
REMEDIATION ACTION PLAN

97-123 WALLGROVE ROAD, CECIL PARK NSW

CECIL PARK BUSINESS HUB DEVELOPMENT

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Document Information

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ATTACHMENTS

Figure 1 Site Layout and Location Plan
Figure 2 Remediation Area Plan

LIMITATIONS

The reader is referred to the limitations presented in section 7 of this report.

1. INTRODUCTION

1.1 Background information

Fyfe Pty Ltd (Fyfe) was commissioned by Western Sydney Parklands Trust (WSPT) to produce a Remediation Action Plan (RAP) pertaining to the proposed development of a Business Hub located at 97-123 & 125-151 Wallgrove Road, Cecil Park, NSW. Although the DSI and PSI included both 97-123 and 125-151 Wallgrove Road, the RAP is only applicable to the southern portion of the land proposed as part of the Business Hub Development at 97-123 Wallgrove Road (the site).

The site is part forested, and part cleared land and has been used for agricultural purposes since at least 1947. A Preliminary Site Investigation (PSI) was conducted in 2024 to facilitate planning approval for the proposed development. The PSI identified potential sources of contamination including a discarded sheet of bonded asbestos containing material and various domestic wastes (oil and chemical containers, scrap metal, tyres etc.) predominantly in the southern area of the site.

A Detailed Site Investigation (DSI) was undertaken by Fyfe in August/September 2024 to confirm the presence and extent of Asbestos Containing Material (ACM) and any additional contamination on the site. Subsequently the DSI identified asbestos sheeting fragments and an asbestos fibre bundle in shallow fill used to construct the unsealed driveway. An extensive site walkover by Fyfe did not identify any discarded asbestos containing material, other than in the unsealed driveway and the single sheet previously identified in the PSI. The PSI and DSI did not identify any other contamination associated with the sites current or historical uses.

The presence of asbestos is likely attributable to the demolition of the buildings / structures located on the site, and the importation of uncontrolled fill for the construction of the unsealed driveway.

This Remediation Action Plan (RAP) is required by local council as part of the planning approval process and provides information on the proposed works to manage and remediate the identified contamination prior to development at the site. The RAP is intended to be used by WSPT to facilitate the remediation of the identified asbestos contamination.

1.2 Objectives

The objectives of the RAP are to:

- Determine the type and extent of the remediation required to ensure the site is suitable for its intended purpose and to support the planning approval required for development.
- Specify the proposed scope of works and remediation validation objectives to remove the contamination identified in the DSI.

The remediation endpoint for the site will only be reached when the identified contamination has been remediated to the extent where the site is suitable for the proposed future business hub development.

1.3 Scope of work

The scope of works to be undertaken as part of the RAP includes the following:

- A brief summary of the history and environmental setting of the site, including previous site investigations;
- Evaluation of available remedial options and a summary of the preferred remedial strategy; and
- A summary of remediation validation objectives to determine, where practical, the remediation objectives have been achieved.

2. SITE DETAILS

2.1 Site Characterisation

A brief site characterisation has been provided for the site below, and for a more comprehensive site characterisation refer to the Fyfe Detailed Site Investigation (DSI) (2024).

2.1.1 Site identification

Property identification details for the site are provided in Table 2.1.

Table 2.1 Property identification details

Address	97-123 Wallgrove Road, Cecil Park, NSW, 2178.
Certificate of title	Lot 25, Section 4, DP 2954
Property description	Lot 25, Section 4, DP 2954 includes native bushland in the west and mostly cleared land to the east with patches of native flora and site infrastructure that includes two sheds; a dam; a horse pen; a demolished poultry pen; an access road; and an unoccupied residential dwelling.
Current site owner	Western Sydney Parklands Trust.
Local council	City of Fairfield
Zoning	Unzoned land.
Former land use	Agrecultural and residential
Current land use	Currently vacant with infrastructure associated with the previous rural residential use.
Proposed land use	Development to host a business hub that will comprise a warehouse and ancillary office that will be accessed by an internal road.
Property area	Approximately 49,000 m ²

2.1.2 Site description

The site is bound to the north by the second parcel of land that will comprise part of the Business Hub Development a portion of which is currently being used by Transport for NSW for the M7-M12 integration project (refer Fyfe 2024 DSI) and west by rural residential and small-scale agricultural properties which included residential infrastructure, greenhouses, and dams. To the south is native vegetation with some cleared agricultural land. Further south and to the east works are being undertaken by Transport for NSW for the M7-M12 integration project. The site comprises 97-123 Wallgrove Road. and includes bushland to the west made up of native vegetation and smaller undergrowth. The eastern portion of the site includes paddocks and some patches of native flora. Site infrastructure includes: two sheds; a dam; a horse pen; a poultry pen; an access road; and an unoccupied residential dwelling.

A plan showing the layout of the site is attached as Figure 1.

2.1.3 Regional conditions

The regional conditions are summarised in Table 2.2.

Table 2.2 Summary of regional conditions

Topography	The site increases in elevation from west to east with the surrounding land increasing in elevation to the south, east and west. The land to the north of the site decreases in elevation towards Ropes Creek. The land beyond Ropes Creek increases in elevation to the north. Geoscience Australia Elvis database (2023) indicates that the site is located at a height ranging from approximately 93 m Australian Height Datum (AHD) in the west to approximately 111 m AHD in the east.
Geology and soils	Information obtained from the Department of Mineral Resources Geological Survey of Penrith (Geological Series Sheet 9030, Scale 1:100,000, Edition 1, 1991), indicates that soils within the site to be underlain by Triassic Age Shale of the Wianamatta Group, comprising shale, carbonaceous claystone, claystone, laminate, fine to medium grained lithic sandstone, rare coal and tuff.
Acid sulfate soils	According to the CSIRO's Australian Soil Resource Information System (ASRIS) website, the area that includes the site has an extremely low probability of containing acid sulfate soils, although this is based on limited (i.e. very low confidence) data. As acid sulfate soils are generally encountered below 5 m AHD (Sullivan et al., 2018), this supports the conclusion that acid sulfate soils are unlikely to be present.
Hydrology	The closest surface water bodies to the site are as follows: – Ropes Creek, located approximately 400 m to the north; – A tributary of Ropes Creek, flowing immediately adjacent (~10m) to the western boundary; – Approximately six farm dams located within 500 m radius of the site; and – An unnamed creek line located approximately 250 m to the southwest. Based on the location of the identified surface water courses and site topography, the inferred groundwater flow direction at the site is considered likely towards the west. – Based on site surface topography, the overall surface water direction on the site is considered likely to be towards the west.
Hydrogeology	An online search of the WaterNSW Real-Time Groundwater Map identified one registered groundwater monitoring well within a 500 m radius of the site. The summary information for the registered monitoring well identifies the standing water level at 34 m BGL. The monitoring well was drilled to a depth of 246 m BGL with the geology encountered including clay (0-3m BGL) followed by shale and sandstone.

2.2 Summary of previous and associated environmental investigations

Table 2.3 provides a summary of the previous and associated environmental investigations undertaken at the site.

Table 2.3 Summary of previous and associated environmental investigations

Construction Sciences (2024) Preliminary Site Investigation	
Scope of work	The scope of work undertaken as part of the PSI included: – A desktop review of the site history; – A walkover of the site; – Collection of a limited number of environmental samples from geotechnical boreholes; and – Data assessment and reporting. It is noted that the PSI report covered an area greater than that subject to this DSI: the north-eastern portion of the PSI site is not within the scope of this DSI.

<i>Conclusions and recommendations</i>	As the PSI addressed a greater area than that of the DSI, some of the conclusions and recommendations in the PSI are not relevant here and so have not been included in the following summary: - There is contamination present at the site arising from past land use activities, specifically the presence of visible fragments of asbestos containing material (ACM) in surface soils near P1-PACM2, P1-PACM3 and P2-PACM1 (refer to Figure 4 and Figure 5 in Appendix B for the approximate locations of these identified ACM hotspots). Recommendations included the following: - The client should barricade off the areas where ACM has been observed at the site and erect appropriate signage to prevent access by the public; and - The client should seek the advice of an appropriately qualified environmental consultant on how best to remediate or implement interim controls to prevent potential asbestos exposure risks. - A stage 2 detailed site investigation (DSI) should be undertaken at the site to further assess potential contamination risks associated with the identified areas of environmental concern; - Any contamination found while undertaking the DSI should be remediated in accordance with a Remedial Action Plan (RAP); and - The stage 2 DSI and the RAP (if required) should be undertaken / prepared by a suitably experienced environmental consultant.
Fyfe (2024) Cecil Park Detailed Site Investigation.	
<i>Scope of work</i>	The scope of work as part of the Fyfe 2024 DSI included the following: - Identify contamination and the extent in soil; - Identify potential risk to groundwater based on soil analytical results; - review the PSI conducted by Construction Sciences (CS), site characterisation and historical information and identify potential data gaps; - identify any associated potential risks to human health and/or the environment; and - provide recommendations for further assessment/management of any identified site contamination.
<i>Conclusions and recommendations</i>	The conclusions made as part of the 2024 Fyfe DSI are as follows: - The site history and limited soil sampling investigation conducted by Construction Sciences identified some wastes present at the site arising from past land use activities, specifically the presence of a sheet of asbestos containing material on the ground and various domestic type wastes (oil and chemical containers, scrap metal, a tyre and an engine) in the south-eastern portion of the site. Fyfe reviewed the PSI report and identified the need for some limited further sampling and analysis of soils near a metal clad shed adjacent to the southern boundary of the site, near the former residence and along the unsealed entrance driveway - Soils were sampled by Fyfe at 14 locations and chemical analyses showed there to be no analyte concentrations that exceeded the adopted human health or ecological criteria for a commercial/industrial use of the site. - ACM including a loose fibre bundle was identified in shallow soils that had been used to construct the unsealed entrance driveway. Fyfe undertook a comprehensive site walkover to determine if there may be more discarded ACM present than that identified in the PSI. The walkover confirmed that the ACM reported in the PSI was still present. It did not identify any other ACM except for that in the entrance driveway. - Laboratory analytical testing showed that concentrations of chemical contaminants in soil were either below the laboratory limits of reporting or below the adopted human health and ecological screening criteria applicable to a commercial or industrial land use. - A preliminary classification of site soils was undertaken by Fyfe to inform the disposal of excess soils that may be generated by the development and require off-site disposal. The majority of the soils at the site have been given a preliminary Virgin Excavated Natural Material classification. - One zinc concentration exceeded the excavated natural material (absolute max) criteria in soil sample BH14_0.1. Therefore, shallow soils in the vicinity of BH14 have been given a preliminary waste classification of General Solid Waste should they require removal from the site. Alternatively, these soils are suitable for reuse elsewhere onsite. - Asbestos present in the fill material used to construct the unsealed driveway is classified as Special Waste and will require disposal to a licenced facility.

	– Based on the depth to groundwater (expected to be approximately 34 m BGL), soil analytical results, site history review and historical surrounding land uses identified, there is no identified risk of harm to water and therefore no groundwater assessment is considered necessary. – Given the routine nature of the asbestos removal works which would be undertaken by a licenced asbestos remediation contractor, and the absence of any other contamination that needs remediation, Fyfe considers that a Remediation Action Plan (RAP) is not required. – Following the removal of the waste ACM and the fill material in the entrance driveway, the site is considered suitable for its proposed commercial / industrial use.
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3. CONCEPTUAL SITE MODEL (CSM)

Schedule B2 of the ASC NEPM (1999) recommends the development and refinement of a conceptual site model (CSM) that identifies the potential sources of contamination, the COPC, the likely media involved and the pathways by which exposure to any contamination at the subject site may occur. For exposure to occur, a complete pathway must exist between the source of contamination and the receptor (i.e. the person or ecosystem components potentially affected). Where the exposure pathway is incomplete, there is no exposure and hence no risk via that pathway.

Contamination at the site has been identified in the form of a discarded piece of ACM sheeting. This sheeting was likely derived from sheeting that had been used elsewhere on the site. ACM contamination was also found in the fill material used to construct the unsealed driveway into the property. A loose fibre bundle was detected in one of the samples from the unsealed driveway.

In addition, there are a range of wastes present that should be removed and disposed of appropriately. These wastes include domestic oil and chemical containers, a car engine, tyres, vehicle batteries, scrap metal and concrete materials.

The ACM sheeting is present in a bonded form within the matrix of the building material and so does not present a risk to human health in its current undisturbed condition, whilst the site remains vacant. However, the presence of a loose fibre bundle indicates that the unsealed driveway fill material may present a potential risk to human health if disturbed. The fibre bundle has almost certainly been generated from the movement of vehicles over the bulk ACM fragments present in the fill material used to construct the driveway.

To avoid risks to human health, the discarded ACM sheeting and the fill material used to construct the entry driveway should be removed by an appropriately licensed asbestos removal contractor before any other works are undertaken.

At the completion of these works the site should not present any unacceptable risks to human health or the environment under a future commercial/industrial use of the site.

4. REMEDIATION OBJECTIVE AND TARGETS

The remediation objectives and targets which have been developed for the site have been summarised in Table 3.1. It has already been determined by the Fyfe DSI (2024) that site contamination is attributed to the ACM in the shallow fill soils that make up the driveway, discarded asbestos sheeting and miscellaneous wastes including chemical containers, an engine, tyre, vehicle batteries, scrap metal and concrete fragments.

This RAP is designed to facilitate the complete remediation of the site by outlining the remediation activities required to ensure all contamination is appropriately managed prior to the commencement of any development works.

Table 4.1 **Summary of remediation objectives and targets**

Remediation objective	Remediation target
Removal of all ACM from the dwelling prior to demolition	Asbestos removal certificate
Remove discarded sheets of ACM from the site.	No ACM sheeting remaining on site.
Removal of shallow driveway fill soils that are contaminated with asbestos.	No ACM remaining in the driveway.
Removal of miscellaneous waste.	Wastes that require disposal including domestic oil and chemical containers, an engine, tyre, vehicle batteries, scrap metal and concrete fragments.

5. REMEDIATION METHODOLOGY

5.1 Guidance

The development of this RAP and the proposed remediation works to be completed as part of the site redevelopment works should be undertaken in reference to the following guideline documents:

- CRC CARE (2019) National Remediation Framework. Version 0.1, June 2019;
- *Contaminated Land Management Act 1997*;
- Environmental Protection Regulations 1987;
- National Environment Protection (Assessment of Site Contamination) Measure 1999 (amended in 2013);
- National Environment Protection Council (New South Wales) Act 1995;
- NSW Contaminated Land Management Act 1997;
- NSW EPA (2020) *Contaminated Land Guidelines*;
- NSW EPA Waste Classification Guidelines Part 1: Classifying Waste, 2014;
- NSW Protection of the Environment Administration Act 1991;
- NSW Protection of the Environment Operations Act 1997;
- NSW Waste Avoidance and Resource Recovery Act 2001;
- NSW Work Health and Safety Act 2011;
- NSW Work Health and Safety Regulation 2017;
- Protection of the Environment Operations (Waste) Regulation 2014;
- SafeWork NSW (2022) How to safely remove asbestos, code of practice;
- SafeWork NSW (2022) How to manage and control asbestos in the workplace, code of practice;
- SafeWork Australia 2024 Workplace Exposure Standards for Airborne Contaminants;
- SEARs (2022) *Streamlined Secretary's Environmental Assessment Requirements*;
- WA DOH (2009) *Guidelines for the assessment, remediation and management of asbestos contaminating sites*;
- and
- Protection of the Environment Operations Act 1997.

5.2 Remediation – ACM in Building

To remove all ACM contamination from the site, the residential dwelling (refer IC2 in Figure 1 attached) will require a pre-demolition audit by a suitably qualified person to identify and confirm the presence of any ACM within existing on-site structures. All bonded asbestos in quantities greater than 10 m² and/or all friable asbestos, will require removal by a licensed asbestos removal contractor in accordance with applicable legislation and codes of practice. The ACM must be transported in accordance with SafeWork NSW code of practice requirements and disposed to a suitably licensed landfill. If the pre-demolition audit recommends air monitoring, it should be undertaken in accordance with *SafeWork Australia 2024 Workplace Exposure Standards for Airborne Contaminants*.

Following removal of all ACM from the buildings, an independent Licensed Asbestos Assessor (LAA) will be required to undertake an inspection of the buildings and a survey of the ground surface in the immediate vicinity of the buildings, prior to issuing an asbestos clearance certificate. Once the clearance certificate has been issued by the LAA, the residential dwelling can be demolished, and the generated waste can be removed from the site and disposed of as Construction and Demolition (C&D) waste.

All assessment, removal of ACM and demolition work will require appropriately qualified contractors specific to the required tasks. All work completed by the appropriately qualified contractors will be completed under the contractor's standard operational procedures and in strict adherence to all relevant legislation.

5.3 Remediation – ACM Sheeting

The identified loose ACM sheeting (refer IC1 in Figure 1 attached) will also require removal by the licensed asbestos removal contractor in accordance with all relevant legislation. A survey of the ground surface in the vicinity of the loose ACM sheeting will be required to ensure no other ACM is present. Once the ACM sheeting has been removed, the licenced asbestos assessor will undertake a clearance inspection and issue an asbestos clearance certificate.

Fyfe recommends that these works be undertaken in conjunction with the removal of the ACM in the buildings (Section 5.2).

5.4 Remediation – ACM in Driveway

The unsealed driveway (refer IC3 in Figure 1 attached) which is made up of shallow fill soils that contain bonded asbestos, and an asbestos fibre bundle (refer Fyfe 2024), will require removal by a Class A licensed asbestos removal contractor in accordance with all relevant legislation.

The asbestos contaminated fill that makes up the unsealed driveway is approximately 0.2 m in depth and extends approximately 100 m from the site boundary in the southeastern corner of the site, to the residential dwelling. All fill soils used to construct the driveway should be excavated in their entirety to the top of the underlying natural soils, then transported and disposed to landfill in accordance with SafeWork NSW code of practice requirements. It is estimated that approximately 90 m³ of asbestos contaminated soil, classified as Special Waste (asbestos waste), will require removal from the site and disposal to a landfill site that can lawfully receive this waste (Fyfe 2024).

Asbestos waste loads weighing more than 100 kg or consisting of more than 10 m² of asbestos sheeting in one load, must be tracked and reported to the EPA by a transporter that is registered with the NSW EPA WasteLocate system. Asbestos contaminated soils must be wetted down during removal and must be transported in covered leak-proof vehicles to the designated landfill. Asbestos waste cannot be reused or recycled and must be disposed to landfill.

Upon the complete removal of shallow fill soils within the unsealed driveway, the licenced asbestos assessor will undertake a clearance inspection and issue an asbestos clearance certificate.

5.5 Remediation – Miscellaneous Waste

Additional miscellaneous wastes identified on-site (refer IC4 in Figure 1 attached) requiring removal as part of the site remediation works. These wastes include domestic oil and chemical containers, a car engine, tyre, vehicle batteries, scrap metal and concrete fragments.

In accordance with the *Waste Avoidance and Resource Recovery Act 2001 and the Protection of the Environment Operations (Waste) Regulation 2014*, each of the miscellaneous wastes identified on-site should be recycled to the appropriate recycling facilities. Where recycling of these miscellaneous waste materials is not possible, they should be disposed as General Solid Waste (non-putrescible) to a suitable landfill facility (refer Fyfe 2024 DSI).

6. REFERENCES

Australian Standard AS4482.2-1999 - *Guide to the sampling and investigation of potentially contaminated soil Part 2: Volatile substances.*

Australian Standard AS4482.1-2005 - *Guide to the investigation and sampling of sites with potentially contaminated soil Part 1: Non-volatile and semi-volatile compounds.*

Construction Sciences (2024) *Stage 1 Preliminary Site Investigation, 97-123 and 125-151 Wallgrove Rd, Cecil Park, NSW 2178.*

CSIRO Australian Soil Resource Information System (ASRIS) website: <http://www.asris.csiro.au/mapping/viewer.htm>.

Environment Performance Agreement by Deed, between the Environment Protection Authority and the Land Management Corporation, dated 18 January 1999.

Environment Protection Act 1993.

Geoscience Australia Elvis database (2023) <https://elevation.fsdg.org.au/>

National Environment Protection (Assessment of Site Contamination) Measure 1999 (amended in 2013).

National Environment Protection Council (New South Wales) Act 1995

NSW Contaminated Land Management Act 1997

NSW EPA Waste Classification Guidelines Part 1: Classifying Waste, 2014

NSW EPA Contaminated Land Guidelines 2020

NSW planning portal spatial viewer ([NSW Planning Portal Spatial Viewer](#))

NSW Protection of the Environment Administration Act 1991

NSW Protection of the Environment Operations Act 1997

NSW Waste Avoidance and Resource Recovery Act 2001

Protection of the Environment Operations (Waste) Regulation 2014

Protection of the Environment Operations Act 1997

SEARs (2022) Streamlined Secretary's Environmental Assessment Requirements

WA DOH (2009) Guidelines for the assessment, remediation and management of asbestos contaminating sites

7. LIMITATIONS

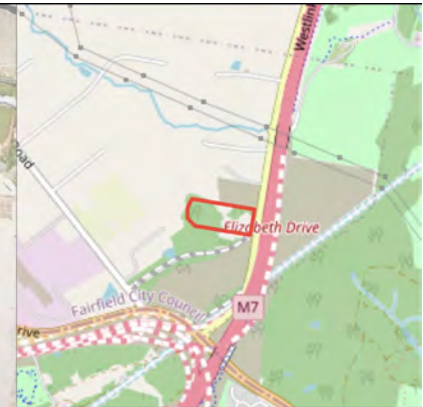
Fyfe has prepared this RAP for the use of Western Sydney Parklands Trust, in accordance with the usual care and thoroughness of the consulting profession. It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this report.

The methodology adopted and sources of information used by Fyfe are outlined in this report. Fyfe has made no independent verification of this information beyond the agreed scope of works and Fyfe assumes no responsibility for any inaccuracies or omissions. No indications were found during our investigations that information contained in this report as provided to Fyfe was false.

This RAP is based on the information provided by Western Sydney Parklands Trust and reviewed at the time of preparation. Fyfe disclaims responsibility for any changes that may have occurred after this time. This RAP should be read in full. No responsibility is accepted for use of any part of this RAP in any other context or for any other purpose or by third parties. This RAP does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

FIGURES





Legend

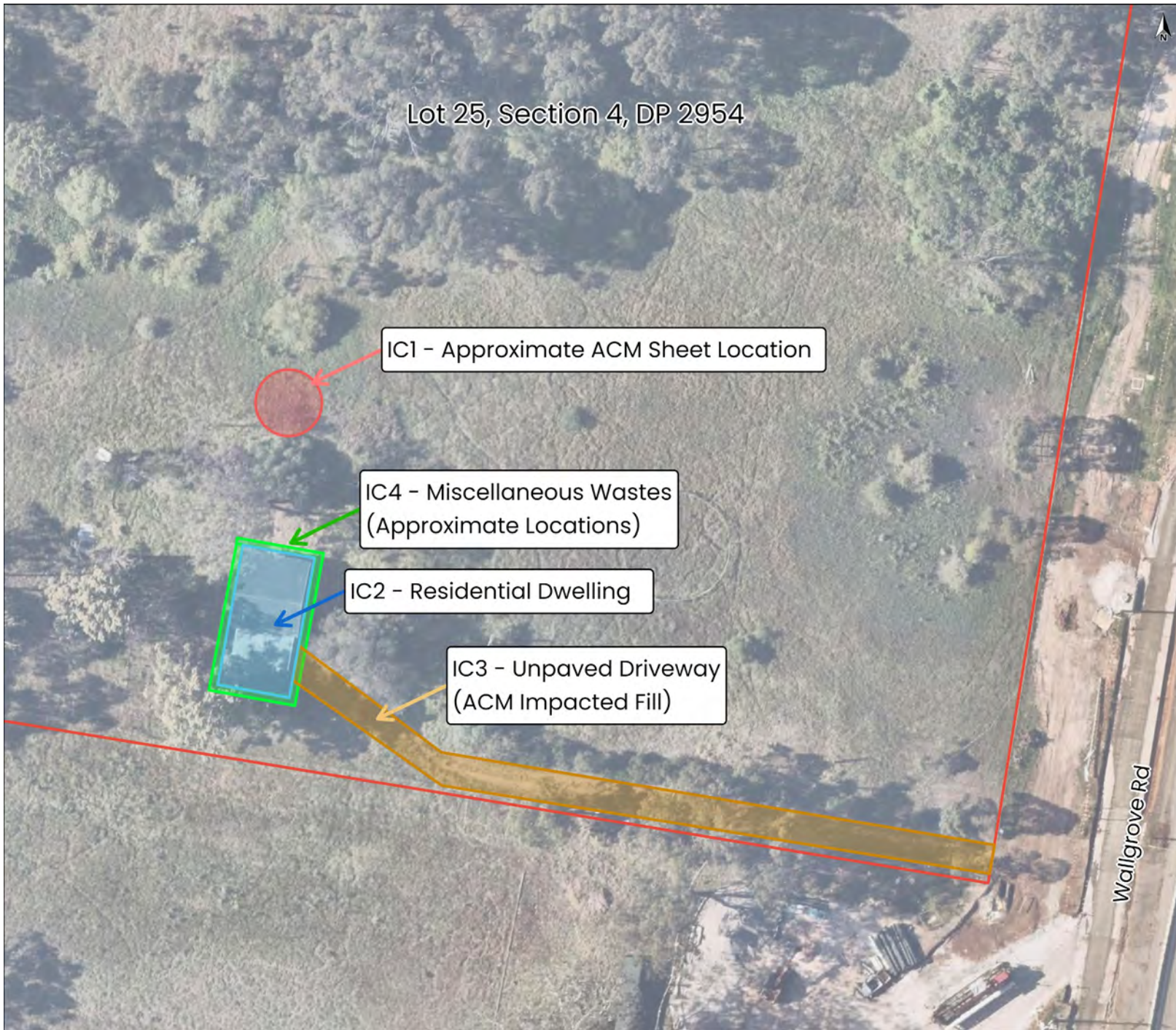
- Site Infrastructure
- Site Boundary

0 25 m 50 m
Metromap by Aerometrex



Produced by [Datanest.earth](https://www.datanest.com.au)

Title: Site Layout and Location Plan		
Client: Western Sydney Parklands Trust		Size: A3
Project: Cecil Park	Drawn: ODP	Figure No: 1
Date: 02-08-2024	Checked: OP	
Proj No: 81971-2	Scale: 1:1300	Version: V0



Lot 25, Section 4, DP 2954

IC1 - Approximate ACM Sheet Location

IC4 - Miscellaneous Wastes
(Approximate Locations)

IC2 - Residential Dwelling

IC3 - Unpaved Driveway
(ACM Impacted Fill)



Legend

- IC1 - Approximate ACM Sheet Location
- IC2 - Residential Dwelling
- IC3 - Unpaved Driveway (ACM Impacted Shallow Fill)
- IC4 - miscellaneous wastes (approximate location)
- Site Boundary

0 5 m 10 m
© Nearmap

FYFE

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Title: Remediation Area Plan

Client: Western Sydney Parklands Trust		Size: A3
Project: Cecil Park	Drawn: ODP	Figure No.: 2
Date: 04-11-2024	Checked: OP	
Proj No: 81971-2	Scale: 1:511	Version: V0