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Interim Site Audit Advice (Site Audit Memo 26) Site Audit FM121 – Cricket NSW – Review of material suitability for import – Cricket Wicket Soils – Queensland and Western Australia

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:

Douglas Partners Pty Ltd (DP) 2021a, Memorandum 018, Western Sydney Cricket and Community Centre, Wilson Park, Silverwater – Assessment of Materials for Proposed Import, Cricket Wicket Soil, Blanches Road, Lower Mount Walker, Queensland, 29 July 2021 (reference: 86694.09.M.018.Rev0)

Douglas Partners Pty Ltd (DP) 2021b, Memorandum 019, Western Sydney Cricket and Community Centre, Wilson Park, Silverwater – Assessment of Materials for Proposed Import, Cricket Wicket Soil, 1631 Coronation Road, Waroona, WA, 29 July 2021 (reference: 86694.09.M.019.Rev0)

Site Auditor Review Comments

The materials referred to in the above documents are intended to be imported to the Wilson Park remediation site for use in the construction of the practice cricket wicket.

To assess the suitability of the materials for import, DP undertook an assessment of the soils comprising an inspection of the source sites (both private farm properties) and collection and analysis of selected samples for comparison to background contaminant concentrations and the site assessment criteria (SAC) presented in the Contamination Management Plan / Remediation Action Plan (CMP/RAP) for the Site (DP, 2020).

Site 1

DP (2021a) described the material from Lot 11 on RP808752, Blanchs Road, Lower Mount Walker, Queensland (the QLD site) as high plasticity, dark brown to black clay with traces of fine-grained sand. Approximately 160-170 tonnes of soil will potentially be imported to Wilson Park from the QLD site.

Three samples were collected from hand auger boreholes at a depth of between approximately 0.3 m - 0.4 m below ground surface (bgs), within the area identified as being the location of soils proposed to be imported to Wilson Park. The samples were placed in glass jars and transported to ALS laboratories for testing of the following analytes:

- metals (arsenic, beryllium, boron, cadmium, chromium, cobalt, copper, lead, manganese, mercury, nickel, selenium and zinc);
- total recoverable hydrocarbons (TRH);
- benzene, toluene, ethylbenzene and xylene (BTEX);
- polychlorinated biphenyls (PCBs);
- polycyclic aromatic hydrocarbons (PAHs);
- organochlorine pesticides (OCPs);
- organophosphate pesticides (OPPs);
- phenols; and
- asbestos.

DP (2021a) stated that the soil for import is to be excavated from between 0.1 m and 1.0 m bgs, stockpiled, blended using a rotary hoe and turned over 3 – 5 times before leaving the source site. The soils will then be transported and undergo biosecurity treatment, blended, ground and then transported to NSW. No other materials are mixed with the soil.

Site 2

DP (2021b) described the material from 1631 Coronation Road, Waroona, Western Australia (the WA site) as medium to high plasticity dark brown silty clay. Approximately 160-170 tonnes of soil will potentially be imported to Wilson Park from the WA site.

At the time of the WA site inspection, the area identified as the location of soils to be imported to the Wilson Park site was submerged. Therefore, three samples were collected from material stored in 1 m³ bulk bags. The samples were placed in glass jars and transported to ALS laboratories for testing of the following analytes:

- metals;
- TRH;
- BTEX;
- PCBs;
- PAHs;
- OCPs;
- OPPs;
- phenols; and
- asbestos.

DP (2021a) stated that the soil for import is excavated following stripping of topsoil and placed in bulk bags for export. No other treatment is applied to the clay, although it was noted that herbicides are sprayed across the source area every 2 years.

DP conclusions

DP (2021a and 2021b) concluded that the soil from the QLD and WA sites, respectively, classified as virgin excavated natural material (VENM) and no concentrations of contaminants of concern were reported above the SAC. The material was therefore considered suitable for import to the Wilson Park site subject to:

- an inspection and check sampling by DP of the imported materials at the Wilson Park site, with check sampling to be conducted at a rate of three samples for the first 1000 m³, and one sample per 1000 m³ thereafter;
- should an inspection of the materials or check sample fail to meet the SAC, then the sampled load will be rejected and removed from the receiving site. Additional sampling may then be required to verify compliance of the remainder of the imported materials from that source, both already on the receiving site and any additional loads from the storage site;
- acceptance of the material by the Site Auditor; and

- a gate keeper must be assigned by the civil contractor to monitor and accept the incoming materials as per the CMP/RAP.

Auditor conclusions

The Auditor agrees with the conclusions of DP (2021a and 2021b), that the materials as inspected and sampled meet the classification of VENM and are suitable for importation to the Wilson Park site, subject to the requirements outlined in DP (2021a and 2021b) and listed above. The Auditor also notes:

- DP (2021a and 2021b) state *“a Biosecurity Exemption Application has been submitted to NSW Department of Primary Industries (DPI), and that the materials have been cleared”*. The Auditor acknowledges that interstate movement of the soils is outside the scope of the materials suitability assessment, however, requests that documentation confirming permission to transport the soils interstate and any bio-security clearance is provided when the soils are imported to the site.
- DP (2021b) states that soils at the WA site are sprayed with herbicides every two years. The Auditor notes that no evidence of herbicide contamination was reported in the samples collected from the WA site. It should be confirmed by the source site owner that soils imported to the Wilson Park site have not been recently sprayed with herbicides, and herbicides must be included in the analytical suite for all check samples from this location.

Yours faithfully,

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

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