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Interim Site Audit Advice (Site Audit Memo 29) Site Audit FM121 – Cricket NSW – Review of landscape material for proposed landscaping

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:

Benedict Sand and Gravel Statement of Compliance, dated 17 June 2022;

Bingo Industries Supply Docket (reference: SF219 Supp. Docket – Urban Wood), dated 8 June 2022;

Cleanaway Product Data Sheet: Soil Improver 20 mm, dated 20 May 2022;

Douglas Partners (DP), 2022, Memorandum 009: Western Sydney Cricket and Community Centre Wilson Park Silverwater, Assessment of Materials for Proposed Landscaping (reference 86694.11.M.012.Rev0), dated 17 June 2022;

Email from Daniel Nguyen (Buildcorp), dated 20 June 2022;

Environmental Analysis Laboratory Composts, Soil Conditioners and Mulches Report (4500268702). Sample date 25 June 2021. Reported 26th August 2021;

Envirolab Services Certificate of Analysis (287874), dated 9 February 2022;

Envirolab Services Certificate of Analysis (290092), dated 8 March 2022;

NSW EPA (2020) letter to Cement Concrete and Aggregate Australia, dated 6 March 2022;

Suez Statement of Compliance – supply of ARRTTM Soil Improver, dated 19 January 2021.

Site Auditor Review Comments

The material referred to in the above documents is intended to be imported to the Wilson Park remediation site for use as landscaping materials.

The DP Report on Contamination Management Plan/Remediation Action Plan (CMP/RAP), Western Sydney Cricket and Community Centre, 4 Newington Road, Silverwater (Reference 86694.05.R.004.Rev1) dated November 2020 (DP, 2020) states that all material imported to the site for landscaping must comprise either:

- Virgin Excavated Natural Material (VENM); or
- Material complying with general or specific Resource Recovery Orders (RRO) under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014, which permits land application.

The CMP/RAP (DP, 2020) also states that all imported material with documentation will also be subject to “check” sampling and tested by the Environmental Consultants at specified rates and compared to the site acceptance criteria.

Further detail on each of the three materials is provided below.

4 mm washed sand (Benedict Sand and Gravel)

It is understood that approximately 100 m³ will be imported to Site. The Auditor considers that the DP (2022) comments are appropriate:

- *The 4 mm washed sand is claimed to be quarried natural material, which is considered to be equivalent to a VENM classified material, which complies with Section 12.1 of DP (2020).*

A statement of compliance was provided by Benedict Sand and Gravel, dated 17 May 2022 which states the product is a quarried material.

4-16 mm Timber Wood Chips (Bingo Industries)

It is understood that approximately 200 m³ will be imported to Site. The Auditor considers that the DP (2022) comments are appropriate:

- *The timber wood chips complies with the Mulch Exemption 2016 which is a general Resource Recovery Order (RRO) under the Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014, which permits land application, which complies with Section 12.1 of DP (2020);*

The Mulch Exemption 2016 states that ‘where there is a significant risk of the presence of physical and chemical contaminants in plant material, such as from kerbside waste collections, this waste stream must be assessed against and comply with the conditions of the Pasteurised Garden Organics Order 2016’. The processor must ensure that the material does not contain asbestos, engineered wood products and preservative treated or coated wood residues. Four samples were collected to demonstrate evidence compliance, presented in Envirolab COA 287874 and COA 290092. The results indicate:

- OCPs were below the laboratory limit of reporting in the four samples analysed.
- Glass, metals and plastics were <0.05% dry rate in the four samples analysed.
- Asbestos was not detected in the four samples analysed.
- Heavy metals were the laboratory limit of reporting in the eight samples analysed with the exception of trace copper in one sample (1 mg/kg) and zine in all samples ranging from 2 mg/kg to 8 mg/kg. These concentrations are below the adopted site assessment criteria presented in Section 6.1 of the CMP/RAP (DP, 2020).

Soil Improver 20 mm (Suez)

It is understood that approximately 100 m³ will be imported to Site. The Auditor considers that the DP (2022) comments are appropriate:

- *The Soil Improver 20 mm complies with the Pasteurised Organics Order 2016 which is a general Resource Recovery Order (RRO) under the Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014, which permits land application, which complies with Section 12.1 of DP (2020).*

The Pasteurised Garden Organics Order 2016 requires processor to ensure the material does not contain glass, metal or plastic residues. One sample was collected to demonstrate compliance, presented in EAL report (reference 4500268702) Glass, metals and plastics were <0.01% dry rate. In addition, the sample was analysed for pH, electrical conductivity, organic carbon, nitrogen, nitrates, phosphate, cations and heavy metals. Heavy metals were detected at concentrations below the adopted site assessment criteria presented in Section 6.1 of the CMP/RAP (DP, 2020).

A statement of compliance was provided by Suez, dated 19 January 2021 which states the product complies with the Pasteurised Garden Organics Order 2016.

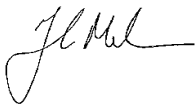
Based on the above the Auditor considers the DP (2022) conclusions and recommendations are generally appropriate, being:

Based on the review of the documents listed above, the proposed landscaping material (4 mm washed sand, 4-16 mm timber woods chips and soil improver 20 mm are considered o be suitable, from a contamination perspective, for importation and placement at the receiving site, subject to the following:

- *An inspection and check sampling by DP of the imported material is conducted at the receiving site as per Section 12.1 of DP (2020). It is recommended that check sampling be conducted at a rate of three samples for the initial 1000 m3 (or part thereof) then one sample per 5,000 m3 thereafter.*
- *Should an inspection of the material or check sample fail to meet the SAC in Section 6.1 of the DP (2020) the sampled load will be rejected and removed from the 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 source site;*
- *Materials imported under the Resource Recovery Orders should be applied in accordance with the requirements of the relevant Resource Recovery Exemption;*
- *Acceptance of the material must also be approved by the Site Auditor; and*
- *A gate keeper must be assigned by the civil contractor to monitor and accept the incoming materials as per Section 12.1 of DP (2020).*

In summary: **The Auditor agrees with the conclusions and recommendations provided by DP (2022).**

Yours faithfully,



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