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+61 438 483 852

Kael Williams
Project Manager

Fjmohen@gmail.com

MostynCopper
Suite 2 Level 8
60 Pitt Street, Sydney
NSW 2000

Interim Site Audit Advice (Site Audit Memo 21) Site Audit FM121 – Cricket NSW – Proposed Management of TP37 Area

Dear Kael

Introduction

FJM Consulting Pty Ltd was engaged by MostynCopper on behalf of NSW Cricket Association (Cricket NSW) to provide Frank Mohen as a NSW EPA Accredited Contaminated Site Auditor (the Site Auditor) under the Contaminated Land Management (CLM) Act 1997, for the investigation and remediation of Wilson Park, where Cricket NSW propose to build the Western Sydney Cricket and Community Centre.

This Interim Site Audit Advice (ISAA) does not constitute a Site Audit Report or Site Audit Statement (SAR/SAS), as defined in the Contaminated Land Management Act 1997, but rather provides interim advice as part of the site audit.

Purpose of Memo/ Documents Reviewed

The purpose of this memo is to provide interim advice in relation to the following documents which have been reviewed by the Site Auditor:

Memorandum: Western Sydney Cricket and Community Centre, Silverwater. Proposed Management of TP37 Area. Douglas Partners Pty Ltd (DP), 18 June 2021, document reference 86694.09.M.014.Rev0 (the TP37 Memo)

Site Auditor Review Comments

The Auditor has reviewed the above document and provides the following comments.

General

The TP37 Memo was prepared by DP *“to formalise the proposed Stage 1 management of contamination identified previously by DP at TP37 (and surrounds), being a location of significant tar impact in fill”*.

DP previously completed investigations at the site that identified tar impacts in fill materials at location TP37. A further investigation to delineate the tar impacts was also completed by DP, where strong hydrocarbons odours and the presence of tar residue and black staining was noted in several test pits.

While location TP37 and several other test pits where tar impacts were identified were within the Stage 2 development area, due to the lack of capping materials above the tar impacted fill (less than 0.5 m in several locations), the Contamination Management Plan / Remediation Action Plan (CMP/RAP) prepared by DP required management works to be completed prior to the commencement of Stage 2 works (i.e. as part of the Stage 1 works). The CMP/RAP requirements included:

- in the areas where tar impacted fill was identified within 0.5 m of the site surface (shown as shaded red on Drawing 104 of the CMP/RAP and included in the TP37 Memo), excavation to a minimum of 0.5 m below ground surface (bgs) and backfilling with manufactured nutrient-rich soils followed by vapour monitoring to validate the suitability of the area for public recreation; and
- in areas where tar impacts were greater than 0.8 m bgs (shown shaded blue on Drawing 104), no action as part of Stage 1 required.

Proposed Stage 1 Management of TP37 Contamination

The TP37 Memo proposes that areas shaded red in Drawing 104 will be excavated to a minimum of 0.5 m below current ground levels, then backfilled with nutrient rich soils (0.5 m thick), overlain by 0.2 – 0.5 m of sandstone (imported Rozelle Tunnel Spoil) and finished with a minimum of 0.1 m topsoil/turf.

The TP37 Memo further states that excavated materials will be relocated to an emplacement area within Oval 1, which will be covered with manufactured nutrient-rich soils (0.5 m thickness), 0.5 m of imported sandstone (Rozelle Tunnel Spoil) and 0.35 m of landscape materials.

The specification of the manufactured nutrient-rich soil was described as 70% Rozelle Tunnel spoil (confirmed to have a clay content of 11%) and 30% mulch and compost mix. The TP37 Memo included documentation confirming the materials contains Nitrogen (N), Phosphorus (P) and Potassium (K) and confirming compliance with the ‘NSW EPA Pasteurised Garden Organic Order 2016’.

Auditor Comments

The Auditor considers that the proposed management strategy presented in the TP37 Memo is generally consistent with the requirements of the CMP/RAP. Minor deviations from the CMP/RAP were noted as follows:

- The CMP/RAP requires excavation to 0.5 m bgs and backfilling with a minimum of 0.5 m of nutrient-rich soils in the red shaded area around TP37. The TP37 Memo proposes that backfilling will comprise a thickness of up to 1.1 m, including at least 0.5 m of nutrient-rich soil. The Auditor considers this to be acceptable.
- The proposed emplacement area for soils excavated from around TP37 is different to that shown in the CMP/RAP, although both are within Oval 1. The Auditor considers that this does not affect intended outcome of the CMP/RAP and is acceptable.
- The CMP/RAP requires that the emplacement area be covered by a minimum of 0.5 m nutrient-rich soil with an overall capping thickness of not less than 1 m. The capping outlined in the TP37 Memo meets or exceeds this thickness and is therefore acceptable.
- The composition of the 'nutrient-rich soil' is generally consistent with the CMP/RAP (and previous RAP prepared for the site).

Therefore, all works are proposed to be completed in general accordance with the CMP/RAP, including the requirement for vapour monitoring following excavation and backfilling of the TP37 (red shaded) area. The Auditor notes that the validation of both the TP37 excavated area and the placement area should be performed as set out in Section 16.2 and 9.7 of the CMP/RAP.

The Auditor notes that, in accordance with previous correspondence (SAM09, 21 January 2021), the Auditor stated with regards to the Rozelle Tunnel spoil: *"the Auditor considers that RITS [Rozelle Interchange Tunnel Spoil] is not suitable for use at the final surface level of the site and should be covered with topsoil of no less than 300 mm or an agreed alternative thickness"*. In the TP37 excavation area there is only 100 mm of topsoil/turf proposed to be installed above the imported sandstone, which does not meet the above requirements if this is to be the Rozelle tunnel spoil. The Auditor requires that, in accordance with SAM09, a minimum of 300 mm topsoil is installed (or a justified and agreed alternative thickness), or sandstone from an alternative source is used to form the near-surface capping layer.

Conclusions

The Auditor considers that the management strategy outlined in the TP37 Memo is generally in accordance with the CMP/RAP and is acceptable, subject to:

- completion of all works in accordance with the requirements of the CMP/RAP, noting the deviations listed above; and
- installation of a minimum 300 mm of topsoil over imported sandstone sourced from the Rozelle Interchange Tunnel Spoil.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'JL Mohen', with a stylized, cursive script.

Frank Mohen
NSW Site Auditor No. 9801
FJM Consulting Pty Ltd