

24 April 2023

Project No. PS133182-LTR-003-Rev0

Jessica Scata

Goodman Property Services Pty Ltd
1/467 Plummer Street
Melbourne VIC 3207

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ENVIRONMENTAL STATUS OF CLAYTON BUSINESS PARK, 1508 CENTRE ROAD, CLAYTON

Dear Jessica,

1.0 INTRODUCTION

Goodman Property Services Pty Limited (Goodman) engaged Golder Associates Pty Ltd, a WSP Company (WSP Golder) to undertake detailed site investigation of the Clayton Business Park located at 1508 Centre Road, Clayton (the site). WSP Golder is pleased to present a summary of the environmental status of the site to support the planning requirements for the proposed commercial and industrial redevelopment of the site.

Goodman currently own and manage the 32 hectare site with a variety of tenants including car detailers, warehouse storage and printing works. The site has previously been used by Volkswagen and Nissan as a car manufacturing plant and by Linfox for warehousing.

Goodman is proposing to redevelop the site for commercial and industrial land use consistent with the current land use which is likely to include ancillary open space uses for landscaping and may also include other supporting uses such as childcare.

2.0 ENVIRONMENTAL ASSESSMENT

2.1 Site Assessment to Date

There have been a number of environmental assessments of the site by various consultants since 1993. These include:

- Seven rounds of groundwater assessment and monitoring between 1993 and 1995 by consultants including Peter J Ramsay and Woodward Clyde;
- Fourteen rounds of groundwater assessment and monitoring between 2003 and 2010 undertaken by ERM; and
- Nine rounds of groundwater and soil vapour assessment between 2011 and 2021 by Golder.

A number of soil assessments were undertaken at the site between 1993 and 2011. In 2022 WSP Golder undertook a Detailed Site Investigation (DSI) assessment for the site:

- Golder Associates Pty Ltd (2022), *Detailed Site Investigation, Clayton Business Park*. WSP Golder Reference PS133182-001-Rev0, dated 21 November 2022.

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The DSI included a site history summary, summary of all previous known investigations, additional soil, groundwater and vapour investigation to address previous data gaps and assessment of the site contamination status for the proposed development. A site plan (Figure 1) is attached presenting the site layout and environmental investigation locations undertaken to date on the site.

During 2004, Goodman undertook a voluntary Section 53V (under Environment Protection Act 1970) Environmental Audit in relation to groundwater at the site to assess the risk of any possible harm or detriment to the groundwater caused by industrial processes at the site. The Environmental Audit was completed in 2005 with a recommendation to develop and implement a Groundwater Quality Management Plan (GQMP). The GQMP was developed and monitoring under the plan (or subsequent revisions) has continued from 2006 to date.

A Clean Up Notice for the site (No. 90011472) was issued by EPA (under Environment Protection Act 1970) on 10 August 2020 and requires implementation of the latest version of the GQMP (Golder 2021) including annual groundwater monitoring of a nominated network of groundwater wells with a program review and verification by an Environmental Auditor. As of the date of this letter, WSP Golder is undertaking what is expected to be the final groundwater and vapour monitoring to allow the Environmental Auditor to prepare a groundwater monitoring program cessation report to allow groundwater monitoring at the site to cease and the Clean Up Notice to be revoked during 2023.

The following sections summarises the key findings of the assessments to date.

2.2 Site History

The majority of the site was used for various farming purposes until the late 1940s when the first development of the site for commercial purposes occurred. At this time, Jacques Bros used the site for the manufacturing of rail rolling stock and Martin & King Theubries used the site for car air conditioning. By 1958, Volkswagen Australia and various subsidiaries began to acquire the site. The site then passed to Motor Producers (Nissan) in around 1976. The site was then transferred to Clayton Business Park in 1995.

A summary of the chemicals of interest and area of interest are provided in Golder (2022). During previous investigations a number of underground storage tanks (USTs) have been located at the site. These USTs were labelled N1 through N9 as well as an additional set of tanks referenced as the Coca-Cola Canopy tanks. The locations of these tanks are shown in Figure 2.

2.3 Environmental Condition

The environmental condition of the site is described below with respect to contamination observed within soil, groundwater and soil vapour.

- **Soil:** soil contamination has been investigated via over 170 soil investigations across the site (Figure 1). Soil contamination identified to date is generally limited to areas associated with known uses of petroleum and chlorinated hydrocarbon chemicals (Figure 2). These areas will require remediation and validation as part of redevelopment. No other significant areas of contamination posing an unacceptable risk to human health or environment have been identified that require remediation for the proposed use. Given the site history, there is the potential for additional underground infrastructure and utilities that may be identified during redevelopment that may require remediation or management.
- **Groundwater:** Groundwater contamination has previously been identified at the site and has been monitored for almost 20 years including as part of a long period of regulation by EPA. The contamination risk associated with these plumes has been found to be generally low and acceptable for commercial use. It is currently expected that the GQMP monitoring will be closed out in 2023 following some additional

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groundwater monitoring and vapour monitoring and following review by an Auditor of a GQMP cessation report to be prepared.

As part of the close out of the assessment of the broader site in the recent DSI, no additional sources of groundwater contamination have been identified with the exception of a likely offsite source of per- and poly- fluoroalkyl substances (PFAS) to the north of the site and a potential onsite source of PFAS in the vicinity on the eastern boundary and in the south central part of the site. These potential sources require close out through an additional round of groundwater monitoring and potentially some additional groundwater well installation.

- **Soil vapour:** the chemicals in groundwater in some areas of the site are volatile in nature and represent a potential vapour intrusion risk where they are present. Risk assessments undertaken at the site have not identified an unacceptable risk to site users. Should additional volatile substances be identified as part of the removal and validation of subsurface in infrastructure (Figure 2), then further assessment will be undertaken to close out this risk.

3.0 CONTAMINATION MANAGEMENT

A preliminary contamination management strategy has been developed for the site that is aimed at further investigating and mitigating the identified contamination risks for the proposed redevelopment of the site for commercial and industrial land uses. The preliminary contamination management strategy is summarised as follows:

- Undertake the vapour and groundwater monitoring actions to prepare a Groundwater Quality Management Plan (GQMP) cessation report to close out the groundwater monitoring undertaken at the site under the GQMP (Golder 2021).
- Additional monitoring of the recently installed broader network of groundwater wells through one further additional round of groundwater monitoring particularly in the west of the site to confirm groundwater conditions. Further consideration of additional wells to potentially identify sources of PFAS contamination in groundwater on site;
- Undertake the site demolition, remediation and site redevelopment works under a Construction Environment Management Plan that has procedures to identify, manage, remediate and validate contamination issues as they arise.
- At this stage it would be expected that demolition and remediation would comprise:
 - Removal of hazardous materials, demolition of structures, slabs and footings as required to support development.
 - Identification, removal and validation of all identified tanks and pits including those identified in Figure 2 and underground utilities constructed of asbestos containing materials (ACM) where identified.
 - Remediation of currently unidentified contamination associated with infrastructure validation or other currently identified contamination identified during demolition or development through observation or testing including ACM should it be identified;
- Undertake validation reporting of the above works as required to support the redevelopment and confirm any residual contamination impacts on the potential redevelopment (if any) such as the need for ongoing contamination management of soil or vapour impacts.

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4.0 SITE CONTAMINATION STATUS SUMMARY

The site currently poses a low risk to human health and the environment under a commercial and industrial use but some historic infrastructure has been identified that should be removed and remediated as part of any proposed redevelopment. Following implementation of the contamination management strategy that has been developed for the site, WSP Golder is of the opinion that the site will have a contamination status suitable for the land uses associated with the proposed commercial and industrial redevelopment including ancillary uses such as open space and childcare.

5.0 CLOSURE

Your attention is drawn to the document titled - "Important Information Relating to this Report", which is attached to this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

We trust this information meets your requirements. Please contact the undersigned should you have any questions.

Yours sincerely,

Golder Associates Pty Ltd



Ian Kluckow
Technical Director, Contaminated Land

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DE/IMK

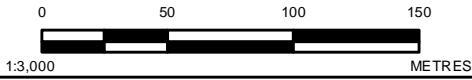
Attachments: Figure 1 – Investigation Locations
Figure 2 - Key Areas of Interest
Important Information

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- LEGEND**
- ◆ Borehole
 - ◆ Groundwater Well
 - Soil Sample
 - Soil Vapour Pin
 - Test Pit
 - Site Boundary
 - Leased/not accessible
 - Not subject to redevelopment

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CLIENT	GOODMAN PTY LTD
CONSULTANT	wsp GOLDER
YYYY-MM-DD	03 NOV 2022
DESIGNED	--
PREPARED	SDH
REVIEWED	LHM
APPROVED	IMK

NOTE(S)

1. PROJECTION: GDA 1994 MGA ZONE 55
2. NOT ALL LOCATIONS HAVE BEEN SURVEYED AND THE SPATIAL ACCURACY OF SOME LOCATIONS IS APPROXIMATE ONLY.

REFERENCE(S)

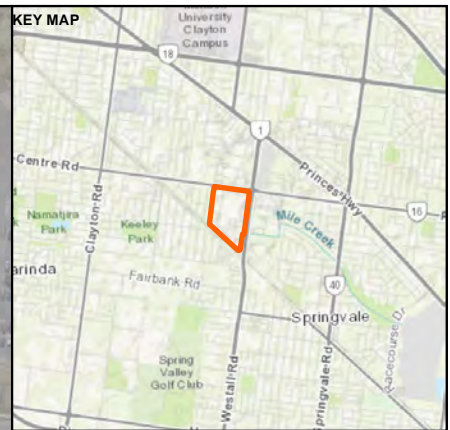
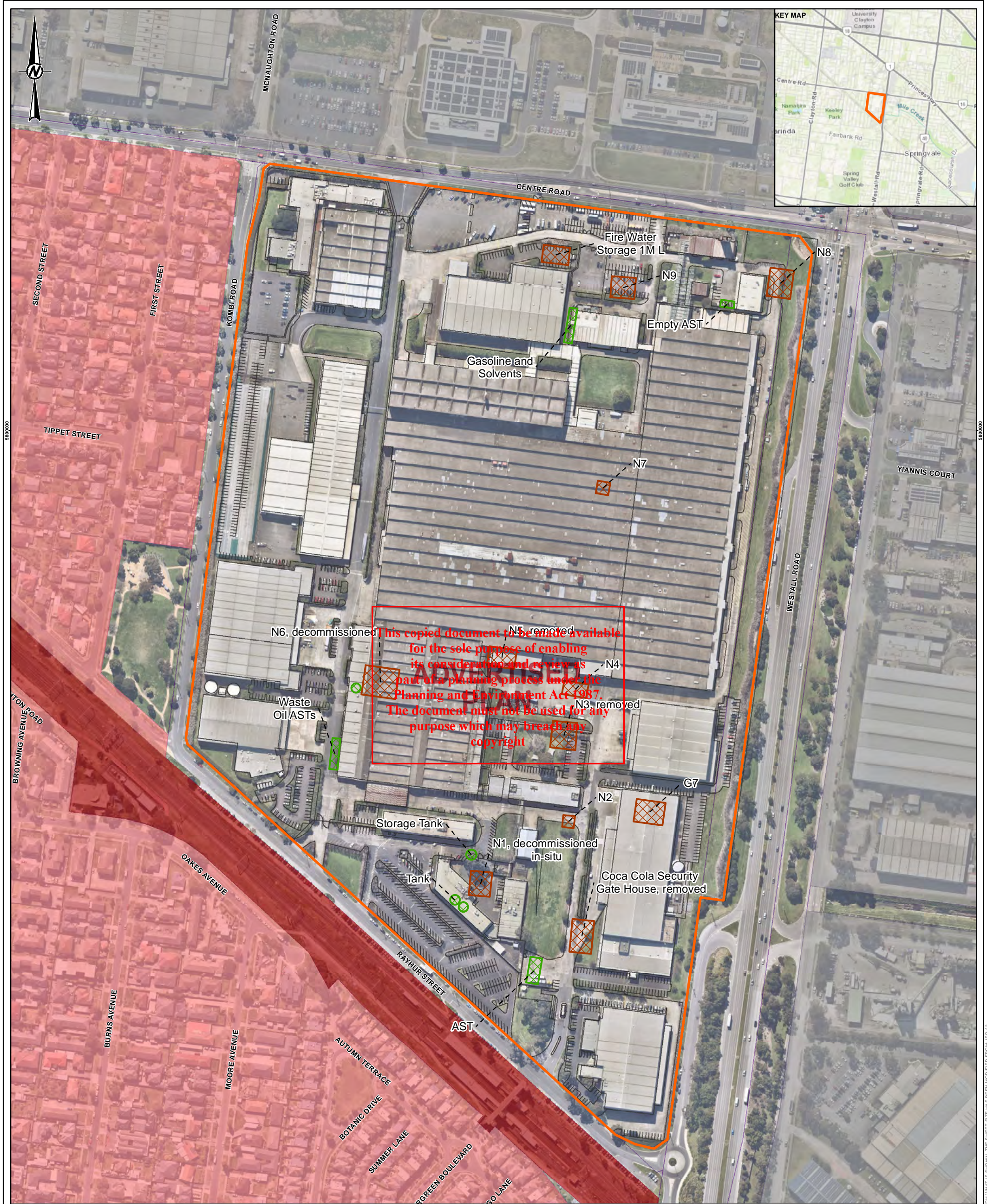
1. AERIAL IMAGERY SOURCED FROM NEARMAP, DATED: 14 SEP 2022.
2. CONTAINS VICMAP INFORMATION (C) THE STATE OF VICTORIA, DEPARTMENT OF SUSTAINABILITY & ENVIRONMENT, 2004. REPRODUCED WITH PERMISSION OF THE DEPARTMENT OF SUSTAINABILITY AND ENVIRONMENT.

PROJECT
 DETAILED SITE INVESTIGATION
 CLAYTON BUSINESS PARK

TITLE
 INVESTIGATION LOCATIONS

PROJECT NO.	CONTROL	REV.	FIGURE
PS133182	001-R	0	1

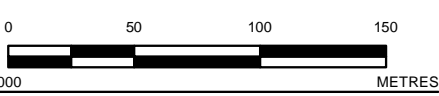
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LEGEND

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Investigation Locations</p> <ul style="list-style-type: none"> Borehole Monitoring Well Soil Sample Soil Vapour Pin Test Pit Current Site Layout Site Boundary | <p>Land Use</p> <ul style="list-style-type: none"> Residential Commercial and Industrial Railway Cadastre AST Location (Approximate) UST Location (Approximate) |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|



CLIENT	GOODMAN PTY LTD	
CONSULTANT	wsp GOLDER	
DESIGNED	YYYY-MM-DD	07 NOV 2022
PREPARED		SDH
REVIEWED		LHM
APPROVED		IMK

NOTE(S)
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PROJECT
 DETAILED SITE INVESTIGATION
 CLAYTON BUSINESS PARK

TITLE
 KEY AREAS OF INTEREST

PROJECT NO.	CONTROL	REV.	FIGURE
PS133182	001-R	0	2

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19 January 2024

Project No. PS133182-LTR-009-Rev1

Jessica Scata

Goodman Property Services Pty Ltd
1/467 Plummer Street
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RESPONSE TO COMMENTS FROM CITY OF KINGSTON AND EPA (DECEMBER 2023), ENVIRONMENTAL STATUS OF CLAYTON BUSINESS PARK, 1508 CENTRE ROAD, CLAYTON

Dear Jessica,

EXECUTIVE SUMMARY

- Goodman has proposed a redevelopment of Clayton Business Park at 1508 Centre Road that is industrial/commercial use only and no other sensitive uses permitted under the planning scheme (such as childcare);
- WSP Golder has been engaged by Goodman undertaking environmental services on Clayton Business Park for 13 years since 2011.
- The WSP Golder scope has included working with the EPA and Environmental Auditors in response to Notices issued by the EPA. There are no current EPA regulatory Notices in force on the site.
- Goodman is currently awaiting completion of the Environmental Auditor review of recent groundwater and vapour monitoring which will close out the groundwater monitoring regulatory process confirming the identified risks associated with groundwater are acceptable for the ongoing commercial/industrial use of the site.
- WSP Golder investigations of the broader site (most recently a Detailed Site Investigation completed in November 2022) has not identified specific areas of soil, groundwater or vapour contamination requiring remediation for the proposed use.
- As is typical for the redevelopment of former industrial sites such as a car assembly plant, there are several likely underground pits and tanks identified and other underground utilities that should be removed as part of the demolition and redevelopment process with these areas validated at the time at the time of removal. A plan for the removal and close out of historical infrastructure has been outlined.
- Under Planning Practice Note PPN30 (DELWP 2021), WSP Golder do not consider that an Environmental Audit is required as part of the assessment process to support redevelopment because no sensitive uses are proposed and due to the low contamination risk identified and the long history of assessment and close out of site regulation by the EPA to confirm the low risk. Instead, a staged documentation and close out of historic infrastructure removal and validation is proposed to manage remaining risks should they be identified during development.

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1.0 INTRODUCTION

Goodman Property Services Pty Limited (Goodman) engaged Golder Associates Pty Ltd, a WSP Company (WSP Golder) to undertake detailed site investigation of the Clayton Business Park located at 1508 Centre Road, Clayton (the site). WSP Golder was then requested to prepare a summary of the environmental status of the site to support the planning requirements for the proposed commercial and industrial redevelopment of the site. The summary was provided in:

- Golder Associates Pty Ltd (2023), Environmental Status of Clayton Business Park, 1508 Centre Road, Clayton, WSP Golder Reference PS133182-003-Rev0, dated 24 April 2023.

Comments on the summary document have now been received by WSP Golder (Via DTP and then Goodman) from both City of Kingston and EPA. The comments received from the two parties were dated 8 December 2023 and 12 December 2023 respectively.

This letter sets out our response to the comments received.

2.0 RESPONSE TO COMMENTS

We understand the key comments provided are as outlined below along with our responses to these comments.

2.1 EPA Comments

EPA in its email dated 12 December 2023 has summarised the information provided by WSP Golder and provides the following closing comment:

“EPA has not undertaken a technical review of the DSI carried out by Golder (2022). However, it noted that the DSI stated that an Environmental Audit is not warranted subject to additional actions recommended in the DSI (see proposals above). EPA advises that the responsible authority (RA) must ensure that the land is suitable for the intended future use and an independent review of the information/report(s) and determine whether the assessments are adequate should be undertaken. If the RA is unsure of the quality of the information/report(s) or its recommendations, EPA recommends that the RA consider engaging a suitably qualified person to provide an independent peer review.”

We note that EPA **has not requested any further information nor made any recommendations unless “the RA is unsure of the quality of the information/report(s) or its recommendations”.**

2.2 City of Kingston Comments

City of Kingston (Council) in its email dated 8 December 2023 has provided the following key comments regarding the WSP Golder information presented and its additional assessment of matters related to contamination:

- Council has commented that the April 2023 WSP Golder summary letter “...only presents a summary overview of the environmental status of the Clayton Business Park site. There is no detail on the current nature and distribution of contamination across the site. It is inferred from the letter that contamination of soil and groundwater is widespread and present across the site.”
- Council has reviewed the voluntary Section 53V (under EP ACT 1970) Environmental Audit and raised some questions regarding the outcomes and processes associated with the recommendations of the Audit and whether the requirements have been closed out.

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- Council has concluded that:

“Noting the scale and significance of the proposed redevelopment of the site, and the nature and extent of contamination detected at the site, Council considers that an Environmental Audit (under the Environment Protection Act 2017) of the contamination management strategy, including remediation implementation and validation findings, would be warranted to provide assurance to the Authority of the suitability of the site for the proposed and anticipated site development, including sensitive use, at the completion of the strategy. Council has had some experience with the introduction of sensitive uses to larger scale business parks and the need to consider this issue at the early planning stages is beneficial.”

Given the above comments, to provide further clarity to Council, WSP Golder has provided further details on the two key environmental assessment processes on site that are being undertaken to close out regulatory and planning requirements and support the redevelopment. These processes are:

- 1) The groundwater contamination management and associated regulatory process that has been running since the Section 53V Environmental Audit undertaken in 2005;
- 2) The management of site contamination as part of Goodman’s Duty to Manage and to support the planning and redevelopment process for the site from its current industrial/commercial use to a new industrial/commercial use.

In relation to the second process, we note Council refers to sensitive uses as the WSP Golder summary mentioned ancillary uses to the industrial/commercial uses proposed by Goodman. It is understood that no such sensitive uses are considered and that the development is an industrial/commercial use only and sensitive land uses do not apply.

2.2.1 Groundwater Regulatory Process

The following information outlines the history of the groundwater regulatory process at the site to provide further context regarding Goodman’s management and close out of the groundwater assessment process.

In 2005, the site was subject to a Section 53V Environmental Audit (SKM 2005) following a recommendation from the EPA Victoria that an environmental audit be undertaken at the site in relation to the risk of possible harm or detriment to groundwater caused by industrial practices.

The audit recommended development and implementation of a Groundwater Management Plan (GMP) subsequently prepared by ERM (2006). ERM implemented the GMP between 2006 and 2010. The Auditor reviewed the results of these monitoring events and concluded that groundwater monitoring should continue.

In 2011 and to satisfy the recommendations of the 53V audit (SKM 2005), Golder was engaged by Goodman to review the GMP and prepared a revised Soil Vapour and Groundwater Management Plan (SGMP) (Golder, 2012) based on a revised Hydrogeological Site Conceptual Model (Golder, 2012) for the site. This revised SGMP replaced the ERM (2006) GMP. Four rounds of groundwater monitoring and soil vapour sampling were undertaken. The Auditor reviewed the results of these monitoring events and recommended that monitoring program ceases (Jacobs, 2015). EPA agreed to the cessation of groundwater monitoring and the close out of the Section 53V audit recommendations (SKM 2005) on 30 November 2017.

On 31 October 2017, EPA issued a Clean Up Notice (No. 90008000) requiring among other things, further assessment of groundwater impacts in the north of the site and development of a GQMP. Golder prepared a detailed site investigation of the northern area of the site and developed a GQMP dated 12 July 2018 which resulted in revocation of the Notice by EPA on 16 August 2018.

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EPA issued a further Clean Up Notice (No. 90009073) on 18 August 2018 requiring implementation of the GQMP (Golder 2018). The GQMP was implemented with subsequent auditor review and verification in 2020. The EPA Notice was revoked on 7 August 2020.

The most recent Clean Up Notice for the site (No. 90011472) was issued on 10 August 2020 and required implementation of the latest version of the GQMP (Golder 2021) including annual groundwater monitoring of a nominated network of groundwater wells with a program review and verification by an Environmental Auditor. The monitoring works were undertaken in 2021 and 2022. The Auditor for the site, Mr Phil Bayne of SLR Consulting undertook a review of the monitoring program on 18 July 2022. To close out the monitoring program, the Auditor review recommended some additional monitoring actions and preparation of a groundwater monitoring cessation report.

These works were completed by WSP Golder in 2023 and the groundwater monitoring cessation report submitted to the Environmental Auditor in September 2023 in the document entitled:

- Golder Associates Pty Ltd (2023), Supporting Information for Cessation of Groundwater Quality Monitoring Plan, 1486-1550 Centre Road, Clayton South. WSP Golder Reference PS133182-004-Rev1, dated 19 September 2023.

Goodman is currently awaiting the completion of the Environmental Auditor review with an expectation of verification of the monitoring close out report prior to submission to EPA in early 2024. This will close out the groundwater monitoring regulatory process on site confirming the identified risks associated with the groundwater are low and acceptable for the industrial/commercial use. Furthermore, with the expiration of the most recent Clean Up Notice for the site (No. 90011472), **no EPA regulatory notices are currently in place** on the site.

2.2.2 Environmental Assessment to Support Redevelopment

There have been a significant number of site assessments undertaken at the site from 1993. As indicated in the site summary submitted in April 2023, WSP Golder undertook a Detailed Site Investigation (DSI) assessment to support the industrial/commercial development of the site:

- Golder Associates Pty Ltd (2022), Detailed Site Investigation, Clayton Business Park. WSP Golder Reference PS133182-001-Rev0, dated 21 November 2022.

The information regarding the site contamination condition as set out in our summary letter (April 2023) has not been repeated in this letter. However, in summary, the assessment:

- 1) **Has not identified** specific areas of soil, groundwater or vapour contamination requiring remediation for the proposed use;
- 2) **Has identified** known and potential former underground infrastructure including tanks, pits and underground utilities that should be removed as part of the demolition and redevelopment and the remaining contamination status in these areas validated as part of the demolition process;

The proposed process to close out the environmental assessment at the site to support the redevelopment was set out in Section 3 of our summary letter dated April 2023 as follows:

- Additional monitoring of the recently installed broader network of groundwater wells through one further additional round of groundwater monitoring particularly in the west of the site to confirm groundwater conditions (currently being undertaken);

- Demolition and remediation (as required) as part of the staged redevelopment as follows:
 - Undertake the site demolition, remediation and site redevelopment works under a Construction Environment Management Plan that has procedures to identify, manage, remediate and validate contamination issues as they arise.
 - Removal of hazardous materials, demolition of structures, slabs and footings as required to support development.
 - Identification, removal and validation of all identified tanks and pits and underground utilities constructed of asbestos containing materials (ACM) where identified.
 - Remediation of currently unidentified contamination associated with infrastructure validation or other currently identified contamination identified during demolition or development through observation or testing including ACM should it be identified;
- Validation reporting of the above works as required to support the redevelopment and confirm any residual contamination impacts on the potential redevelopment (if any) such as the need for ongoing contamination management.

WSP Golder confirm that the site currently poses a **low risk** to human health and the environment under a commercial and industrial use but some historic infrastructure has been identified that should be removed and remediated as part of any proposed redevelopment for commercial/industrial use.

Under Planning Practice Note PPN30 (DELWP 2021), WSP Golder do not consider that an Environmental Audit is required as part of the assessment process to support redevelopment because no sensitive uses are proposed and due to the low contamination risk identified and the long history of assessment and close out of site regulation by the EPA to confirm the low risk. The remaining contamination risk and the above actions can be undertaken effectively under Goodman's Duty to Manage contamination under the Environment Protection Act 2017 with reporting to the Responsible Planning Authority of the recommended actions as part of the preparation for each stage of development.

Following implementation of the contamination management strategy that has been developed for the site, the site will have a documented contamination status suitable for the land uses associated with the proposed commercial and industrial redevelopment.

3.0 CLOSURE

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We trust this information meets your requirements. Please contact the undersigned should you have any questions.

Yours sincerely,

Golder Associates Pty Ltd



Ian Kluckow
Technical Director, Contaminated Land Management

DE/IMK

Attachments: Important Information

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At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation. Golder has been engaged to undertake Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder's affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification

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