

3 August 2020

Ref: IA 0301-1613_36

Mark Howley
Tactical Group
Level 15, 124 Walker Street
NORTH SYDNEY NSW 2060

Via email/Aconex: mhowley@tacticalgroup.com.au

Dear Mr Howley,

RE: Site Audit Interim Advice 36 – Review of *Final* Contamination Management Plan (CMP) for Moorebank Precinct West.

James Davis of Enviroview Pty Ltd has been engaged to provide the services of a NSW EPA Contaminated Land Accredited Site Auditor, to conduct a Site Audit in relation to the land to be developed for the Moorebank Intermodal Terminal located at Moorebank Avenue, Moorebank, NSW, in accordance with the *Contaminated Land Management Act 1997* and relevant guidelines made or approved under s.105 of that Act.

The objective of the Site Audit is to provide a Site Audit Report and Site Audit Statement to certify, in relation to contaminated land, the Auditor's opinion of whether the site is suitable for the proposed commercial/industrial development.

A Site Audit Interim Advice is provided by a Site Auditor to assist in the management of contamination issues in regard to the requirements of the Site Audit at a particular stage of the Site Audit, prior to issuing the Site Audit Statement. An interim advice does not constitute a Site Audit Statement or a Site Audit Report and does not pre-empt the final Site Audit conclusions. A Site Audit Report and Site Audit Statement will be prepared at the conclusion of the Site Audit.

The purpose of this interim advice is to provide comment with regard to the review of the following revised report:

EP Risk. *Contamination Management Plan, Moorebank Precinct West, 400 Moorebank Avenue, Moorebank, NSW.* (Report ref.: EP1489.002_MPW_CMP v11). 30 July 2020. [The 'CMP'].

The auditor has previously reviewed prior drafts of the CMP as documented in Interim Advice # 32, dated 5th March 2020, Interim Advice # 34 dated 3rd June 2020, and Interim Advice # 35 dated 28th July 2020.

Audit Opinion – Contamination Management Plan (v11, 30 July 2020, EP Risk)

The Site Auditor has reviewed the final (v11) version of the Contamination Management Plan (EP Risk, July 2020) and finds that it has sufficiently incorporated prior audit review comments.

It is noted that the CMP includes some management procedures for soils contaminated with PFAS in the areas where the OSD basins and/or drains are located – and where vegetation removal may be required under the CMP. The auditor would prefer to see additional controls in these in these areas, however, further revisions to the CMP in this regard are not considered warranted as the Long-Term Environmental Management Plan (LTEMP) will cover management of soils in this area and is expected to provide more specific management procedures for PFAS.

The Site Auditor has reviewed the Remediation Action Plan (RAP) (Golder, Aug 2016), the Remediation Validation Report (JBS&G, July 2020), the draft LTEMP¹ (currently undergoing further consultant revisions), and various supporting documents in the course of the audit.

The Remediation Validation Report satisfactorily documents the remediation and validation of contamination at the site, as defined in the RAP, that could be addressed under the development consent SSD 5066 (Phase 1 Early Works).

The CMP identifies the residual contamination that was defined in either the RAP (Golder, Aug 2016) or the Validation Report (JBS&G, July 2020) that will be remediated during the Phase 2 Works under development consent SSD 7709 following vegetation clearance within the Endangered Ecological Communities (EECs). Implementation of remedial works defined in the CMP will complete the implementation of all remedial works defined in the RAP.

It is noted the Golder RAP did not address PFAS contamination and this will be addressed in the LTEMP, and if required, a separate Remediation Action Plan.

In consideration of the above, the CMP is considered suitable to complete the remediation requirements identified in the Remediation Action Plan (Golder, Aug 2016) and guide the vegetation clearance within the EECs required to complete the remediation.

Thank you for your time regarding this matter. If you require additional information or clarification, please do not hesitate to contact me.

Yours sincerely



James Davis
NSW EPA Contaminated Land Site Auditor
Enviroview Pty Ltd

¹ EP Risk. *Long-Term Environmental Management Plan, Moorebank Precinct*. (Report ref.: EP1489.001_MPW_LTEMP_v4). 18 June 2020. [The 'LTEMP'].