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10 October 2022

Mr John Sabbouh  
Richard Crookes Constructions  
Level 3, 4 Broadcast Way  
Artarmon NSW 2064

**RE: IN-SITU ABANDONMENT OF UNDERGROUND PETROLEUM STORAGE TANK AT THE REAR OF THE MONASTERY BUILDING AT ST JOHN OF GOD RICHMOND HOSPITAL, 177 GROSE VALE ROAD, NORTH RICHMOND NSW**

Dear Sir,

We refer to our recent site inspection and discussion in regard to the in-situ abandonment of the underground petroleum storage tank that has been found in the rear area of the former monastery building following demolition of that building within the Richard Crookes Constructions site area at the St John of God Richmond Hospital at 177 Grose Vale Road, North Richmond NSW (the site).

Following demolition of the former monastery building, a small buried storage tank was found in the rear area of the building with an attached filler pipe extending along the eastern side of the former building to the front area near the road. At the end of the filler pipe is a cap fixed with a padlock.

To enable construction work to be carried out in this area of the site, the tank needs to be either abandoned in-situ or removed and disposed of. Each scenario requires that the soil in the area of the tank and filler pipe be validated to confirm that there is no contamination from the product that was stored in the tank.

The in-situ abandonment of the redundant tank is to be carried out in accordance with the requirements detailed in section 6 of the NSW Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019.

This section of the regulation requires that the following actions / activities are carried out for the in-situ abandonment of the redundant tank:

*If a tank or UPSS has been abandoned, a duly qualified person must be engaged to:*

- *remove all flammable and/or combustible liquid and dispose of it appropriately, and*
- *remove any residual flammable vapour for safe disposal, and*
- *remove the tank/s and associated pipework.*

If it is not reasonably practicable to remove the tank or UPSS, ensure that it is made safe by filling the tank with an inert solid material.



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Examples of when it may not be reasonably practicable to remove a tank include where the removal would present an unacceptable risk of damage to:

- a supporting foundation of an existing building or structure.
- an in-service tank or UPSS.
- sub-surface pipework, services infrastructure or assets which are unrelated to the UPSS.
- a sensitive receiving environment.

In these circumstances, it is recommended that a duly qualified person (i.e. a structural or electrical engineer) confirms that it is impractical to remove the tank(s).

#### **Prior to In-Situ Decommissioning the Abandoned Tank**

Clause 23 of the Regulation requires the person responsible for the storage system to advise the relevant local council at least 30 days prior to the proposed decommissioning of the tank or storage system. For urgent or unforeseen situations, the notification must be made as soon as possible.

Consult with the local council for any requirements and/or approvals necessary for the proposed tank removal and/or remediation works.

Then, no later than 60 days following the decommissioning of a tank or UPSS, a report must be provided to the relevant local council. If remediation of the site is required, the report is required no later than 60 days after the remediation has been completed.

The attached checklist (copied from the NSW EPA guideline for implementing the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019) summarises the steps that are required to be taken for the removal of the tank and validation of the surrounding area.

If you require any further information, please contact the undersigned on 0437 251 358.

Yours faithfully

**P. CLIFTON & ASSOCIATES PTY LTD**

*P. Clifton*

Philip Clifton  
Principal  
BOHS IP402 Certified  
SafeWork NSW Licenced Asbestos Assessor  
Attachments: NSW EPA Checklist



## NSW EPA CHECKLIST

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## Appendix 6: Checklist for reporting following the decommissioning, removal or replacement of a UPSS

Where a UPSS has been decommissioned, removed or replaced a report must be provided to the local council.

The report must:

- be prepared by a duly qualified person in accordance with these guidelines
- describe how the storage system was decommissioned
- outline how the storage site was assessed and whether any contamination was identified.

The following checklist is designed to help achieve a uniform approach to reporting on UPSS sites following decommissioning, replacement or removal of a storage system and assist compliance with clause 23 and 24 of the Regulation.

The reporting requirements outlined below are consistent with reporting requirements in Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (EPA 2020).

Each section in the checklist can be considered for a UPSS site where a storage system has been decommissioned, replaced or removed. However, not all the items relating to each subject (as provided in the checklist) will be relevant to each site.

**Table 7 Sample checklist for a report for the decommissioning, replacement or removal of a storage system**

Report section	Required information	Included
Document control	Date, version number	<input type="checkbox"/>
	Author and reviewer (including qualification and/or certification details), contact details, company name, ABN	<input type="checkbox"/>
	Who commissioned the report	<input type="checkbox"/>
Executive summary	Summary of key findings, observations and sampling results	<input type="checkbox"/>
Introduction	Background	<input type="checkbox"/>
	Purpose of report – i.e. whether it is for the decommissioning, replacement or removal of a storage system	<input type="checkbox"/>
	Objectives of the sampling program	<input type="checkbox"/>
	Scope of work – how the storage system will be decommissioned, replaced or removed	<input type="checkbox"/>
Site information	Name, address, lot & DP number, local government area	<input type="checkbox"/>
	Site owner's trading name, description of owner (company, operator, third party), current site use, reason for removal/decommissioning	<input type="checkbox"/>



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Report section	Required information	Included
Site information (continued)	Details of person responsible for the UPSS (if different to site owner)	<input type="checkbox"/>
	Geographic coordinates	<input type="checkbox"/>
	Locality map	<input type="checkbox"/>
	Current site plan with scale bar, showing the direction of north, local water drainage and other local environmentally significant features	<input type="checkbox"/>
Site history and proposed site use	Summary of site use, zoning, proposed site use, proposed development details (if any)	<input type="checkbox"/>
	Current and historical details of the underground storage tanks located on site	<input type="checkbox"/>
Site condition and surrounding environment	Topography, hydrology, geology, groundwater depth and direction	<input type="checkbox"/>
	Direction of surface drainage	<input type="checkbox"/>
	Distance to surface water features and observations of any local sensitive environment/s	<input type="checkbox"/>
	Groundwater bores located on or near the site	<input type="checkbox"/>
	Summary of adjacent sites' use, zoning, off-site effects, etc.	<input type="checkbox"/>
Existing records	Summary of any previous equipment integrity tests (EITs), groundwater monitoring well six-monthly monitoring results and loss monitoring methods and results. Append if necessary	<input type="checkbox"/>
	Conceptual site model	<input type="checkbox"/>
For further guidance see Table 2(a) of the Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (EPA 2020)	Refer to contaminants of concern – section 6.5.5	<input type="checkbox"/>
	Mechanism for contamination, affected media, receptors and exposure pathways	<input type="checkbox"/>
	Assessment of any identified data gaps	<input type="checkbox"/>
	Sampling analysis and quality plan – methodology and justification Refer to: <ul style="list-style-type: none"> <li>• quality assurance and control – section 6.5.2</li> <li>• soil sampling – section 6.5.3</li> <li>• groundwater assessment – section 6.5.4</li> </ul>	<input type="checkbox"/>



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Report section	Required information	Included
Data quality objectives For further guidance see Table 2(b) of the Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (EPA 2020) if more detail is required.)	Refer to data quality objectives – section 6.5.1	
	Field screening protocols	<input type="checkbox"/>
	Photos, logs, field observations	<input type="checkbox"/>
Validation results and discussion	Summary of results from sampling program, in a table that shows: <ul style="list-style-type: none"> <li>essential details i.e. sample identification numbers, depth, etc</li> <li>sample descriptions of all media (soil, groundwater etc)</li> <li>remediation criteria</li> </ul> highlighting samples that exceed remediation criteria	<input type="checkbox"/>
	Site plans or excavation logs of all sample locations	<input type="checkbox"/>
	Site plan(s) showing extent of soil and/or groundwater contamination	<input type="checkbox"/>
Remediation options (if necessary)  See Table 2(d) of the Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (EPA 2020) if more detail is required)	Summary of options available	<input type="checkbox"/>
	Preferred option and rationale – Remediation Action Plan (RAP)	<input type="checkbox"/>
	Remediation details: <ul style="list-style-type: none"> <li>roles and responsibilities</li> <li>sequence of works</li> <li>work health and safety issues</li> <li>site preparation</li> <li>methodology and timeframes</li> </ul>	
	Waste management – waste classification report in accordance with EPA waste classification guidelines	
	Documentation – including material handling and tracking	
Quality assurance and quality control (QA/QC)	Refer to section 6.5.2	
	Verification of compliance with regulatory requirements	<input type="checkbox"/>
	Identify and discuss any ongoing monitoring (if required)	<input type="checkbox"/>
Conclusions and recommendations	Brief summary of all findings	<input type="checkbox"/>
	Rationale and justification in reaching the conclusions	<input type="checkbox"/>
	Any recommendations based on the conclusions	<input type="checkbox"/>
	A clear statement that the duly qualified person considers the subject site to be suitable for the proposed use or other nominated potential uses	<input type="checkbox"/>
	A statement detailing all limitations and constraints on the use of the site (where applicable)	<input type="checkbox"/>
	Recommendations for further work, if appropriate	<input type="checkbox"/>