



NSW Site Auditor Scheme

Site Audit Statement

A site audit statement summarises the findings of a site audit. For full details of the site auditor’s findings, evaluations and conclusions, refer to the associated site audit report.

This form was approved under the *Contaminated Land Management Act 1997* on 12 October 2017.

For information about completing this form, go to Part IV.

Part I: Site audit identification

Site audit statement no. 0301-1613-6

This site audit is a:

- statutory audit
- non-statutory audit

within the meaning of the *Contaminated Land Management Act 1997*.

Site auditor details

(As accredited under the *Contaminated Land Management Act 1997*)

Name	James Davis		
Company	Enviroview Pty Ltd		
Address	PO Box 327		
	GLADESVILLE NSW	Postcode	2110
Phone	0467 375 481		
Email	james.davis@enviroview.com.au		

Site details

Address	Proposed Lot 23, Moorebank Precinct East,		
	Sydney Intermodal		
	400 Moorebank Ave		
	MOOREBANK	Postcode	2170

Property description

(Attach a separate list if several properties are included in the site audit.)

Part Lot 27 DP 1253673 (Proposed Lot 23 see attached plan)	
Local government area	Liverpool City Council
Area of site (include units, e.g. hectares)	20.78 Ha
Current zoning	IN1 – General Industrial (Liverpool LEP 2008)

Regulation and notification

To the best of my knowledge:

the site is the subject of a declaration, order, agreement, proposal or notice under the *Contaminated Land Management Act 1997* or the *Environmentally Hazardous Chemicals Act 1985*, as follows: (provide the no. if applicable)

- Declaration no. _____
- Order no. _____
- Proposal no. _____
- Notice no. _____

the site is not the subject of a declaration, order, proposal or notice under the *Contaminated Land Management Act 1997* or the *Environmentally Hazardous Chemicals Act 1985*.

To the best of my knowledge:

- the site **has** been notified to the EPA under section 60 of the *Contaminated Land Management Act 1997*
- the site **has not** been notified to the EPA under section 60 of the *Contaminated Land Management Act 1997*.

Site audit commissioned by

Name Michael Yiend
Company Qube Property Management Services Pty Ltd
Address 45 Clarence Street
SYDNEY Postcode 2000
Phone 9080 1900
Email Michael.Yiend@Qube.com.au

Contact details for contact person (if different from above)

Name Mark Howley – Tactical Project Management Pty Ltd
Phone 0409 869 980
Email mhowley@tacticalgroup.com.au

Nature of statutory requirements (not applicable for non-statutory audits)

- Requirements under the *Contaminated Land Management Act 1997* (e.g. management order; please specify, including date of issue)

- Requirements imposed by an environmental planning instrument (please specify, including date of issue)

- Development consent requirements under the *Environmental Planning and Assessment Act 1979* (please specify consent authority and date of issue)
Development Consent SSD 7628 determined by Planning Assessment Commission on
the 31 January 2018
- Requirements under other legislation (please specify, including date of issue)

Purpose of site audit

- A1** To determine land use suitability

Intended uses of the land: Commercial/Industrial Landuse.

OR

- A2** To determine land use suitability subject to compliance with either an active or passive environmental management plan
-

OR

(Tick all that apply)

- B1** To determine the nature and extent of contamination
 - B2** To determine the appropriateness of:
 - an investigation plan
 - a remediation plan
 - a management plan
 - B3** To determine the appropriateness of a **site testing plan** to determine if groundwater is safe and suitable for its intended use as required by the *Temporary Water Restrictions Order for the Botany Sands Groundwater Resource 2017*
 - B4** To determine the compliance with an approved:
 - voluntary management proposal** or
 - management order** under the *Contaminated Land Management Act 1997*
 - B5** To determine if the land can be made suitable for a particular use (or uses) if the site is remediated or managed in accordance with a specified plan.
-
-

Information sources for site audit

Consultancies which conducted the site investigations and/or remediation:

HLA-Envirosciences Pty Ltd, Milsearch Pty Ltd, G-tek Australia Pty Ltd, GHD Pty Ltd, JBS&G Pty Ltd, EP Risk Pty Ltd

Titles of reports reviewed:

HLA-Envirosciences Pty Ltd. *Soil and Groundwater Investigation, Precinct H (DNSDC), Moorebank Defence Land.* (Report Ref.: D0307). 8 November 2002.

Milsearch Pty Ltd. *Ordnance Investigation and Hazard Analysis of the DNSDC, Moorebank.* (Report Ref.: DNSDC UXO Surveys). 1 November 2002. (Milsearch, Nov 2002)

Site Audit Statement

G-tek Australia Pty Ltd. *Post Activity Report Hazard Reduction Precinct H, Moorebank Defence Land Moorebank NSW.* (Report Ref.: URSA03099). 27 October 2003.

HLA-Envirosciences Pty Ltd. *Contamination Investigations at Defence Integrated Distribution Systems Sites, Defence National Storage Distribution Centre (DNSDC), Moorebank, NSW.* (Report Ref.: D1045718_RPTFinal_Moorebank_Sep06). 18 September 2006.

GHD Pty Ltd. *Stage 1 Contamination Assessment and Data Gap Analysis, Defence National Storage and Distribution Centre.* (Report Ref.: 21/24133). 12 December 2014.

GHD Pty Ltd. *DNSDC Moorebank Intrusive Site Investigation Report.* (Report Ref.: 21/24133/207651). 10 September 2015.

JBS&G. *Sampling, Analysis and Quality Plan, Contamination Assessment, SIMTA Stage 2 Development, Moorebank Avenue, Moorebank, NSW.* (Report Ref.: 51432/104290 RevA). 27 June 2016.

GHD Pty Ltd. *Former DNSDC, Moorebank, NSW, Environmental Management Plan.* (Report Ref.: 21/25471/216160). 15 September 2016. (GHD, Sept 2016)

JBS&G [Andrew Lau Site Auditor]. *Site Audit Report and Site Audit Statement: 0503-1611, Part Lot 1 in DP 1048263, Former Defence National Storage and Distribution Centre (DNSDC), Moorebank Avenue, Moorebank, NSW.* (Report Ref.: 51732-104288 Rev0). 26 September 2016.

G-tek Australia Pty Ltd. *Letter Report: Condition B134 – Moorebank Precinct East – Tactical.* (Report Ref.: MPE_gg_180115). 15 January 2018.

G-tek Australia Pty Ltd. *Letter Report: CoA B133 – Moorebank Precinct East – Tactical.* (Report Ref.: MPEB133_gg_180209). 9 February 2018.

EP Risk. *Unexploded Ordnance (UXO) Management Plan for Moorebank Precinct East, Stage 2 Development Site.* (Report Ref.: v1_02). 15 February 2018.

SIMTA. *Early Works Spoil Management Plan, Moorebank Precinct East Stage 2.* (Report Ref.: MPE St2 EW-QPMS-EN-PLN-00003). 27 February 2018.

EP Risk. *Contamination Management Plan, Moorebank Precinct East Stage 2, 400 Moorebank Avenue, Moorebank NSW.* (Report Ref.: EP0716_CMP01 v5). 2 March 2018.

JBS&G. *Moorebank Precinct East (MPE) Imported Fill Records.* (Report Ref.: 54834-121150). 15 March 2019.

SIMTA. *Construction Spoil Management Plan, Moorebank Precinct East Stage 2.* (Report Ref.: MPESt2Con-QPMS-EN-PLN-00003). 23 March 2018.

EP Risk. *PFAS Groundwater Characterisation Assessment, Moorebank Precinct East Stage 2, 400 Moorebank Avenue, Moorebank, NSW.* (Report Ref.: EP0947.002 v2). 29 April 2019.

JBS&G. *Preconstruction Contamination Assessment Report, MPE Stage 2, Lot 23 Validation Report, Moorebank Avenue, Moorebank, NSW.* (Report Ref.: 54834/124976_Rev B). 16 January 2020.

Other information reviewed, including previous site audit reports and statements relating to the site:

NSW Government, Department of Planning and Environment (NSW DPE). *Development Consent for State Significant Development (SSD) 7628, Lot 1 DP 1048263, Part Lots 1, 2, and 4 DP 1197707, Moorebank Avenue.* (Report Ref.: SSD 7628). 31 January 2018.

JBS&G [Andrew Lau Site Auditor]. *Site Audit Report and Site Audit Statement: 0503-1611, Part Lot 1 in DP 1048263, Former Defence National Storage and Distribution Centre (DNSDC), Moorebank Avenue, Moorebank, NSW.* (Report Ref.: 51732-104288 Rev0). 26 September 2016.

Site audit report details

Title Site Audit Report, Proposed Lot 23, Moorebank Precinct East

Sydney Intermodal 400 Moorebank Ave Moorebank

Report no. 600099_0301-1613-6

Date: 21 July 2020

Part II: Auditor's findings

Please complete either Section A1, Section A2 or Section B, not more than one section.
(Strike out the irrelevant sections.)

- Use **Section A1** where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land uses **without the implementation** of an environmental management plan.
- Use **Section A2** where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land uses **with the implementation** of an active or passive environmental management plan.
- Use **Section B** where the audit is to determine:
 - (B1) the nature and extent of contamination, and/or
 - (B2) the appropriateness of an investigation, remediation or management plan¹, and/or
 - (B3) the appropriateness of a site testing plan in accordance with the *Temporary Water Restrictions Order for the Botany Sands Groundwater Source 2017*, and/or
 - (B4) whether the terms of the approved voluntary management proposal or management order have been complied with, and/or
 - (B5) whether the site can be made suitable for a specified land use (or uses) if the site is remediated or managed in accordance with the implementation of a specified plan.

¹ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

Section A1

I certify that, in my opinion:

The **site is suitable** for the following uses:

(Tick all appropriate uses and strike out those not applicable.)

- ~~Residential, including substantial vegetable garden and poultry~~
- ~~Residential, including substantial vegetable garden, excluding poultry~~
- ~~Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
- ~~Day care centre, preschool, primary school~~
- ~~Residential with minimal opportunity for soil access, including units~~
- ~~Secondary school~~
- ~~Park, recreational open space, playing field~~
- Commercial/industrial

Other (please specify):

OR

~~I certify that, in my opinion, the site is not suitable for any use due to the risk of harm from contamination.~~

Overall comments:

Assessment, remediation, and validation has been undertaken at the site during the site preparation phase of development that included demolition and disposal of structures, removal of redundant infrastructure and installation of new infrastructure, and alteration of land levels (site filling). The assessment, remediation, and validation works are considered to have rendered the site suitable for commercial/industrial development.

~~Section A2~~

~~I certify that, in my opinion:~~

~~Subject to compliance with the **attached** environmental management plan² (EMP), the site is suitable for the following uses:~~

~~(Tick all appropriate uses and strike out those not applicable.)~~

- ~~Residential, including substantial vegetable garden and poultry~~
- ~~Residential, including substantial vegetable garden, excluding poultry~~
- ~~Residential with accessible soil, including garden (minimal home grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
- ~~Day care centre, preschool, primary school~~
- ~~Residential with minimal opportunity for soil access, including units~~
- ~~Secondary school~~
- ~~Park, recreational open space, playing field~~
- ~~Commercial/industrial~~
- ~~Other (please specify):~~

~~EMP details~~

~~Title~~

~~_____~~

~~_____~~

~~Author~~

~~Date~~

~~EMP summary~~

~~This EMP (attached) is required to be implemented to address residual contamination on the site.~~

~~The EMP: (Tick appropriate box and strike out the other option.)~~

- ~~requires operation and/or maintenance of **active** control systems³~~
- ~~requires maintenance of **passive** control systems only³.~~

² Refer to Part IV for an explanation of an environmental management plan.

³ Refer to Part IV for definitions of active and passive control systems.

Site Audit Statement

~~Purpose of the EMP:~~

~~Description of the nature of the residual contamination:~~

~~Summary of the actions required by the EMP:~~

~~How the EMP can reasonably be made to be legally enforceable:~~

~~How there will be appropriate public notification:~~

~~Overall comments:~~

Section B

~~Purpose of the plan⁴ which is the subject of this audit:~~

~~I certify that, in my opinion:~~

~~(B1)~~

- ~~The nature and extent of the contamination has been appropriately determined~~
- ~~The nature and extent of the contamination has not been appropriately determined~~

~~AND/OR (B2)~~

- ~~The investigation, remediation or management plan is appropriate for the purpose stated above~~
- ~~The investigation, remediation or management plan is not appropriate for the purpose stated above~~

~~AND/OR (B3)~~

- ~~The site testing plan:

 - ~~is appropriate to determine~~
 - ~~is not appropriate to determine~~
 if groundwater is safe and suitable for its intended use as required by the ~~Temporary Water Restrictions Order for the Botany Sands Groundwater Resource 2017~~~~

~~AND/OR (B4)~~

- ~~The terms of the approved voluntary management proposal* or management order** (strike out as appropriate):~~
 - ~~have been complied with~~
 - ~~have not been complied with:~~
- ~~*voluntary management proposal no: _____~~
- ~~**management order no: _____~~

~~AND/OR (B5)~~

- ~~The site can be made suitable for the following uses:~~
 - ~~(Tick all appropriate uses and strike out those not applicable.)~~
 - ~~Residential, including substantial vegetable garden and poultry~~
 - ~~Residential, including substantial vegetable garden, excluding poultry~~

⁴ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

Site Audit Statement

- ~~Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
- ~~Day care centre, preschool, primary school~~
- ~~Residential with minimal opportunity for soil access, including units~~
- ~~Secondary school~~
- ~~Park, recreational open space, playing field~~
- ~~Commercial/industrial~~
- ~~Other (please specify):~~

~~IF the site is remediated/managed* in accordance with the following plan (attached):~~

~~*Strike out as appropriate~~

~~Plan title~~ _____

~~Plan author~~ _____
~~Plan date~~ _____ ~~No. of pages~~ _____

~~Plan title~~ _____

~~Plan author~~ _____
~~Plan date~~ _____ ~~No. of pages~~ _____

~~SUBJECT to compliance with the following condition(s):~~

~~Overall comments:~~

Part III: Auditor's declaration

I am accredited as a site auditor by the NSW Environment Protection Authority (EPA) under the *Contaminated Land Management Act 1997*.

Accreditation no. 0301

I certify that:

- I have completed the site audit free of any conflicts of interest as defined in the *Contaminated Land Management Act 1997*, and
- with due regard to relevant laws and guidelines, I have examined and am familiar with the reports and information referred to in Part I of this site audit, and
- on the basis of inquiries I have made of those individuals immediately responsible for making those reports and obtaining the information referred to in this statement, those reports and that information are, to the best of my knowledge, true, accurate and complete, and
- this statement is, to the best of my knowledge, true, accurate and complete.

I am aware that there are penalties under the *Contaminated Land Management Act 1997* for wilfully making false or misleading statements.



Signed

Date 21 July 2020

Part IV: Explanatory notes

To be complete, a site audit statement form must be issued with all four parts.

How to complete this form

Part I

Part I identifies the auditor, the site, the purpose of the audit and the information used by the auditor in making the site audit findings.

Part II

Part II contains the auditor's opinion of the suitability of the site for specified uses or of the appropriateness of an investigation, or remediation plan or management plan which may enable a particular use. It sets out succinct and definitive information to assist decision-making about the use or uses of the site or a plan or proposal to manage or remediate the site.

The auditor is to complete either Section A1 or Section A2 or Section B of Part II, **not** more than one section.

Section A1

In Section A1 the auditor may conclude that the land is *suitable* for a specified use or uses OR *not suitable* for any beneficial use due to the risk of harm from contamination.

By certifying that the site is *suitable*, an auditor declares that, at the time of completion of the site audit, no further investigation or remediation or management of the site was needed to render the site fit for the specified use(s). **Conditions must not be** imposed on a Section A1 site audit statement. Auditors may include **comments** which are key observations in light of the audit which are not directly related to the suitability of the site for the use(s). These observations may cover aspects relating to the broader environmental context to aid decision-making in relation to the site.

Section A2

In Section A2 the auditor may conclude that the land is *suitable* for a specified use(s) subject to a condition for implementation of an environmental management plan (EMP).

Environmental management plan

Within the context of contaminated sites management, an EMP (sometimes also called a 'site management plan') means a plan which addresses the integration of environmental mitigation and monitoring measures for soil, groundwater and/or hazardous ground gases throughout an existing or proposed land use. An EMP succinctly describes the nature and location of contamination remaining on site and states what the objectives of the plan are, how contaminants will be managed, who will be responsible for the plan's implementation and over what time frame actions specified in the plan will take place.

By certifying that the site is suitable subject to implementation of an EMP, an auditor declares that, at the time of completion of the site audit, there was sufficient information

satisfying guidelines made or approved under the *Contaminated Land Management Act 1997* (CLM Act) to determine that implementation of the EMP was feasible and would enable the specified use(s) of the site and no further investigation or remediation of the site was needed to render the site fit for the specified use(s).

Implementation of an EMP is required to ensure the site remains suitable for the specified use(s). The plan should be legally enforceable: for example, a requirement of a notice under the CLM Act or a development consent condition issued by a planning authority. There should also be appropriate public notification of the plan, e.g. on a certificate issued under s.149 of the *Environmental Planning and Assessment Act 1979*.

Active or passive control systems

Auditors must specify whether the EMP requires operation and/or maintenance of active control systems or requires maintenance of passive control systems only. Active management systems usually incorporate mechanical components and/or require monitoring and, because of this, regular maintenance and inspection are necessary. Most active management systems are applied at sites where if the systems are not implemented an unacceptable risk may occur. Passive management systems usually require minimal management and maintenance and do not usually incorporate mechanical components.

Auditor's comments

Auditors may also include **comments** which are key observations in light of the audit which are not directly related to the suitability of the site for the use(s). These observations may cover aspects relating to the broader environmental context to aid decision-making in relation to the site.

Section B

In Section B the auditor draws conclusions on the nature and extent of contamination, and/or suitability of plans relating to the investigation, remediation or management of the land, and/or the appropriateness of a site testing plan in accordance with the *Temporary Water Restrictions Order for the Botany Sands Groundwater Source 2017*, and/or whether the terms of an approved voluntary management proposal or management order made under the CLM Act have been complied with, and/or whether the site can be made suitable for a specified land use or uses if the site is remediated or managed in accordance with the implementation of a specified plan.

By certifying that a site *can be made suitable* for a use or uses if remediated or managed in accordance with a specified plan, the auditor declares that, at the time the audit was completed, there was sufficient information satisfying guidelines made or approved under the CLM Act to determine that implementation of the plan was feasible and would enable the specified use(s) of the site in the future.

For a site that *can be made suitable*, any **conditions** specified by the auditor in Section B should be limited to minor modifications or additions to the specified plan. However, if the auditor considers that further audits of the site (e.g. to validate remediation) are required, the auditor must note this as a condition in the site audit statement. The condition must not specify an individual auditor, only that further audits are required.

Auditors may also include **comments** which are observations in light of the audit which provide a more complete understanding of the environmental context to aid decision-making in relation to the site.

Part III

In **Part III** the auditor certifies their standing as an accredited auditor under the CLM Act and makes other relevant declarations.

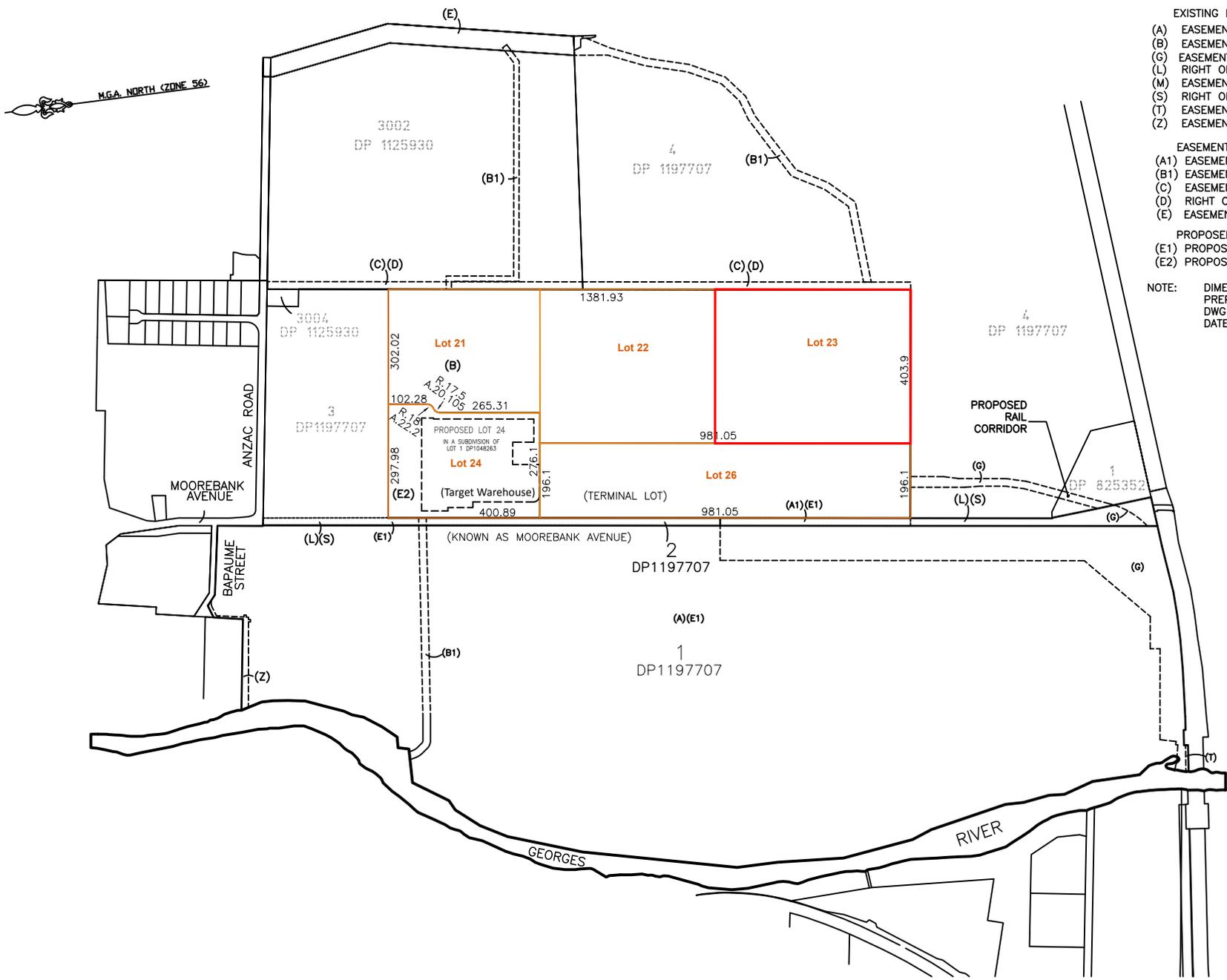
Where to send completed forms

In addition to furnishing a copy of the audit statement to the person(s) who commissioned the site audit, statutory site audit statements must be sent to

- the **NSW Environment Protection Authority**:
nswauditors@epa.nsw.gov.au or as specified by the EPA

AND

- the **local council** for the land which is the subject of the audit.



- EXISTING EASEMENT**
- (A) EASEMENT FOR ACCESS AFFECTING WHOLE OF LOT (AM123459)
 - (B) EASEMENT FOR ACCESS AFFECTING WHOLE OF LOT (AM123459)
 - (C) EASEMENT FOR RAIL CORRIDOR 15 WIDE & VARIABLE (DP1230086)
 - (L) RIGHT OF CARRIAGEWAY 20.115 WIDE & VARIABLE WIDTH (DP802712)
 - (M) EASEMENT FOR WATER SUPPLY 7.5 WIDE & VARIABLE WIDTH (DP1048263)
 - (S) RIGHT OF CARRIAGEWAY 9.5 WIDE & VARIABLE WIDTH (DP1061150)
 - (T) EASEMENT FOR HIGH TENSION TRANSMISSION LINE VARIABLE WIDTH (DP1061150)
 - (Z) EASEMENT FOR OVERHEAD POWER LINES VARIABLE WIDTH (DP1125932)
- EASEMENT UNDER AGREEMENT NOT YET CREATED**
- (A1) EASEMENT FOR SERVICES & DRAINAGE VARIABLE WIDTH
 - (B1) EASEMENT TO DRAIN WATER 20 WIDE
 - (C) EASEMENT FOR SERVICES AND DRAINAGE 20 WIDE
 - (D) RIGHT OF CARRIAGEWAY 20 WIDE
 - (E) EASEMENT TO DRAIN WATER 50 WIDE
- PROPOSED EASEMENT**
- (E1) PROPOSED EASEMENT FOR SERVICES (WHOLE OF LOT)
 - (E2) PROPOSED EASEMENT FOR SERVICES (WHOLE OF LOT)

NOTE: DIMENSIONS DERIVED FROM PLAN
 PREPARED FROM REID CAMPBELL
 DWG No 115123_A_SSD_0006
 DATED 26-6-2018

- Site Audit Site Boundary
- Proposed Subdivision



Adapted from Land Partners Plan of Stage 1 Subdivision for Moorebank Intermodal, Plan Number SY073909.000Sheet3 and JBS&G Figure Audit Boundaries Job Number 54834 Figure 1



Site Plan - Site Audit Statement 0301-1613-6
 Proposed Lot 23 - Moorebank Precinct East
 Sydney Intermodal Moorebank Ave, MOOREBANK NSW

SAS Figure
 Date: 21 July 2020
 Enviroview Pty Ltd
 Proj: 600099_0301-1613-6