

27 July 2022

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Interim Site Audit Advice (Site Audit Memo 30) Site Audit FM121 – Cricket NSW – Review of materials proposed for import for road pavement construction

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 (DP), 2022, Memorandum 013: Western Sydney Cricket and Community Centre Wilson Park Silverwater, Assessment of Materials Proposed for Import DGB20 (reference 86694.11.M.013.Rev0), dated 26 July 2022;

ASCT (2022a) Laboratory Report 1038 dated 14 June 2022 for tests conducted 16 May 2022 to 30 May 2022;

ASCT (2022b) Laboratory Report 1043 dated 14 June 2022;

ASCT (2022c) Laboratory Report QSM 1 dated 14 June 2022;

(SAL 2022) Soil Analytical Laboratories Report SAL28229C dated 27 May 2022; and

Boral (2022) Test Report No 267529 dated 2 June 2022.

ECO Resource Recovery (2022a) Letter dated 14 July 2022;

ECO (2022b) Spreadsheet of Results including monthly and annual averages.

Resource Laboratories (RL) (2022a) Test Report 22-0009, Report 4 dated 2 May 2022;

RL (2022b) Test Report 22-0009, Report 5 dated 6 June 2022;

RL (2022c) Test Report 22-0009, Report 7 dated 12 July 2022;

ALS Environmental (2022a) Certificate of Analysis EN2203740 dated 29 April 2022;

ALS Environmental (2022b) Certificate of Analysis EN2218029 dated 31 May 2022; and

ALS Environmental (2022c) Certificate of Analysis EN2206309 dated 5 July 2022.

Site Auditor Review Comments

The material referred to in the above documents is intended to be imported to the Wilson Park site for use as part of road pavement construction.

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 as aggregate (e.g. base course) 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.

It is understood that approximately 150-200 tonnes of aggregate are proposed to be used as part of the project.

Relevant information relating to the laboratory reports include:

- The sampling frequency is considered appropriate.
- The electrical conductivity met the absolute maximum concentration in RL (2022a), RL (2022b) and RL (2022c) but exceeded the average allowable concentration in RL (2022b) and RL (2022c). The other parameters complied with NSW EPA (2014) Resource Recovery Exemption under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014, The recovered aggregate order 2014 (the Order) (EPA, 2014). However, the rolling annual average and February and May quarter for electrical conductivities provided in the summary spreadsheet were within the allowable average concentration in EPA (2014). The other average results for the parameters listed in the spreadsheet for these periods also complied with EPA (2014);
- No asbestos was reported in the ALS (2022a), ALS (2022b) and ALS (2022c); and
- The analyte concentrations reported test certificates RL (2022a), RL (2022b) and RL (2022c) and ALS (2022a), ALS (2022b) and ALS (2022c) are within the site assessment criteria (SAC) of Section 6 of DP (2020)

The Auditor considers that the DP (2022) comments are appropriate:

Based on the review of the documents provided, the subject material reported in the documents is considered to 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 as per Section 12.1 of DP (2020) prior to its placement at the site. It is recommended that check sampling be conducted at a rate of three samples per the initial 1000 m³ (or part thereof), then one sample per 1,000 m³ thereafter (assuming the initial three samples confirm suitability of the materials);*
- *Analysis of the check samples in line with DP (2020). In addition, electrical conductivity is to be included in the analytical suite based on the results of RL (2022b) and RL (2022c);*
- *Should a check sample fail to meet with site assessment criteria (SAC) in Section 6.1 of 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 on the receiving site and any additional loads from the source site;*
- *Acceptance of the material must also be approved by the Site Auditor;*
- *The material must be applied as required under EPA (2014b); and*

- *A gate keeper must be assigned by Buildcorp 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,

A handwritten signature in black ink, appearing to read 'J. M. Mohen', written in a cursive style.

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