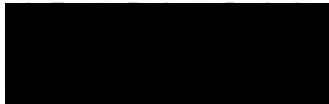


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AGS Environmental Services Pty Ltd  
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**Date: 11 August 2023**

TRUSTEE FOR 409 CLAYTON GROUP TRUST



To Whom it may Concern,

**Subject: Town Planning Letter, former Caltex Service Station, 409 Clayton Road, Clayton****Purpose of This Letter**

AGS has been requested by Tango Projects on behalf of Trustee for 409 Clayton group Trust (The Client) to provide a letter that outlines site remediation and assessment works undertaken at the site and additional works that may be required to support the completion of a statutory audit being undertaken at 409 Clayton Road, Clayton (the site) by Bryden Tiddy of Tetra Tech Coffey.

This letter is based on AGS current understanding of the site based on historical assessments undertaken to complete the previous audit of the site (for ongoing commercial / industrial land use completed by Bryden Tiddy of Tetra Tech on 15 September 2021) and more recent assessment of soil, soil gas and groundwater undertaken by AGS to support the current audit (for residential land use).

**Current Site Condition**

The site is currently vacant with no above ground structures present. In addition, all sub surface infrastructure including 12 x product storage tanks (5 were operational with 7 decommissioned), product delivery lines and interceptor traps have been removed and validated. During removal of subsurface infrastructure impacted soils were removed so far as is reasonably practicable with no residual hydrocarbon impacts reported in the validation data set.

All excavations resulting from removal of subsurface infrastructure were backfilled with certified clean Fill Material. All soils on-site, based on the data set that represents soils remaining after excavation and remediation works, are below the adopted criteria for residential land use.

Recent groundwater assessment works included the installation of 3 additional groundwater wells to replace damaged wells and to ensure site coverage was appropriate. Two rounds of groundwater monitoring have been conducted by AGS on 28 July 2022 and 14 March 2023. Some residual hydrocarbon contamination was reported at 2 of the well locations, however active remediation is not considered practicable and will not achieve any appreciable environmental benefit when weighed against practicalities. Contamination is still not considered to be leaving site, and no LNAPL has been identified during all groundwater assessment works. There is currently a Groundwater Quality Restricted Use Zone in place for the site based on the completed audit for ongoing commercial / industrial land use, the extents of which are currently considered to be appropriate for the current audit.

Recent soil gas assessment works from 2 sample locations reported elevated chloroform above criteria. This is unlikely to result in unacceptable risk however the auditor agrees that a further round of soil gas is warranted.

Soil samples collected by AGS during the installation of both the 3 additional groundwater wells and the 2 soil vapour bores did not report any human health (high density residential) or ecological criteria exceedances.

**Likely Additional Works Required to Satisfy Audit**

AGS considers that the site is well characterised, and the majority of assessment works have been completed. Further assessment of soil gas and groundwater by way of an additional monitoring round of each is likely to be the final field works required assuming that results do not show anything anomalous or unexpected. A site-specific risk assessment may be required following results of the next soil gas round to determine if the soil gas concentrations represent an unacceptable vapour intrusion risk to the basement thereby necessitating engineered controls such as a vapour barrier.

Town Planning Letter, 409 Clayton Rd, Clayton

Remediation of groundwater based on results to date is not considered to be warranted and soil remediation is also considered to be completed. All soils down to a depth of approximately 3m below the existing ground level will be excavated and removed from site to allow for construction of the single level basement.

### Estimated Timeframes for Audit Completion

AGS has to make assumptions about results and review turnaround times in order to provide an estimate on timing for completion of the audit. Given the current knowledge of the site and current review turnaround times and assuming only 1 further round of groundwater and soil gas is required (and no risk assessment), completion of the audit by December 2023 should be achievable.

### Closure

We trust the above satisfies your requirements. Should you have any questions please contact the undersigned.

Regards,

  
Senior Environmental Scientist  
AGS Environmental Services Pty Ltd  


### Limitations

This report shall only be presented and read in full and no excerpts are to be taken as representative of the findings. This Town Planning Letter report for 409 Clayton Road, Clayton, has been prepared by AGS Environmental Services Pty Ltd (AGS) in response to the requirements from Trustee for 409 Clayton Group Trust (client). This document was prepared for the sole use of the client and/or their appointed agents, financiers, the appointed environmental auditor, and/or the regulatory agencies and contractors that are directly involved in this project, the only intended beneficiaries of our work. Any advice, opinions or recommendations contained in this document should be read and relied upon only in the context of the document as a whole and are considered current to the date of this document. Any other party should satisfy themselves that the scope of work conducted and reported herein meets their specific needs before relying on this document. AGS cannot be held liable for third party reliance on this document, as AGS is not aware of the specific needs of the third party.

From a technical perspective, the subsurface environment at any site may present substantial uncertainty. AGS cannot be held liable for variations encountered in the scale of future assessment and / or remedial works recommended as the subsurface is a heterogeneous, complex environment, in which small subsurface features or changes in geologic conditions can have substantial impacts on water and chemical movement. Uncertainties may also affect source characterisation assessment of chemical fate and transport in the environment, assessment of exposure risks and health effects, and remedial action performance if so undertaken. Except as specifically stated above, AGS makes no warranty, statement or representation of any kind concerning the suitability of the site for any purpose or the permissibility of any use, development or re-development of the site.

Use, development or re-development of the site for any purpose may require planning and other approvals and, in some cases, environmental regulatory authority and accredited site auditor approvals. AGS offers no opinion as to whether the current use has any or all approvals required, is operating in accordance with any approvals, the likelihood of obtaining any approvals for development or redevelopment of the site, or the conditions and obligations which such approvals may impose, which may include the requirement for additional environmental works. The ongoing use of the site and/or the use of the site for any different purpose may require the owner/user to manage and/or remediate site conditions, such as contamination and other conditions, including but not limited to conditions referred to in this Report.

AGS acknowledges that information has been provided by other parties during the works undertaken herein. AGS cannot guarantee the accuracy or completeness of this information, however no indications were found during this investigation that the information provided to AGS, was false. The client therefore waives any claim against AGS for any loss, claim or liability arising from inaccuracies or omissions in information provided by third parties. AGS's professional opinions are based upon its professional judgement, experience, and training. These opinions are also based upon review of third party data as described in this document. It is possible that additional testing and analysis might produce different results and/or different opinions. AGS has limited its investigation to the scope agreed upon with its client. AGS believes that its opinions are reasonably supported by the testing and analysis that have been done, and that those opinions have been developed according to the professional standard of care for the environmental consulting profession in this area at this time. That standard of care may change and new methods and practices of exploration, testing, analysis and remediation may develop in the future, which might produce different results. AGS's professional opinions contained in this document are subject to modification if additional information is obtained, through further investigation, observations, or validation testing and analysis during future assessment or remedial activities.