

Audit review and site inspection

Site:	Belmont Desalination Plant Project, 12A Ocean Park Road, Belmont South	Accredited Auditor:	Ben Wackett, Cavvanba Consulting
Proposed Development:	Desalination Plant	Date of Review:	11 September 2024 -
Proposed Land Use:	Commercial/industrial	Scope of review:	<i>Soil and Surface Water Management Sub-Plan; and Unexpected Contamination and Asbestos Finds Procedure.</i>
Client:	John Holland Group	Date of Auditor site inspection:	N/A
Nature of interim advice	To act as site auditor for this project, John Holland Group has engaged Ben Wackett, a New South Wales Environment Protection Authority (EPA) accredited site auditor, employed by Cavvanba Consulting Pty Ltd (Cavvanba). The final outcome of this engagement is to deliver a site audit statement (SAS) and associated site audit report (SAR), based on the objectives of the site audit. This audit review makes comments only and does not constitute a SAS or SAR. It is provided to assist John Holland Group in the assessment and management of contamination issues at the site. The information provided herein should not be considered pre-emptive of the final site audit conclusions, but rather represents the site auditor's opinion based on the current review of available site information. The auditor comments appear in the table below, and it is expected that the consultant will address each comment. Refer to Attachment 1 for information regarding the scope of site audits and associated limitations. Attachment 1 forms part of this audit review.		
Audited Reports:	John Holland Group (2024) <i>Belmont Desalination Plant Project, Appendix C – Soil and Surface Water Management Sub-Plan</i> (Ref. CS1135-WT-BEL-EN-PLN-0021 Rev B) word document; John Holland Group (2024) <i>Belmont Desalination Plant, Unexpected Contamination and Asbestos Finds Procedure</i> (Ref. CS1135-WT-BEL-EN-PRO-0004 Rev B); and John Holland Group (2024) <i>Belmont Desalination Plant, Appendix D – Acid Sulfate Soil Management Plan</i> (Ref. CS1135-WT-BEL-EN-PLN-0018 Rev B).		
Consultant:	John Holland Group	Audit Number:	1508-2402

Comment No.	Auditor comment (11 September 2024)	Consultant response	Action
Soil and Surface Water Management Sub-Plan			
1	Please check abbreviations and terminologies. For example: The title is abbreviated as SSWMSP, however the abbreviation used is CSWMSP. The word document and the pdf appear to have different titles and the references throughout the document have been updated. SGC02 refers to a contaminated <u>site</u> management plan (CSMP) SGC03 also refers to a CSMP however it is a contaminated <u>soil</u> management plan. CSMP is not listed in the terms and abbreviations. Check interchangeable use of <i>unexpected contamination finds procedure</i> and <i>unexpected contamination and asbestos finds procedure</i>.	Updated reference to CSWMSP Updated to align with REMMS -i.e. 'site' replaced with 'soil' Updated as per above comment Abbreviations updated to include CSWP Checked and updated to refer to 'Unexpected Contamination Procedure' to align with CoA C23	Closed
2	<i>Section 1.4:</i> Given the scope of CoA C28, it is also a requirement for the auditor to review this plan.	Section 1.4 updated to include reference to Cavvanba	Closed
3	<i>Section 3.1:</i> The acid sulfate soil guidance should be consistent with the documents described in the ASSMP.	Section .1 updated to align with documents described in ASSMP	Closed
4	<i>Section 4.2.4:</i> CoA D34 refers to "<i>the proposed development must not result in a change of risk in relation to any pre-existing contamination</i>". It is recommended that adequate investigation is undertaken and a contaminated land report is prepared which makes specific reference to this requirement and the proposed development. This should be reviewed by the site auditor. This aspect should be discussed in Section 4.2.4, and included in SGC02.	Further investigation not considered to be required at this stage. Existing contamination identified at the site i.e. asbestos A-horizon soils area will be remediated. For the remainder of the site, no further contamination is anticipated because of implementation of mitigation measures i.e. Spill prevention and response and erosion and sediment controls	Closed
5	<i>Section 4.2.4:</i> It is recommended that the reporting process outlined in NSW EPA (2020) <i>Consultants reporting on contaminated land</i> is included here.	Reference to EPA guideline included here.	Closed

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	This section would also benefit from a description of the role of the site auditors and consultants which is described in Section 1.5 of the Auditor Guidelines. These guidelines also describe a multi-stage audit in Section 3.6.2, which is relevant to this project.		
6	<i>Section 6.1:</i> Check CSWMSP23 reference to Section 6.1.5 (assumed 6.1.4). It is recommended that evidence of Auditor review for relevant construction phase contaminated land aspects are "interim site audit advice" rather than Site Audit Statement (SAS).	Reference updated Wording updated to refer to interim site audit advice	Closed
7	<i>Section 7.5.</i> It is worth including a note here that this section does not apply to Contaminated Land Auditing under the meaning of the CLM Act.	Note included.	Closed
8	<i>Section 6.1.4.1:</i> If development of an environmental management plan (EMP) is part of a proposed remediation method, consideration needs to be given to: – feasibility of encapsulation (as risk described in CoA D34); and – legal enforceability.	Wording included in section 6.1.4.1	Closed
Unexpected contamination and asbestos finds procedure			
9	<i>Section 4.1:</i> The listed asbestos removal techniques should be referred to as investigation techniques, or sampling methods for evaluating asbestos contamination.	Updated to refer to 'investigation' techniques	Closed
Acid Sulfate Soils Management Plan			
10	<i>Section 4:</i> The ASSMP and the liming requirements should be updated to take into account the findings of the ASS investigation – i.e. GHD (2023).	Noted – background information from CSWMP has been included in ASSMP	Closed
11	<i>Section 5.6:</i> Consideration should be given to the use of reducible chromium suite, rather than SPOCAS, in case accordance with best practice and Dept. of Agriculture, Waste and the Environment, 2022 guidance.	Reference to reducible chromium suite included as an option in section 5.6	Closed

Attachment 1 – Scope and limitations to site audits

Scope of audits

Whereas interim site audit advice is provided to assist in the assessment and management of contamination issues at the site, the interim site audit advice should not be regarded as 'approval' of any proposed investigations or remedial activities, as any such approval is beyond the scope of an independent review.

In NSW, the site assessment and audit process consists of:

- (i) the contaminated land consultant, or other relevant party, *designs and implements* the site assessment and, where required, all remediation and validation activities to achieve the stated objectives; and
- (ii) the site auditor *independently reviews* the works undertaken to ensure that they comply with current regulations, standards and guidelines, and that the site has been assessed, remediated and validated to a standard appropriate to the proposed landuse.

Therefore, the contaminated land consultant and other relevant parties should be satisfied that the work to be conducted conforms to all appropriate regulations, standards and guidelines and is suitable based on the site history and the proposed landuse.

Provision of interim site audit advice addressing assessment reports, management plans and the like does not constitute approval of these documents or actions proposed therein. 'Approval' is inconsistent with the concept of a site audit, that is an independent third party review.

Rather, where interim site audit advices describe such documents as appropriate or similar, this means that the site audit is in general agreement that the document fulfils the intended purpose, consistent with the scope of site audits described above. 'Approval' of reports or plans is by definition a statutory function, and the *Contaminated Land Management (CLM) Act 1997* does not provide accredited site auditors authorisation for statutory functions.

Limitations to site audits

This site audit relates only to those matters relevant to the CLM Act, which describes that "The general object of this Act is to establish a process for investigating and (where appropriate) remediating land areas where contamination presents a significant risk of harm to human health or some other aspect of the environment".

Contaminated land site audits do not seek to provide an opinion regarding:

- other aspects of the environment not related to site contamination; or
- to the suitability of the site in regard to landuse planning and legal use of the land; or
- the occupational health and safety legislation; or
- the suitability of any engineering design.

Accordingly, reviews of such information are only in relation to the contaminated land aspects of any projects or sites. If specialist technical review of such documents is required, these should be obtained by appropriate specialist.

By definition, site auditing involves the review and critique of consultants' and contractors' work, including, amongst others, site histories, site surveys, subsurface investigations, chemical and physical analyses, and risk assessments and modelling. Accordingly, Cavanba relies on the experience, expertise and integrity of the relevant organisations. The information sources referenced have been used to determine site history and local subsurface conditions. While Cavanba takes reasonable care to avoid reliance on data and information that is inaccurate or unsuitable, Cavanba is not able to verify the accuracy or completeness of all information and data made available.

Sampling and chemical analysis of environmental media are based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based

on the regulatory requirements and site history, not on sampling and analysis of all media at all locations for all potential contaminants.

Limited environmental sampling and laboratory analyses were undertaken as part of the investigations reviewed by Cavvanba, as described herein. Ground conditions between sampling locations may vary, and this should be considered when extrapolating between sampling points. Except at each sampling point, the nature, extent and concentration of contamination is inferred only. Furthermore, the test methods used to characterise the contamination at each sampling point are subject to limitations and provide only an approximation of the contaminant concentrations. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this site audit are based on the available information at the time of the investigations.

As environmental sampling is based on achieving suitable sampling densities, rather than sampling all media at all locations, and analysis is based on site histories and likely contaminants of concern, rather than analysis of all media at all locations for all potential contaminants, the absence of any identified hazardous or toxic materials at the site should not be interpreted as a warranty or guarantee that such materials do not exist at the site. Therefore, future work at the site which involves subsurface excavation should be conducted based on appropriate management plans. These should include, *inter alia*, environmental management plans, including unexpected findings protocols, hazardous building materials management plans, and occupational health and safety plans.