants Tetra Tech Coffey and previously existing information contained in the environmental audit report completed for the site by this Auditor, as supplemented by his own review of the information provided as listed in this letter. The Auditor has taken this information to represent a fair and reasonable characterisation of the proposed workplan and temporary works in relation to current conditions at the site, within the limitations of the investigation as stated herein. No investigation, in practice, can be thorough enough to preclude the presence of materials on the subject property that presently, or in the future, may be considered hazardous. The actual characteristics of subsurface and surface materials may vary significantly between adjacent test points and sample intervals and at locations other than where direct observation, measurement or exploration have been made. Due to often-changing regulatory evaluation criteria, concentrations of contaminants present and considered to be acceptable may, in the future, become subject to different regulatory standards.

Opinions and judgements expressed herein, which are based on the Auditor's understanding and interpretation of current regulatory standards, should not be construed as legal opinions.

Whilst to the best of our knowledge information contained in this verification letter is accurate at the date of issue, subsurface conditions, including groundwater levels can change in a limited time. Therefore, this verification letter and the information contained herein should only be regarded as valid at the time of the audit report completion unless otherwise explicitly stated in this report. In the event that changes in conditions on or near the site either exist or occur after the date of signing of this letter or the prior Statements of Environmental Audit, the Auditor disclaims responsibility for the occurrence or ownership or effects of such conditions or materials, whether they are hazardous or otherwise.

Except as required by law, no third party other than those stated above, may use or rely on this verification letter unless otherwise agreed by EHS Support in writing. Where such agreement is provided, EHS Support will provide a letter of reliance to the agreed third party in the form required by EHS Support.

To the extent permitted by law, EHS Support expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this letter. EHS Support does not admit that any action, liability or claim may exist or be available to any third party.



EHS Support does not represent that this verification letter is suitable for use by any third party. Except as specifically stated in this section, EHS Support does not authorise the use of this letter by any third party.

It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the relevant property.