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Attention: The General Manager

Northern Beaches Council
PO Box 82
Manly NSW 1655

SLR Project No.: 630.031691.00005

Client Reference No.: 22259

**RE: Statement of Environmental Effects
UPSS Tank Replacement and Site Upgrade Works
238 Condamine Street, Manly Vale NSW 2093**

1.0 Introduction

SLR Consulting Australia Pty Ltd (SLR) acts on behalf of its client, Ampol Australia Petroleum Pty Limited (Ampol), in preparing this supporting Statement of Environmental Effects (SEE) for proposed upgrade works at the service station located at 238 Condamine Street, Manly Vale NSW 2093.

This SEE describes the site, its environs, the proposed works and provides an assessment of the proposal in terms of the matters for consideration under Section 4.15(1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act 1979). The report should be read in conjunction with the supporting information appended to this letter.

1.1 Site History

A search of Northern Beaches Council's online DA tracker has found the following applications pertaining to the subject site:

- DA2000/3781 – Retail Image Upgrade (Caltex to Ampol) – Submitted 15/02/2000;
- MOD2000/3781/1 – Modification to Retail Image Upgrade (Caltex to Ampol) – Submitted 10/12/2001; and
- DA2021/1684 – Alterations and additions to an existing service station – Submitted 07/10/2021.

2.0 Site and Surrounds

The site is located on the corner of Condamine Street and Koorala Street within Manly Vale, a suburb of the Northern Beaches Council Local Government Area (LGA). The site is commonly known as 238 Condamine Street, Manly Vale NSW 2093 and is legally identified as Lot 23 DP819441. The site has an area of approximately 1,570m². The site is located on land zoned R3 Medium Density Residential under the *Warringah Local Environmental Plan 2011*.

The site comprises buildings and hardstand areas (impervious surfaces) associated with the existing service station use. These buildings include the retail shop, fuel court (with canopy), storage containers as well as signage. There is a landscaping strip located along the eastern boundary.

The site has two road frontages, including a 42m primary frontage to Condamine Street and 38m secondary frontage to Koorala Street. Condamine Street is a state classified road. Site access is provided solely off Condamine Street via two driveways.

The surrounding land uses comprise a mixture of residential and commercial activities. The site is bound to the north and east by gated residential complex. Commercial and retail premises are located west of the site across Condamine Street and south of the site across Koorala Street. Refer to Figure 1 and 2 for site aerial and site cadastre.

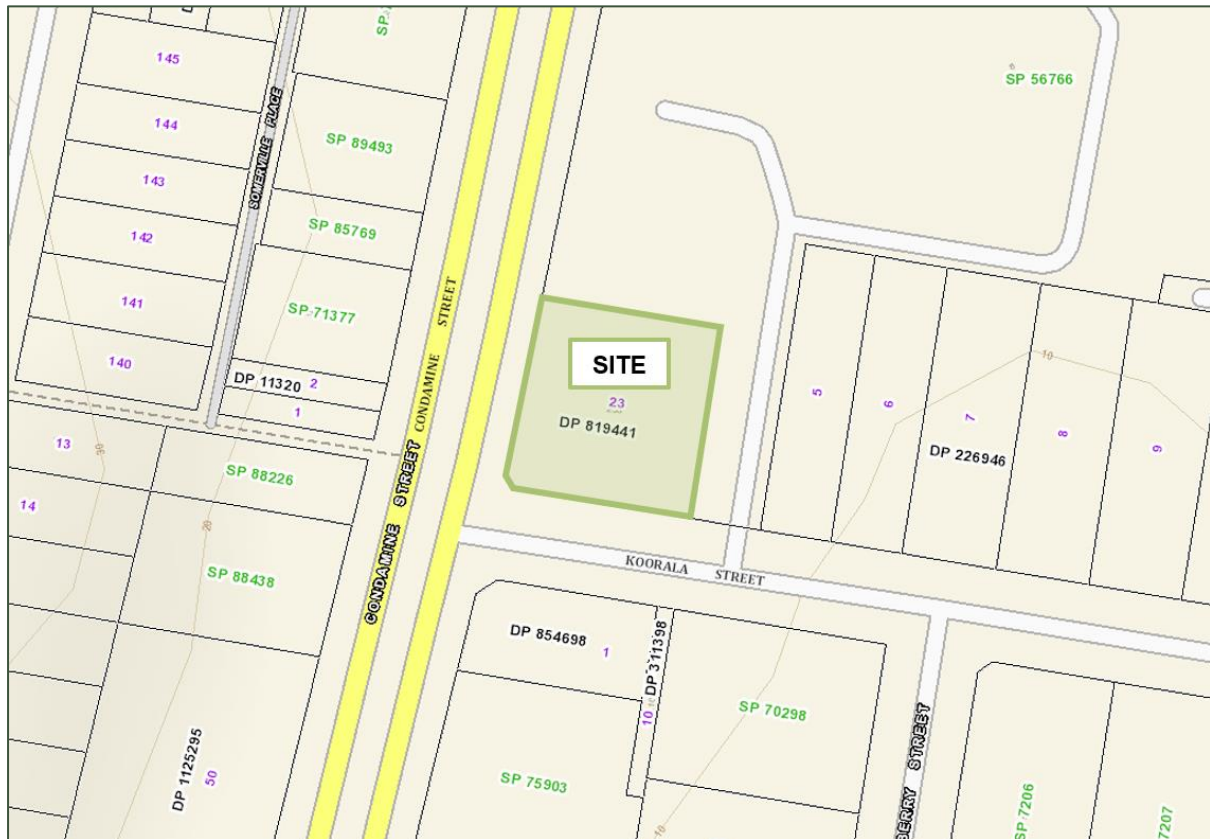
Photo 1 View of the site from Condamine Street (Source: Google Street View)



Figure 1 Site Aerial (Source: Nearmap)



Figure 2 Site Cadastre (Source: SIX Maps)



3.0 Proposal

The following works form part of the proposal:

- Removal of five (5) Underground Petroleum Storage System (UPSS) tanks;
- Installation of two (2) 60kL compartmentalised UPSS tanks;
- Installation of one (1) underground oil/water separator;
- Replacement of fuel dispensers, hoses, and pipework;
- Decommissioning and removing of the existing vent pipes to be replaced with new vent pipes;
- Resurfacing of the fuel forecourt, crossovers and hard stand areas post UPSS tank installation;
- Construction of an enclosed bin storage area, measuring 4.2m by 3m with a sloping roof with a maximum height of 2.7m, on a new concrete slab; and
- Other minor works as identified on the Architectural Plans at **Appendix A**.

It is noted there are no works proposed to the existing convenience store, fuel canopy, or approved signage. There are also no changes to operational management, including trading hours.

3.1 Demolition/Tank Removal

The proposal seeks to remove and replace all underground fuel storage tanks and fuel dispensers in accordance with the Architectural Plans at **Appendix A**. Tank removal will



comply with Australian Standard *AS4976-2008 - The removal and disposal of underground petroleum storage tanks*. The existing car parking and convenience store are not subject to demolition and removal works.

3.2 Remediation

The primary objective of the proposal is to upgrade the existing fuel infrastructure of the premises by installing new tanks, lines, and associated infrastructure. In accordance with tank decommissioning standards, soil testing and validation works are to be undertaken to comply with NSW Environmental Protection Authority (EPA) guidelines, with any discovered contamination to be remediated.

If land contamination is identified, the 'duty to notify' provisions of the *Contaminated Land Management Act 1997* will be considered and addressed as required. A decommissioning validation report will be provided to Council within 60 days of tank decommissioning. The report will be prepared by a duly qualified person with experience describing the processes used to decommission the system, assessing the extent of land contamination, and describing any remediation work carried out.

Any remediation works will be performed in accordance with *State Environmental Planning Policy (Resilience and Hazards) 2021* (refer to Section 4.5) and the site-specific Remediation Action Plan (refer to **Appendix C**).

3.3 Fuel Storage Details

There are currently several UPSS tanks in operation on the site, all of which are designated for removal. The new UPSS tanks comprises two (2) fiberglass double wall 60kL tanks will likely contain the following approximate fuel volumes:

- 35kL of E10;
- 35kL of P-95A;
- 25kL of P-98A; and
- 25kL of premium car diesel.

The final compartment size and fuel volumes may be subject to change, noting however that any change will not have any additional environmental impact or affect how the tank is managed.

The design and installation of the UPSS will comply with *AS 4897-2008 The Design, Installation and Operation of underground petroleum storage systems* and with the *Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulations 2019* and *Protection of the Environment Operations (Clean Air) Regulation 2021*.

3.4 Vehicular Access and Parking

Vehicular access, general circulation and onsite parking will generally be unaltered by the proposal (albeit repaired and resealed upon completion of work). Safe and efficient tanker tracking is proposed as demonstrated in the Architectural Plans.

None of the works proposed are anticipated to change the efficiency and safety of general vehicular access, parking, and circulation onsite.



3.5 Erosion and Sediment Control

The proposed works will be conducted in accordance with *Managing Urban Stormwater – Soils and Construction, March 2004*. Refer to the Architectural Plans for erosion and sediment controls.

3.6 Construction Management

A Construction Management Plan (CMP) will be prepared and submitted to the Certifier for approval prior to the issue of the Construction Certificate.

4.0 Relevant Legislation and Planning Controls

The following Environmental Planning Instruments (EPIs) and Development Control Plan (DCP) are relevant to the proposed development:

- *Environmental Planning and Assessment Act 1979*;
- *Contaminated Land Management Act 1997*;
- *Protection of the Environment Operations (Underground Petroleum Storage Systems Regulations) 2019*;
- *Protection of the Environment Operations (Clean Air) Regulations 2021*;
- *State Environmental Planning Policy (Resilience and Hazards) 2021*;
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*;
- *Warringah Local Environmental Plan 2011*; and
- *Warringah Development Control Plan 2011*.

4.1 Environmental Planning and Assessment Act 1979

This proposal is subject to the provisions of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Section 4.15(1) of the EP&A Act provides criteria which a consent authority is to take into consideration, where relevant, when considering a DA. An assessment of the subject development, in accordance with the relevant matters prescribed under Section 4.15(1), is provided within Section 5.0 of this SEE.

4.1.1 Division 4.11 Existing Uses

Pursuant to Division 4.11 Existing Uses, the service station relies on existing use rights for ongoing permissibility. Regulations respecting existing uses, including the carrying out of alterations or extensions to an existing use, are detailed in **Section 4.2**

4.2 Environmental Planning and Assessment Regulation 2021

4.2.1 Clause 163 Certain Development Allowed

(1) *An existing use may, subject to this Part—*

- (a) *be enlarged, expanded or intensified, or*
- (b) *be altered or extended, or*
- (c) *be rebuilt, or*



(d) be changed to another use, but only if the other use is a use that may be carried out with or without development consent under the Act, or

(e) if it is a commercial use—be changed to another commercial use, including a commercial use that would otherwise be prohibited under the Act, or

(f) if it is a light industrial use—be changed to another light industrial use or a commercial use, including a light industrial use or commercial use that would otherwise be prohibited under the Act.

The proposal is considered to maintain the existing use of the premises under Clause 163(b), as the works constitute alteration.

4.2.2 Clause 165 Alteration of Buildings and Works

(1) Development consent is required for an alteration of a building or work used for an existing use.

(2) The alteration must be—

(a) for the existing use of the building or work and for no other use, and

(b) erected or carried out only on the land on which the building or work was erected or carried out immediately before the relevant day.

The proposed alterations pertain to the existing use and will be carried out on land which the use operates upon. It is noted that enlargement, expansion and intensification of existing uses is permitted under this clause, however, the proposed tank replacement works are not considered to intensify the operational capacity of the service station. Instead, these works aim to ensure tank infrastructure in line with current standards.

4.2.3 Land and Environment Court Planning Principle: Existing Use Rights Merit Assessment

The proposal is assessed against the four questions which usually arise in the assessment of existing use rights developments, as below:

1) *How do the bulk and scale (as expressed by height, floor space ratio and setbacks) of the proposal relate to what is permissible on surrounding sites? (Principle 1)*

“While planning controls, such as height, floor space ratio and setbacks do not apply to sites with existing use rights; they have relevance to the assessment of applications on such sites. This is because the controls apply to surrounding sites and indicate the kind of development that can be expected if and when surrounding sites are redeveloped. The relationship of new development to its existing and likely future context is a matter to be considered in all planning assessment.”

Response: The proposed alterations primarily concern the replacement of underground fuel tanks with minimal change to the scale, setback, bulk or height of the site. The proposal therefore satisfies this principle.



2) What is the relevance of the building in which the existing use [sic] takes place? (Principle 2)

“Where the change of use is proposed within an existing building, the bulk and scale of that building are likely to be deemed acceptable, even if the building is out of scale with its surroundings, because it already exists. However, where the existing building is proposed for demolition, while its bulk is clearly an important consideration, there is no automatic entitlement to another building of the same floor space ratio, height or parking provision.”

Response: As described above, the proposed alterations will have minimal impact on the built form. The proposed works are largely underground and pertain to the removal and replacement of fuel infrastructure, which will not change the bulk and scale of the main building. The proposal therefore satisfies this principle.

3) What are the impacts on adjoining land? (Principle 3)

“The impact on adjoining land should be assessed for all development. It is true that where, for example, a development control plan requires three hours of sunlight to be maintained in adjoining rear yards, the numerical control does not apply. However, the overshadowing impact on adjoining rear yards should be reasonable.”

Response: The proposed works are largely underground and will be safely managed to ensure external areas are unaffected. As such, the proposed alterations will not have an unreasonable impact on neighbours. The proposal therefore satisfies this principle.

4) What is the internal amenity? (Principle 4)

“Internal amenity must be assessed as it is assessed for all development. Again, numerical requirements for sunlight access or private open space do not apply, but these and other aspects must be judged acceptable as a matter of good planning and design. None of the legal principles discussed above suggests that development on sites with existing use rights have lower amenity than development generally.”

Response: The proposed alterations uphold the existing amenity and functionality within the site and for the adjoining lands. The proposal therefore satisfies this principle.

As established, the proposed UPSS replacement works at the service station are consistent with the merit assessments established by the Land and Environment Court existing uses.

4.3 Contaminated Land Management Act 1997

The *Contaminated Land Management Act 1997* establishes a process for investigating and remediating land which the EPA considers to be contaminated significantly enough to require regulation under Division 2 of Part 3.

A Remediation Action Plan (RAP) has been prepared by Tetra Tech Coffey in the instance that contamination is discovered (refer to **Appendix C**). The RAP specifies that hydrocarbon impacted, or otherwise contaminated, soil in the vicinity of the fuel infrastructure is to be removed. In these instances, refer to Section 6.0 of the RAP for contingency management protocols.



It is emphasised that Ampol has engaged qualified, independent environmental consultants to undertake validation during these works in accordance with relevant legislation and the site-specific RAP. Given the site will continue to be used for petroleum activities, there would not ordinarily be a requirement for a Site Audit Statement (SAS) which can only be prepared and signed off by an EPA accredited site auditor. Additionally, there is no provision under the UPSS Regulation which would incur the requirement of a SAS.

4.4 Protection of The Environment Operations (Underground Petroleum Storage Systems) Regulation 2019

The proposed works will be conducted in accordance with Division 1 Installation of new storage systems and undertaken by a suitably qualified consultant. The system will include the equipment specified by *AS 4897–2008: The design, installation and operation of underground petroleum storage systems*, including a leak detection system in accordance with Part 3 of this Regulation.

Part 4 – Use of Regulation requires a fuel system operation plan to be in place prior to the use of a storage system containing petroleum. A fuel system operation plan will be prepared in compliance with EPA guidelines. It will be reviewed and updated as required and a copy will remain onsite at all times.

Furthermore, a UPSS tank validation report shall be prepared once the works are complete and subsequently submitted to Council. The purpose of the validation report is to document the procedures and results of the UPSS tank removal, soil excavation and validation activities and to illustrate that the site is suitable for continued use as a service station. The validation report will also include documentation for all soil disposed off-site and material imported to the site.

4.5 Protection of the Environmental Operations (Clean Air) Regulation 2022

The upgrades to the tanks and bowsers will comply with the necessary requirements prescribed under 'Division 2 Petrol service stations, Subdivision 2 Petrol dispensers – Stage two vapour recovery' of this Regulation.

4.6 State Environmental Planning Policy (Resilience and Hazards) 2021

4.6.1 Chapter 3 Hazardous and Offensive Development

Chapter 3 aims to ensure that in considering any application regarding potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions which reduce or minimise any adverse impact.

A Preliminary Risk Screening Report conducted by SLR (refer to **Appendix D**) has found the proposal to comply with *State Environmental Planning Policy (Resilience and Hazards) 2021* requirements. It is noted that the storage of petroleum is considered a potentially hazardous industry. The screenings for storage of dangerous goods indicate that the development would not be classified as a hazardous or offensive industry. Additionally, as the existing and continued use of the site are the same, it is not considered to pose an increased risk to the surrounding locality.



4.6.2 Chapter 4 Remediation of Land

Chapter 4 aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Specifically, Clause 4.7 (Remediation work permissible) states:

- (1) A person may carry out a remediation work in accordance with this Chapter, despite any provision to the contrary in an environmental planning instrument, except as provided by section 4.16(3).*
- (2) A person must not carry out a category 1 remediation work except with the consent of the consent authority.*
- (3) A person may carry out a category 2 remediation work without the consent of the consent authority.*
- (4) A person who carries out a remediation work must ensure that section 4.13 (if it applies) and sections 4.14 and 4.15 are complied with in relation to the work.*

In accordance with the criteria provided in Clause 4.8 of this SEPP, the proposed remediation works fall into Category 2 remediation works and therefore do not technically require consent from Council. Notwithstanding, specific details relating to remediation works have been addressed within the RAP at **Appendix C**. All proposed works shall be carried out in accordance with the applicable guidelines, and appropriate notice shall be given, in accordance with this SEPP.

4.7 State Environmental Planning Policy (Transport and Infrastructure) 2021

4.7.1 Clause 2.119 Development with Frontage to Classified Road

The objectives of Clause 2.119 of this SEPP are:

- (a) to ensure that new development does not compromise the effective and ongoing operation and function of classified roads, and*
- (b) to prevent or reduce the potential impact of traffic noise and vehicle emission on development adjacent to classified roads.*

The proposal will have no impact on the ongoing operation and function of Condamine Street, a state classified road. Existing access points to the site will remain unaltered. Furthermore, the proposal will not increase the generation of traffic, noise, and vehicular emissions incurred onsite.

4.7.2 Clause 2.122 Traffic Generating Development

In accordance with this clause, the continued use of the site for a service station without heavy vehicle refuelling or maintenance services on a classified road requires referral to TfNSW, under Schedule 3, should the proposal constitute an enlargement or extension of the existing premises – being an alteration or addition of the relevant size or capacity.

As detailed in Section 3.0, the proposal does not constitute an enlargement or intensification of the existing use, and therefore, referral to TfNSW is not required.



4.8 Warringah Local Environmental Plan 2011

4.8.1 Land Zoning and Permissibility

Pursuant to the *Warringah Local Environmental Plan 2011* (LEP), applicable to all land within the former Warringah Council LGA (now part of the amalgamated Northern Beaches Council), the site is zoned R3: Medium Density Residential – Refer to **Figure 3**.

Figure 3 Land Zoning Map (Source: NSW Planning Portal Spatial Viewer)



The objectives and land use table of the R3 Medium Density Residential are as follows:

Zone R3 Medium Density Residential

1 Objectives of zone

- *To provide for the housing needs of the community within a medium density residential environment.*
- *To provide a variety of housing types within a medium density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To ensure that medium density residential environments are characterised by landscaped settings that are in harmony with the natural environment of Warringah.*
- *To ensure that medium density residential environments are of a high visual quality in their presentation to public streets and spaces.*

2 Permitted without consent

Home-based child care; Home occupations

3 Permitted with consent



Attached dwellings; Bed and breakfast accommodation; Boarding houses; Boat sheds; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Dual occupancies; Dwelling houses; Educational establishments; Emergency services facilities; Environmental protection works; Exhibition homes; Group homes; Home businesses; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; Recreation areas; Residential flat buildings; Respite day care centres; Roads; Secondary dwellings; Seniors housing; Tank-based aquaculture; Veterinary hospitals

4 Prohibited

Any other development not specified in item 2 or 3

The use of a service station is prohibited in the R3 Medium Density Residential zone, as it is not listed within item 2 or 3 of either land use table. However, the development relies on existing use rights as specified in Section **Error! Reference source not found.** and 4.2.

4.8.2 Relevant Clauses under Warringah LEP 2011

Clause 4.3 Height of Buildings

The site has a maximum prescribed height of building of 11m pursuant to Clause 4.3.

The proposal does not alter the existing building heights or structures onsite, all of which remain below 11m. Similarly, the bin store has a maximum height of 2.7m and complies with the 11m limit.

Clause 4.4 Floor Space Ratio

The site does not have a prescribed floor space ratio limit under Clause 4.4.

Clause 5.10 Heritage Conservation

The site is not classified as a heritage item nor is it located within a heritage conservation area. Provisions within Clause 5.10 therefore do not need further consideration.

Clause 5.21 Flood Planning

As per Council's flood map, the site is not considered to be affected by nor vulnerable to flooding. Nonetheless, the proposed works do not alter the existing ground levels and finished floor levels, and aim enhance the drainage qualities of the site.

Clause 6.1 Acid Sulfate Soils

The site is not located upon any class of acid sulfate soils (ASS). Land located approximately 100m east of the site is identified as Class 5 ASS. As such, the requirement of an Acid Sulfate Management Plan is not necessary and the works are not likely to affect the water table.

Clause 6.2 Earthworks

The objective of this clause is to ensure that earthworks will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.

The proposal necessitates excavation and subsequent filling following the removal and replacement of the UPSS tanks and associated fuel infrastructure. The proposed earthworks will be managed in accordance with the RAP (**Appendix C**) to ensure any adverse effects are mitigated. Otherwise, the earthworks do not alter the ground levels onsite and are therefore considered to not affect any environmental functions and processes.



4.9 Warringah Development Control Plan 2011

The *Warringah Development Control Plan 2011* (DCP) provides further detail to support the Warringah LEP 2011.

The relevant sections of the DCP applicable to the proposed works are:

- Part C – Siting Factors
- Part E – The Natural Environment

The DCP Compliance Assessment at **Appendix B** demonstrates that the proposal is wholly compliant with the applicable provisions of the DCP.

5.0 Assessment of Planning Issues

The following is an assessment of the environmental effects of the proposed development as described in the preceding sections of this report. The assessment considers only those matters under Section 4.15(1) of the EP&A Act that are relevant to the proposal.

5.1 Compliance with Planning Instruments and Controls

The proposed development generally complies with or is consistent with all relevant planning instruments and controls set out in Section 4.0 of this report, in that:

- The works are permissible and compliant under the provisions of the EP&A Act;
- The proposal is generally compliant with the relevant sections of the Warringah LEP 2011 and Warringah DCP 2011; and,
- The proposal is compliant with all other EPIs and standards applicable to the site and proposal.

5.2 Social and Economic Impacts

The proposal will allow the service station to continue delivering social and economic benefits to the local area by ensuring compliance with current standards. As existing and proposed, the operation will generate employment opportunities and provide a convenient, accessible fuel and convenience store to satisfy the demands of local residents, workers, motorists. Economic benefits will result from construction activities with flow on multiplier effects.

5.3 Construction Impacts

5.3.1 Noise

Increased noise levels may result from the use of on-site and off-site mechanical equipment during the course of the works. Noise emissions will be temporary in nature and use of equipment will be managed in accordance with the relevant NSW Construction Noise Guidelines. No changes to operational noise impacts are anticipated.

5.3.2 Odour

When the excavation of potentially contaminated soil is carried out, consideration will be given to prevailing weather conditions. If distinct odours are detected, site works will cease until the odours can be reduced or controlled to acceptable levels.



The site supervisor shall monitor all open excavations and remediated soils with a photo ionisation detector to ensure ambient air concentrations are within the acceptable work safe limits. Alternative control measures could be implemented, including the following:

- Workers could be fitted with vapour masks or respirators for continuation of site works in the area;
- Wetting down the excavated soil with the use of water sprays containing odour suppressant; and
- Any contaminated soil loaded onto trucks for off-site disposal to be securely covered.

5.3.3 Dust

During the earthworks, dust will be visually monitored. If excessive dust is being generated, areas of earthworks will be sprayed with water to reduce dust levels. Soil to be stockpiled will be covered or wetted down to minimise dust generation.

During excavation and transport of any soil off-site, truck wheels should be cleaned or driven through a constructed wash bay or similar control (e.g. rumble grid) to prevent potentially contaminated soil from being transported onto surrounding roads.

5.3.4 Landscaping

Any landscaped areas inadvertently affected during site works will be reinstated or repaired upon completion, noting that a small permanent reduction is proposed to enable the installation of the new tank vent pipes. This reduction will not result in any decrease in on-site or offsite amenity values.

5.4 Safety and Security

The proposal will have no impact on the existing safety and security of the Ampol operation. Details associated with safety measures during construction works will be addressed within a CMP to be provided with details for the Construction Certificate.

5.5 Stormwater Management

The proposal involves changes to the site's stormwater management including the installation of an oil/water separator to filter and treat potentially contaminated stormwater, as well as regrading hardstand areas to improve stormwater flows.

Considering the proposal predominantly involves redeveloping existing hardstand areas, no significant changes to the stormwater discharge rate is anticipated. Refer to the Stormwater Management Plan included in the Architectural Plans at **Appendix A**.

5.6 Waste Management

The proposal includes the construction of a new enclosed bin storage area on a new concrete slab. The proposal is not considered to alter the waste generation rate of the operation as existing. Nonetheless, refer to the Waste Management Plan at **Appendix E** which addresses demolition, construction, and operational waste protocol.

5.7 Public Interest

The proposal is considered to be in the public interest as it relates to necessary maintenance and upgrade of the existing service station infrastructure consistent with current legislative standards and environmental protection outcomes, which ultimately intend to improve the standard of service stations across NSW and Australia.



6.0 Conclusion

This application seeks to undertake UPSS tank replacement and upgrade works at the service station site as detailed in Section 3.0. The proposal is consistent with all requirements and controls contained within relevant legislation and guidelines for service stations.

The proposal does not seek to intensify the existing use but rather improve environmental mitigation and customer safety and utilisation of the site. Upon completion of the works, there will be minimal operational or aesthetic changes to the service station apart from the upgrade to the fuel infrastructure to meet current standards and establishment of the new bin store.

This SEE has assessed the potential impacts arising from the proposal including access, noise, odour, dust, visual amenity, water management and contamination. Where necessary, mitigation measures are proposed to minimise impact and reduce potential risk associated with the upgrade works.

Given the merit of the design of the proposal, significant environmental gain through remediation works and the absence of any significant adverse environmental impacts, the DA is considered to be in the public's interest and worthy of Council's support.

Regards,

SLR Consulting Australia



Kaveen Wickremaratchy
Project Consultant – Planning
kwickremaratchy@slrconsulting.com



Appendix A

Architectural Plans



Appendix B

DCP Compliance Assessment



Appendix C

Remediation Action Plan



Appendix D

Preliminary Risk Screening Report



Appendix E

Waste Management Plan



Appendix F

Environmental Site and Geotechnical Assessment



Appendix G

Site Survey

