



Mr Daniel Pszczonka  
Director  
Rise Projects Pty Ltd  
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Attn: Liam Porritt, Senior Development Manager, [liam@riseprojects.com.au](mailto:liam@riseprojects.com.au)

Dear Mr Pszczonka

### **Detailed Site Investigation - Phillip Drive, South West Rocks NSW 2431 (Lot 2 DP 1091323)**

The NSW Environment Protection Authority (EPA) is aware that per- and poly-fluoroalkyl substances (PFAS) have been detected in groundwater beneath the former Caltex Terminal on Phillip Drive, South West Rocks, NSW 2431.

The EPA understands that Rise Projects Pty Ltd (Rise Projects) intends to develop Lot 2 DP 1091323 at Lot 2 Phillip Drive, South West Rocks, NSW 2431 ("the Site") for residential purposes. The Site is considered to be located down hydraulic gradient to the former Caltex Terminal.

On 12 October 2022, Rise Projects provided the EPA with a copy of the '*Detailed Site Investigation – Phillip Drive, South West Rocks, NSW, 2431*' Report prepared by Geosyntec Consultants Pty Ltd (Geosyntec) and dated 12 October 2022 (here referred to as "the Report"). Thank you for providing us with the Report.

Geosyntec completed the Report for the purpose of assessing the suitability of the Site for its proposed development, and for addressing contamination-related items as listed in Contention 4 (Contamination) from the Statement of Facts and Contentions filed with The Land and Environment Court by Kempsey Shire Council on 29 August 2022. The Report also included sampling results collected in August 2022 by ECON Environmental Pty Ltd (ECON).

### **Sampling Results**

Eight boreholes were drilled across the Site to a maximum depth of 5 metres below ground level (m bgl). Soil samples were collected at various depths from all eight boreholes and from 4 additional surface locations. Groundwater samples were also collected from all eight boreholes at depths between 1.2 to 4.3 m bgl.

PFAS concentrations from all soil samples were reported below the laboratory Limit of Reporting (LOR).

PFAS (mainly PFOS) were found in five out of eight groundwater samples (GMW1, GMW2, GMW5, GMW7 and GMW8) exceeding the national ecological water guideline for 99% species protection but below drinking and recreational health-based guidelines as described in the PFAS National Environment Management Plan (NEMP 2020)<sup>1</sup>.

However, previous investigations conducted by ECON have identified PFAS in groundwater samples that were collected near the southern boundary of the Site. PFAS concentrations in these groundwater samples exceeded the recreational water health-based guideline (P3) or the national ecological water guideline for 95% species protection (P1A and P1B).

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Whilst these results indicate that PFAS is present in groundwater at and near the Site, the detection of PFAS in up hydraulic gradient groundwater wells and the absence of PFAS in on-site soil samples, indicate that PFAS is likely to be originating from a source upgradient of the Site.

### **EPA Comments and Recommendations**

1. PFAS is present in groundwater beneath the Site. As such, if the Site is proposed for a sensitive development (e.g., residential), the EPA recommends the implementation of appropriate management measures during construction activities to minimise contact and exposure (for both human and environmental health), and/or to prevent mobilisation of PFAS impacted groundwater.

Please note that ultimately, development consent conditions or additional actions might be required under the development application process.

Thank you for your co-operation and assistance with this matter. It helps the EPA to understand the extent of PFAS impact in the area, enabling mitigation measures to be put in place and provide advice to the community, where necessary.

If you have any further questions about this issue, please contact Brendan Pearson on 02 9995 6535 or at [brendan.pearson@epa.nsw.gov.au](mailto:brendan.pearson@epa.nsw.gov.au).

Yours sincerely



2/11/2022

**MARIA MORENO**  
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