JBS&G 69307 | 174,304 (Rev 3)

L02 Spill Management Plan – Gregory Hills Data Centre

27 March 2026

Mikky Baroni
FDC Construction (NSW) Pty Ltd
Via email: mikkyb@fdcbuilding.com.au

Spill Management Plan for SYD091 Sydney Data Centre, 43-61 Turner Road, Gregory Hills NSW

Dear Mikky,

1. Introduction

1.1 Project Description

JBS&G Australia Pty Ltd (JBS&G) was engaged by FDC Construction (NSW) Pty Ltd (FDC) to prepare a Spill Management Plan (SMP), in accordance with the State Significant Development Application (SSDA) Consent SSD-680137154 for the construction of the proposed SYD091 Main Works project, located at 43-61 Turner Road, Gregory Hills, NSW (the site). This SMP has been prepared for incorporation with Construction Environmental Management Plan (CEMP) developed for the site by FDC. The Consent enables the following works to occur:

- Construction of 12 data halls;
- A high voltage substation;
- Emergency back-up generators;
- Cooling plant, diesel and lithium-ion battery storage; and
- Associated infrastructure, landscaping and earthworks.

FDC are currently delivering the SYD091 Early Works under a Camden Council Development Application (DA) Consent (DA/2024/616/1.). This approval enables delivery of:

- The demolition and clearance of existing structures and vegetation;
- Completion of bulk earthworks and installation of retaining walls; and
- Public Domain works which includes provision of HV power, stormwater installation and pavement build ups with a new access road.

In its existing state, the development has undergone dam decommissioning, site clearance, bulk earthworks, and sediment erosion and control measures have been implemented. Site access will be via Central Hills Drive with predominant neighbouring properties located on this side of site. There are industrial neighbouring properties to White Cliffs Avenue, opposite side of Turner Road and residential area along Pioneer Street. There is a Riparian Zone located east of 61 Turner Road which will be fenced off to deter any access into this area.

Figure 1-1: Site Aerial (source: Nearmaps)

The SSDA approved Main Works SSD-680137154 will occur concurrently with the Early Works DA/2024/616/1. This SMP has been prepared in accordance with the Main Works consent condition GW02.

Effective implementation of the CEMP and its Sub-Plans will ensure the Project complies with the Consent Conditions, the mitigation measures (identified in the consent, SSD-680137154), and all relevant Acts, Regulations, Standards, and Government Policies.

This plan applies to all staff, workers, and sub-contractors involved in the construction project.

1.2 Staging

This development will be delivered in a single stage with the Early Works and Main Works delivered concurrently under the two development approvals previously discussed:

DA/2024/616/1 – Early Works

- Early Works – Bulk Earthworks, Retaining Walls and Public Domain Works

SSD-680137154 – Main Works

- Construction Certificate 1 – Bulk Excavation and Substructure Works;
- Construction Certificate 2 – Remaining Structure, Façade, Fit out of ROMP 1 & 2 and landscaping; and
- Main HV Substation Works are delivered prior to occupation by an accredited contractor in accordance with the utility provider.

Refer to **Figure 1-2** for Early Works extent and **Figure 1-3** for Main Works extent.

The overall Early Works site plan is shown on **Figure 1-2** below. The Early Works includes decommissioning of pre-existing dams, demolition of dwellings, bulk earthworks, as well as the delivery of surrounding roads.

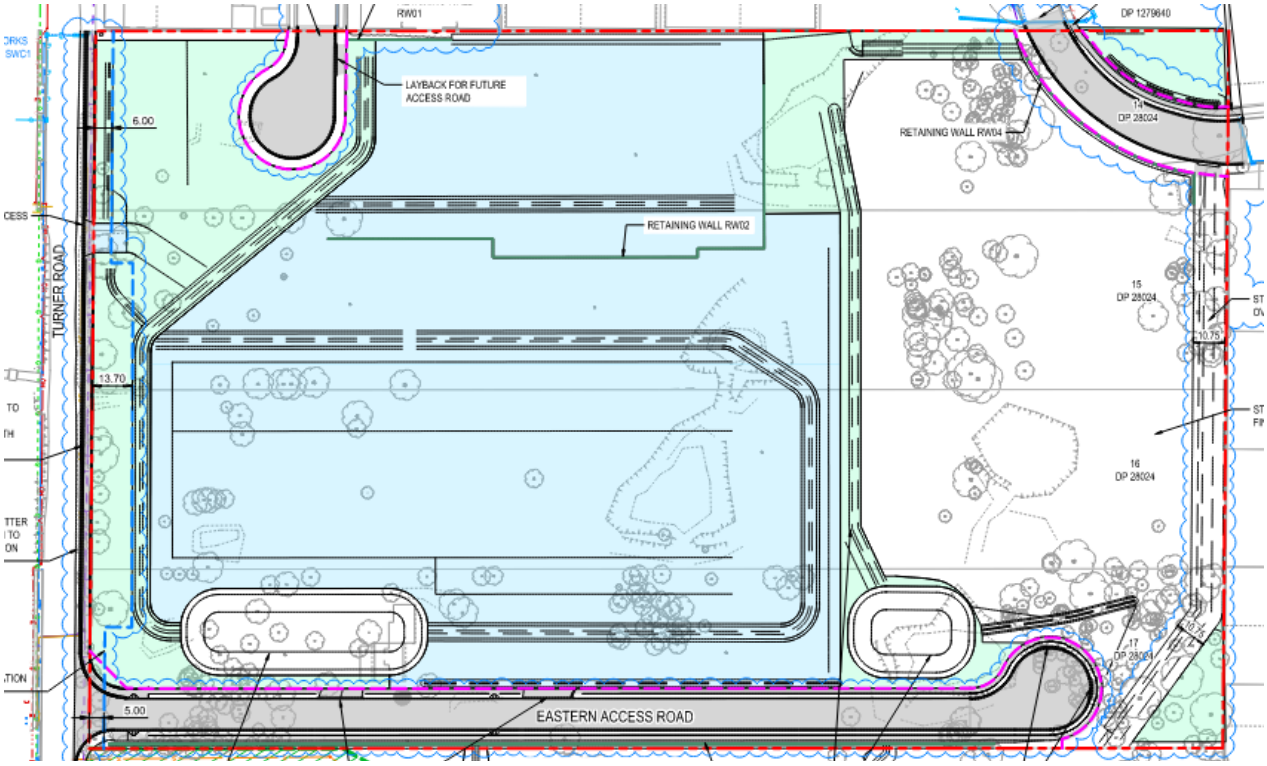


Figure 1-2: Early Works Site Diagram

The overall site plan for the Main Works is shown on **Figure 1-3** below. The 12 Hall Data Centre is split among two levels and is surrounded by landscaped areas, pavements and ancillary buildings.

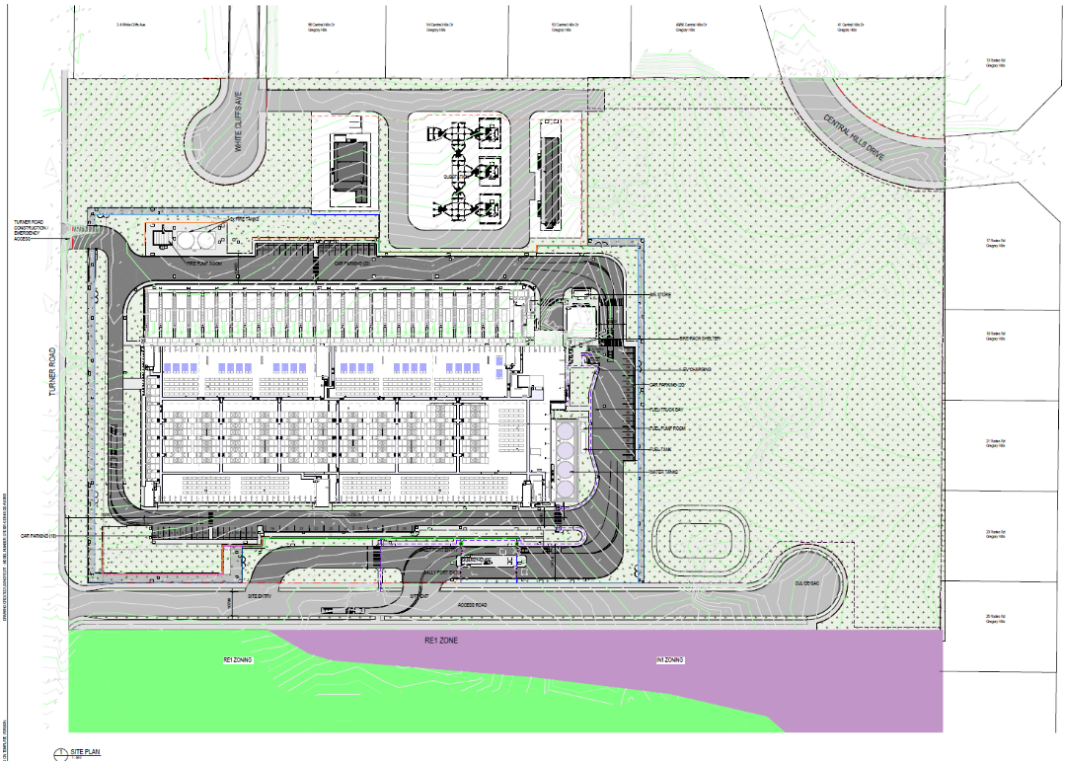


Figure 1-3: Main Works Site Diagram

1.3 Project Location

Refer to Figure 1-4 below for the Site Location. The site is located at Lot 14, 15, 16 and 17, DP 2802, 43-61 Turner Road, Gregory Hills, NSW, 2557, within the Camden Local Government Area (LGA) and is governed by the Turner Road Precinct Development Control Plan (DCP) 2018. The Project is bound by Turner Road to the south, and Rodeo Drive to the north. On the east side of the project, there is an existing nature reserve, and the west contains several existing industrial developments.

Figure 1-4: Site Location

Refer to **Figure 1-5** for Site Overlay. The site is approximately 9.74 hectares (ha) and situated within a General Industrial (IN1) zone, with adjacent land uses including IN1 and Business Development (B5) to the north, a mix of Public Recreation (RE1) and IN1 to the east, Productivity Support (E3) to the south, and IN1 to the west.

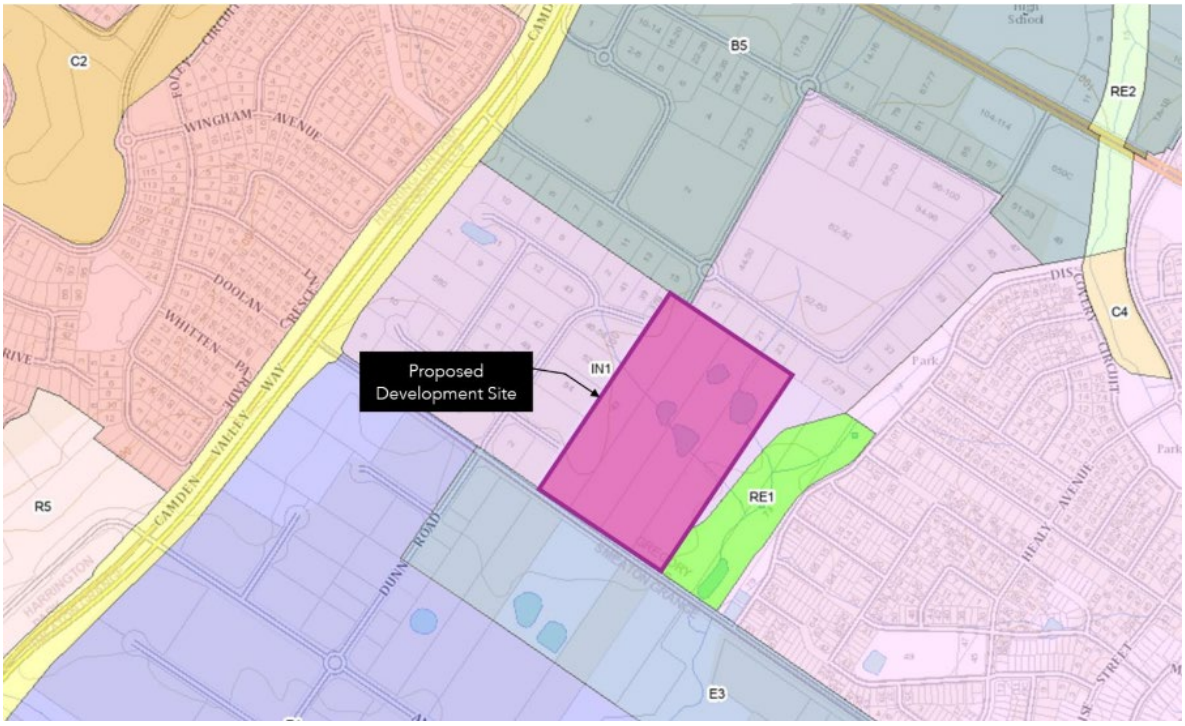


Figure 1-5: Site Overlay

1.4 Project Program

The overall Project Program is as follows:

Early Works Approved Via *DA/2024/616/1*	
Early Works	October 2025 to November 2028
Main Works Approved Via *SSD-680137154*	
Earthworks	July 2026 to October 2026
Structure and Building Envelope	August 2026 to June 2028
Internal Fit Out	January 2027 to October 2028
Commissioning	April 2028 to November 2028

1.5 Objectives

The objective of this report is to provide an appropriate Spill Management Plan that details the actions and management procedures required to protect human and environmental health from potential contamination in the event of accidental spills of chemicals and/or hazardous substances at the site.

2. Summary of Site Conditions

2.1 Site Identification

The location and current layout of the site is shown in **Figure 1-4** and **Figure 1-5** respectively, found in **Section 1**. The site details are summarised in **Table 2-1**.

Table 2-1: Summary of Site Details

Lot/Deposited Plan (DP)	Lot 14 DP28024, Lot 15 DP28024, Lot 16 DP28024, Lot 17 DP28024 and part of Lot 18 DP28024
Site Address	43, 49, 55, 61 and part of 67 Turner Road, Gregory Hills, NSW 2557
Site Area	9.3 Ha
Local Government Authority (LGA)	Camden Council *(Camden Local Environmental Plan 2010)*
Approximate Coordinates (GDA 94 Map Grid of Australia (MGA) 56)	Eastings: 293428.4 Northings: 6232414.6
Current Zoning	IN1 General Industrial and RE1 Public Recreation (partially covers Lot 18), under the State Environmental Planning Policy (SEPP) (Transport and Infrastructure) 2021
Previous Land Uses	Rural Residential and agricultural including onsite water dams
Current Land Uses	An active construction site operated by FDC

2.2 Current Site Condition

The site gently slopes towards the east, towards the unnamed watercourse which flows southeast along the eastern boundary of the site at 67 Turner Road. The site is an active construction site, with most of the site cleared of trees and topsoil. Notably, the previous onsite dams have been dewatered with surrounding soils removed. The site compound is located in the central north of the site, with a carpark situated along the northern boundary.

2.3 Proposed Chemical Storage

It is understood that various chemicals will be stored on site during the construction of the proposed development. The chemicals that are proposed to be stored on site during construction activities are detailed in **Table 2-2** below. It is noted that vehicles and refuelling tankers will be used on site and have the potential to cause spills. It is noted that as part of the proposed development, a diesel tank, a fuel pump room and fuel fill point (truck bay) has been identified shown in the design plans (**Attachment C**).

Table 2-2: Summary of Chemicals Stored Onsite

Chemical Type	Quantity	Use Onsite
Fuel (presumed to be diesel)	2,000 L stored in fuel tanks compliant with AS1940	Plant, machinery and onsite generators
Spray Paint	Up to 60 individual cans	General construction activities
Spray Can Membranes	100 L	General construction activities
Oil	100 L	Plant, machinery and onsite generators
Flocculant	1,000 L	On-site water treatment prior to discharge

3. Spill Management

3.1 Minor Spills

A minor spill can be characterised by a leak or spill of a small volume (less than 10L) of a chemical, such as those listed in **Table 2-2**, that does not pose an immediate danger to potential onsite receptors, including workers and the environment, that can be contained and cleaned up by onsite personnel.

A Spill Response Kit should be always kept onsite in a location that is easily accessible to ensure timely responses to minor spill incidents. The Principal Contractor's Site Management Plan should contain details regarding the onsite location of the Spill Response Kit. It is the responsibility of the Principal Contractor to ensure that the Spill Response Kit instructions and contents (including absorbent booms, socks, pads, broom, and personal protective equipment (PPE), are maintained throughout the main works phase of the development.

In the event of a minor spill at the site, the following procedures outlined in **Table 3-1** should be followed.

Table 3-1: Minor Spill Response Procedures

Minor Chemical Spill Response Procedures	
	Take all necessary action as soon as practicable to prevent any further release of the chemical into the environment. This may include:
☐	Activating emergency shut-off procedures to the plant, machinery or vehicle on site.
	If there appears to be an imminent risk of fire or explosion, call Emergency Services.
	Identify and mitigate any fire, explosion or vapour hazards on site. This may include:
☐	Isolating the site or parts of the site where chemical vapours are present.
☐	Erecting barricades around areas of chemical vapour to prevent access by site workers or the general public.
☐	Report the incident to the Client and raise appropriate incident reports through Procore. Ensure the Construction Manager and Environmental Point of Contact are notified of the incident. Complete the Construction Incident Workflow Procedure found here.
	Take all necessary action to prevent migration of the chemical that has leaked or spilled. This may include:
☐	Using an onsite spill kit by trained operators to prevent further spreading of surface leakage of the chemical on/off site. Ensure that onsite drainage systems are blocked off. Damming of on or off-site drains may be required to prevent migration. Local Council can assist in
☐	determining the most appropriate locations for off-site drain damming.
☐	If off site migration of the chemical is occurring, has occurred or might occur, the EPA needs to be notified, and the Emergency Services called immediately to assist with clean up.
☐	Notification of service utility providers to determine the extent of impact (if any) to any adjacent or nearby service trenches such as telephone, electricity and water.
☐	Engaging a contaminated site specialist to assist with preventing further migration of petroleum into the surrounding environment.

3.2 Major Spills

A major spill can be characterised by an uncontrolled release, leak or a spill of a large volume (more than 10L) of a chemical, such as those listed in **Table 2-2**, that poses an immediate danger to potential onsite receptors, including workers and the environment, that requires external emergency response or evacuation, or cannot be managed with a Spill Response Kit.

In the event of a major spill at the site, the following procedures outlined in **Table 3-2** should be followed.

Major Chemical Spill Response Procedures
Take all necessary action as soon as practicable to prevent any further release of the chemical into the environment. This may include:
☐ Activating emergency shut-off procedures to the plant, machinery or vehicle on site.
Once the spill is identified, the person responsible for the spill should implement an incident management procedure to remove the risk of harm to human health and the environment resulting from the leak or spill. This takes the form of several simultaneous actions:
• Take all necessary action as soon as practicable to prevent any further release of the chemical into the environment. This may include:
☐ ○ Shutting down system components, especially those responsible for the leak.
• Identify and mitigate any fire, explosion or vapour hazards on site. This may include:
☐ ○ Closing the site or parts of the site where fuel vapours are present; and
☐ ○ Erecting barricades around areas of fuel vapour to prevent access by onsite workers or the general public.
☐ ○ Report the incident to the Client and raise appropriate incident reports through Procore. Ensure the Construction Manager and Environmental Point of Contact are notified of the incident. Complete the Construction Incident Workflow Procedure found here.
If there appears to be an imminent risk of fire or explosion, then contact Emergency Services.
☐ • Take all necessary action to prevent migration of petroleum that has leaked or spilled. This may include:
☐ ○ Using a spill kit to prevent further spreading of surface leakage of petroleum on/off site, damming on-site drains to prevent migration and seeking assistance from Local Council in determining the most appropriate locations for off-site drain damming. Erecting barricades around areas of fuel vapour to prevent access by the general public;
☐ ○ If off site migration of petroleum is occurring, has occurred or might occur, Emergency Services should be called immediately to assist with clean up;
☐ ○ Notify service utility providers to determine the extent of impact (if any) to any adjacent or nearby service trenches such as telephone, gas, electricity and water; and
☐ ○ Engage a contaminated site specialist to assist with preventing further migration of the chemical into the surrounding soils and groundwater.
☐ • Take all necessary action to recover or remove petroleum that has leaked or spilled. This may include:
☐ ○ Using an onsite spill kit to soak up surface leakage of petroleum on/off site;
☐ ○ Using “sucker” or vacuum trucks to pump out any contaminated water or chemical from on / off site dammed areas, stormwater drains, or service utility trenches; and
○ Engaging a contaminated site specialist to assist with the recovery of chemicals, and the remediation of the contaminated soil and groundwater resulting from the leak or spill both within the site and off site.
Remove or, where practicable to do so, repair any leaking components of the plant or machinery in accordance with industry best practices.
☐ This may include engaging a suitably qualified person to repair or replace the leaking components of the plant or machinery. Plant and machinery should only be recommissioned once an equipment integrity test has been carried out in accordance with the written instructions of a duly qualified person and the system has been certified as having satisfied the test. A certificate should be accompanied by the test results.

Major Chemical Spill Response Procedures

Formally notify the NSW EPA

Where required, the person responsible for the plant or machinery must report the pollution incident that causes or threatens material harm to the environment to the New South Wales Environment Protection Authority (NSW EPA) under section 148 of *the Protection of the Environment Operations Act 1997* (POEO Act). A contaminated site specialist should be engaged to assist in determining whether there is a duty to report with the associated spill or leak.

A 'pollution incident' is defined by the NSW EPA as "an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises...".

'Material harm' is defined by the POEO Act as "a)harm to the environment is material if, i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $50,000 (or such other amount as is prescribed by the regulations), and b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment."

In addition, pollution incidents posing material harm to the environment should be notified to each relevant authority as defined in section 148 (8) of the POEO Act. Information required to be provided is listed in section 150 of the POEO Act, with additional information notified immediately once it becomes know.

Based on the procedures outlined in **Table 3-1** and **Table 3-2**, potential spills of chemicals at the site can be managed accordingly to ensure potential contamination risks are mitigated.

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email tbrown@jbsg.com.au.

Yours sincerely:

Reviewed/Approved by:

Emma Rodwell
Project Scientist
JBS&G Australia Pty Ltd

Torianne Brown
Senior Environmental Consultant
JBS&G Australia Pty Ltd

Matthew Bennett (CEnvP-SC)
Senior Principal
JBS&G Australia Pty Ltd

Attachments:

Attachment A Limitations

Attachment B Development Plans

Attachment A Limitations

This report has been prepared for use by the client who has commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the client and other parties. The report has been prepared specifically for the client for the purposes of the commission, and no warranties, express or implied, are offered to any third parties and no liability will be accepted for use or interpretation of this report by any third party.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose. This report should not be amended in any way without prior approval by JBS&G, or reproduced other than in full including all attachments as originally provided to the client by JBS&G.

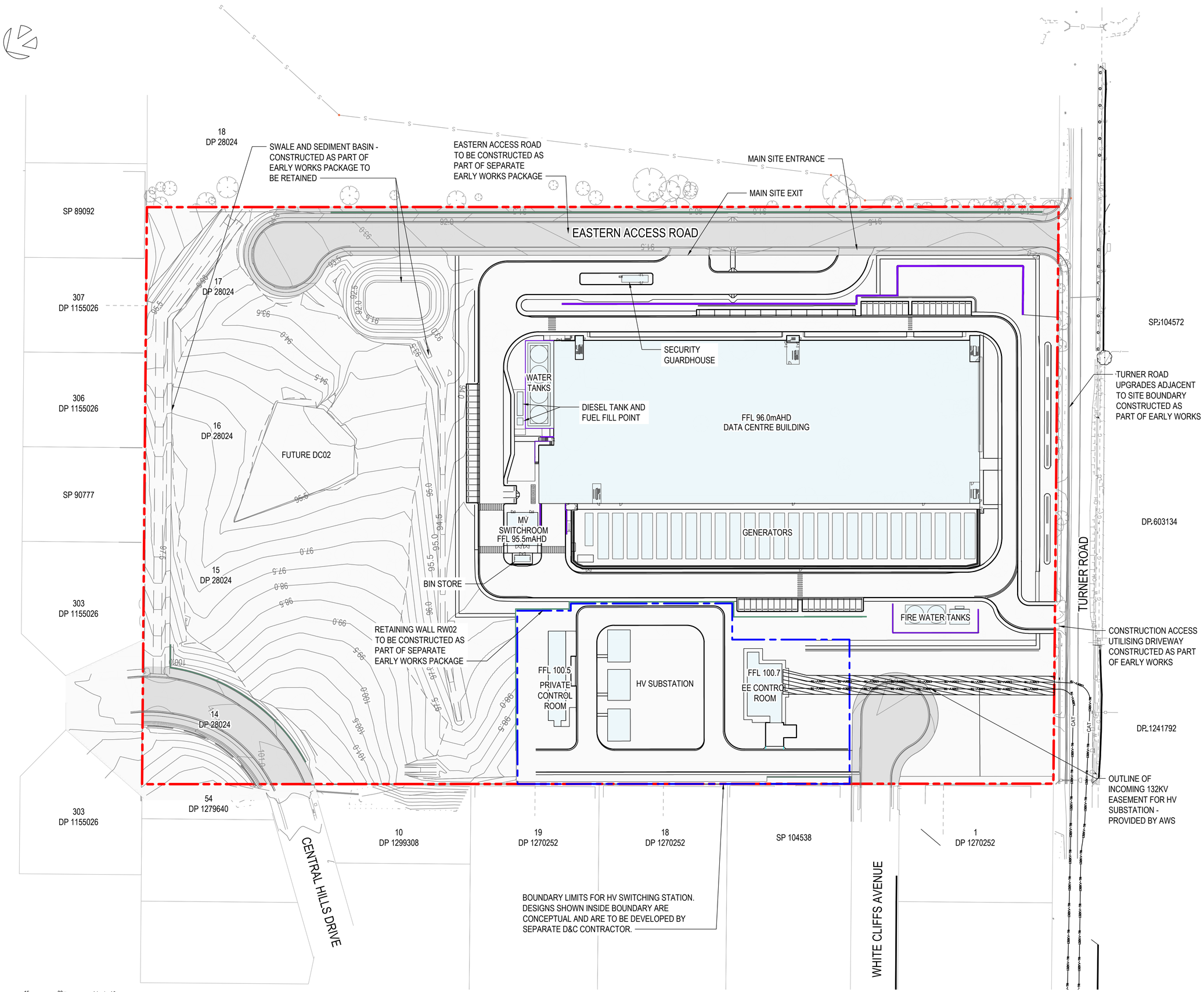
Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the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

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. 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 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 report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.

Attachment B Development Plans



0 15 30m

A1 / A3
1:750 / 1:1500

NOTES:

1. FOR GENERAL LEGEND REFER DRAWING NO. SYD091-ARP-10-01-DR-C-00003.
2. FOR GENERAL NOTES REFER DRAWING NO'S SYD091-ARP-10-01-DR-C-00005 TO C-00007.
3. FFL'S OF BUILDINGS WITHIN HV SUBSTATION ARE INDICATIVE ONLY AND ARE TO BE CONFIRMED BY THE D&C CONTRACTOR FOR THE HV SUBSTATION.

REV	DATE	DESCRIPTION	DRN	ENG	CHK	APP
A	08NOV24	SCHEMATIC DESIGN	BT	VK	EGM	NP
B	17FEB25	DESIGN DEVELOPMENT	PDA	VK	EGM	NP
C	28MAR25	DETAILED DESIGN	PDA	VK	EGM	NP
0	16APR25	CONSTRUCTION DOCUMENT	PDA	EA	EGM	NP
D	19MAY25	CONSTRUCTION DOCUMENT	PDA	EA	EGM	NP

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PROJECT:
SYD091

TITLE:
GENERAL ARRANGEMENT PLAN

DRAWING:
SYD091-ARP-10-01-DR-C-00020

PAPER SIZE:	SCALE:	AGILE NO:	REV:
ISO A1	1:750m		D

PRINT IN COLOUR

RE1 ZONE

ENSURE THAT LANDSCAPING AND GC WORKS ARE ALIGNED WITH EARLY WORKS PLANS

ACCESS ROAD

CUL-DE-SAC

15M SETBACK

SEDIMENT CONTROL BASIN,
DETAILS REF. TO CIVIL DRAWINGS

SITE EXIT

SITE ENTRY

NON-IMPACT RATED BOOM GATES

SALLY PORT EXIT

SALLY PORT ENTRY

GUARD HOUSE

PARALLEL CAR PARKING (10)

CAR PARKING (18)

WATER TANKS

FUEL TANK

FUEL PUMP ROOM

FUEL TRUCK BAY

CAR PARKING (20)

EV CHARGING

BIKE RACK SHELTER

MV SWITCHROOM

BIN STORE

LOAD BANK
4.6X2.4mX2.6mH

DC02 - FUTURE
DEVELOPMENT

REFER TO MECHANICAL DRAWING AND SPECIFICATION FOR WATER TANK LADDER

CAR PARKING (20)

FIRE PUMP ROOM

REFER TO FIRE DRAWING AND SPECIFICATION FOR FIRE TANKS LADDER

EV CHARGING

2x FIRE TANKS

SUBSTATION

TURNER ROAD
CONSTRUCTION /
EMERGENCY
ACCESS

TURNER ROAD

15M SETBACK

CENTRAL HILLS DRIVE

15M SETBACK

15M SETBACK

WHITE CLIFFS AVE

1 SITE LAYOUT PLAN
scale1 : 400

NOTES

NOT FOR CONSTRUCTION.
FOR REFERENCE ONLY.

KEYNOTES

LEGEND

- SITE BOUNDARY
- RETAINING WALL. DETAILS REF. CIVIL DRAWINGS
- 3.6m HIGH PALISADE FENCE WITH CONCRETE SIDEWORK
- 2.4m HIGH PALISADE FENCE WITH CONCRETE SIDEWORK
- 2.4m HIGH PALISADE K4 IMPACT RATED FENCE WITH CONCRETE SIDEWORK
- 2.4m HIGH PALISADE FENCE INTEGRAL WITH RETAINING WALL
- K4 IMPACT RATED BIFOLD GATES
- 2.1m CHAIN LINK FENCE WITH ANTI-CLIMB TOPPER
- ANTI-CLIMB TOPPER - INTEGRAL WITH RETAINING WALL
- PEDESTRAIN GATE & TURNSTILE
- HV SUBSTATION FENCE (INSTALLED BY OTHERS)
- WELD MESH - TEMPORARY
- DDA ROUTE

DETAILS REF. CIVIL/SECURITY DRAWINGS

CONCRETE SIDEWALK REQUIRED FOR ANTI-DIG PROTECTION

BUSHFIRE ROAD AS PER CIVIL ENGS DRAWINGS.

BUSHFIRE REPORT REQUIRMENTS TBC.

GENERATOR EXHAST LOCATION TO BE CONFIRMED
- FURTHER CFD STUDY MIGHT BE REQUIRED
- ADDITIONAL CABLE LENGTH MIGHT BE REQUIRED

THE FENCE TO BE DESIGNED AND COORDINATED BY THE FENCE CONTRACTOR.

REV	DATE	DESCRIPTION	DRN	ENG	CHK	APP
A	09NOV2024	SCHEMATIC DESIGN	IF	IF	CM	ST
B	10FEB2025	DESIGN DEVELOPMENT	IF	IF	CM	ST
C	28MAR2025	DETAILED DESIGN	IF	IF	CM	ST
D	11APR2025	CONSTRUCTION DOCUMENT	IF	IF	CM	ST
D	19MAY2025	CONSTRUCTION DOCUMENT	IF	IF	CM	ST

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OTHER CONSULTANT:

PROJECT:
SYD091

TITLE:
SITE LAYOUT PLAN

DRAWING:
SYD091-GEN-00-02-DR-A-00020

PAPER SIZE:	SCALE:	AGILE NO:	REV:
ISO A0	1 : 400		D

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