

9 December 2022

Cheryl Cahill
Environment Lead
Major Projects
Sydney Water

Via email: CHERYL.CAHILL@sydneywater.com.au

L02 Interim Audit Advice (0503-2307-02) – Sydney Water Corporation – Upper South Creek Advanced Water Recycling Centre – Unexpected Finds Protocol

Dear Cheryl,

1. Introduction and Background

Andrew Lau of JBS&G Australia Pty Ltd (JBS&G), has been engaged by Sydney Water Corporation (SWC, the client) to conduct a site audit(s) related to the Upper South Creek Advanced Water Recycling Centre (USC AWRC) and associated pipelines. The USC AWRC is located at Clifton Avenue, Kemps Creek and the site is identified as Lot 211 DP1272676, Part of Lot 21 DP 258414 and Part of Lot 104 DP1271336. The USC AWRC occupies an area of approx. 78 ha.

The pipelines occupy lands between the USC AWRC and Lansdowne Reserve in Lansdowne for approx. 24 km (“the brine pipeline”) and land between the USC AWRC and the Nepean River in Wallacia for approx. 16.7 km (“the treated water pipeline”).

The USC AWRC site is owned by SWC and is zoned RU2 Rural Landscape and ENZ Environment and Recreation. The pipeline land is variously zoned as shown:

- Brine pipeline: RU2, RU4, ENZ, Western Sydney Parklands, RE1, R3, R1, SP2, R4 and B5.
- Treated pipeline: ENZ, ENT, AGB, RU1, RU5, SP2.

SWC received Ministerial approval for the USC AWRC project on 28th November 2022 as a state significant infrastructure project (Application Number SSI-8609189) (“the consent”).

2. Document Reviewed

The following document was reviewed/referred to as part of preparation of this Interim Audit Advice (IAA):

- *Unexpected Finds Procedure for Contamination*, John Holland, issued 07/12/2022, document number USCP-POL-G-002 (“the UFP”) (**Attachment 2**).

3. Objective of this Interim Advice

The objective of this interim advice is to review the suitability of the Unexpected Finds Protocol developed for the works at the site and provide audit opinions on the appropriateness of the UFP. This is required under Conditions C8(g), E74(f) and E88 of the consent and these are listed in the UFP.

4. Unexpected Finds Procedure

The auditor has reviewed the unexpected finds procedure and his assessment is shown in **Table 1**.

Table 1 – Audit review of the Unexpected Finds Procedure

Element	UFP	Audit Comment
Communications and Training	All personnel will be inducted to the site and receive on-going training via toolbox talks and pre-start meetings. Content for induction, training and awareness material to be developed by John Holland Environment Manager.	Adequate
Procedure	Observations of soil/ground during excavation work. Document in site diary records, soil during excavations for any indicators of contamination. The UFP provides a list of indicators as follows: <ul style="list-style-type: none"> • Fibre cement or other asbestos containing materials • Discolouration of the soil including staining • Odorous soil or groundwater (including seepage) • Buried chemical drums or containers • Brightly or unusually coloured material • Tar-like or ashy material 	Adequate.
	Assessment: If contamination is observed the UFP requires the following: <ul style="list-style-type: none"> • Work to stop and area kept clear. Establishment of a no-go zone. • Construction team to cover, bund or contain the contaminated material. • Provide information to Environment Team: location, visual appearance, odour, depth, surrounding material and mode of discovery, containment method. The environment team is identified as: <ul style="list-style-type: none"> • JH Construction Manager/Environment Manager. • Contamination Consultant • EPA Accredited Site Auditor (as required) • SWC Environment Lead. 	Adequate
	Management and implementation strategy. The environment team will develop and implement a plan for the management and remediation of the find, including: <ul style="list-style-type: none"> • Waste classification • Obtain further approvals as required • Ensure disposal occurs at a facility licenced to accept the contaminated waste. • Maintain records If necessary, additional monitoring will be performed. Contaminated material will be removed and validated or left in situ and managed in accordance with an agreed plan.	Records should be kept of additional monitoring for inclusion in a Validation Report.
	Works can continue when the area is safe, remediated or where works will not exacerbate contamination or hinder future remediation work.	Adequate

5. Audit Opinions

Based on a review of the information provided and subject to the limitations in **Attachment 1**, the following audit opinions are presented:

1. The UFP is appropriate.

2. The UFP should be applied to all environmental media.
3. As part of ongoing environmental management protocols, periodic review of the Unexpected Finds Procedure should be undertaken to include any learnings/understanding that arise during the project.
4. Records should be kept of additional monitoring for inclusion in a Validation Report.

Please note that this interim advice does not constitute a Site Audit Statement or a Site Audit Report but is provided to assist in the assessment and management of contamination issues at the site in regard to requirements of the site audit. The information provided herein should not be considered pre-emptive of the final audit conclusions, but rather represent the findings of the audit based on a preliminary review of available site information. Furthermore, the interim advice should not be regarded as approval of any proposed investigations or remedial activities, as any such approval is beyond the scope of an independent auditor.

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

Yours sincerely:



Andrew Lau
NSW EPA Accredited Site Auditor
Accreditation Number 0503
JBS&G Australia Pty Ltd

Attachments (1) Limitations
 (2) Unexpected Finds Proceedure

Attachment 1 – Limitations

This audit was conducted with a reasonable level of scrutiny, care and diligence on behalf of the client for the purposes outlined in s.47 (1) of the *Contaminated Land Management Act 1997*. The data used to support the conclusions reached in this audit were obtained by other consultants and the limitations which apply to the consultant's report(s) apply equally to this audit report.

Every reasonable effort has been made to identify and obtain all relevant data, reports and other information that provide evidence about the condition of the site, and those that were held by the client and the client's consultants, or that were readily available. No liability can be accepted for unreported omissions, alterations or errors in the data collected and presented by other consultants. Accordingly, the data and information presented by others are taken and interpreted in good faith.

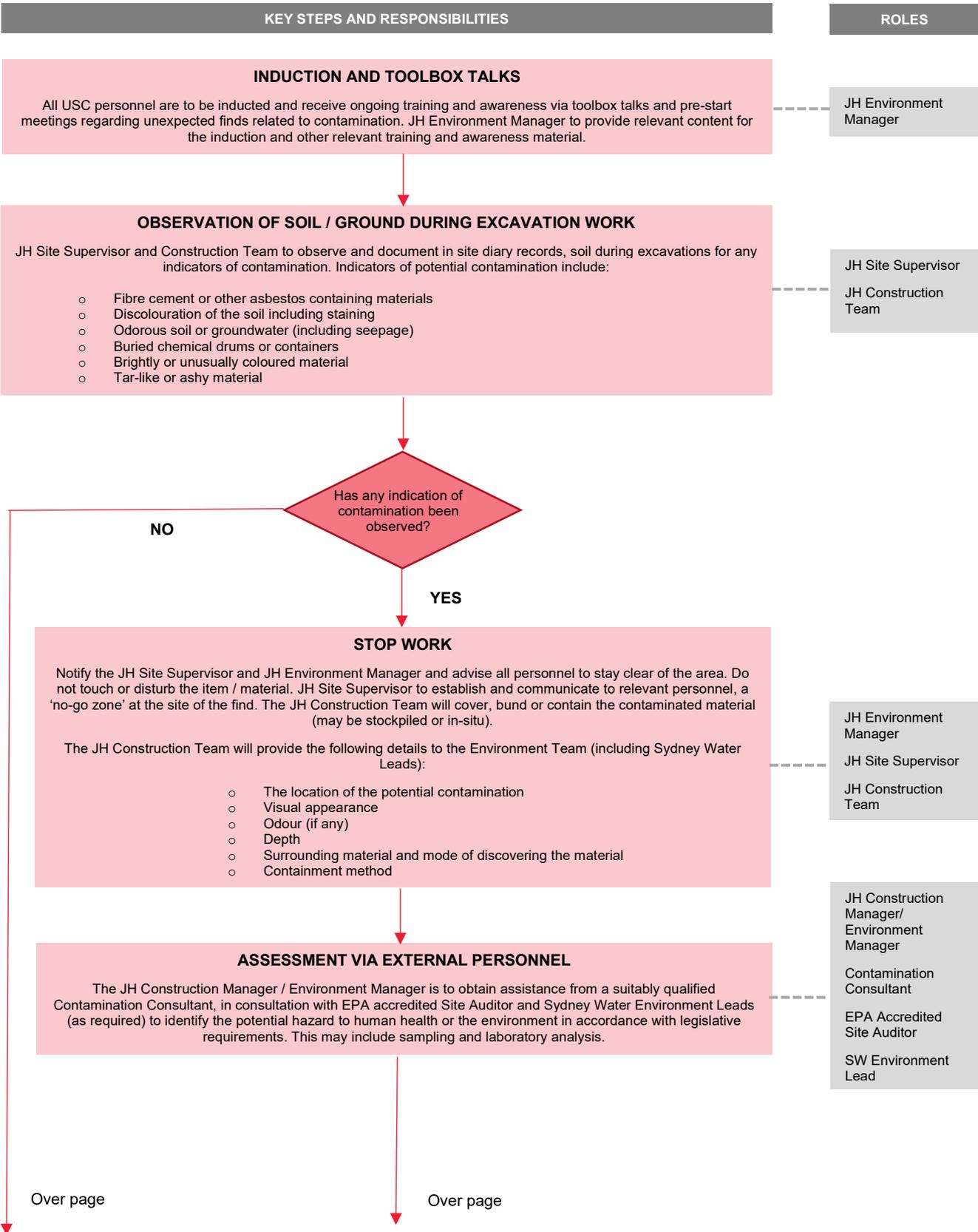
Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements. Limited sampling and laboratory analyses were undertaken as part of the investigations reviewed, as described herein. Ground 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 subsurface 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 audit are based on the information obtained at the time of the investigations.

Attachment 2 – Unexpected Finds Procedure

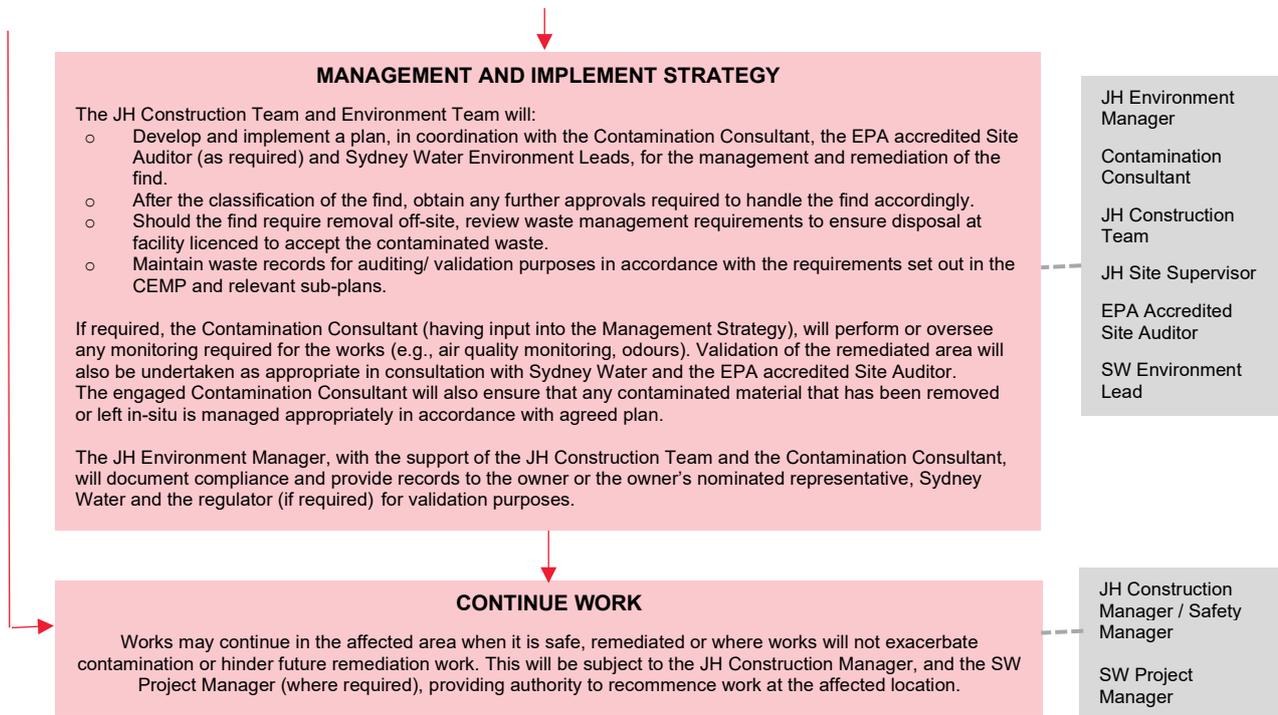
Unexpected Finds Procedure for Contamination

Scope: This Procedure has been prepared in accordance with Environmental Planning and Assessment Act 1979 (EP&A Act), Protection of the Environment Operations Act 1997 and the Contaminated Land Management Act 1997 (CLM Act) for the management of unexpected contamination finds on the Upper South Creek Advanced Water Recycling Centre Project (USC).



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Table 1: Relevant Conditions of Approval

Condition	Condition Requirement	How Addressed
C8 (g)	Measures to detail unexpected finds consistent with the Unexpected Finds Procedure for Contamination required under Condition E88. The procedure must include details of who will be responsible for implementing the Unexpected Finds Procedure for Contamination and the roles and responsibilities of all parties involved.	In accordance with MCoA C4(b), a project-specific Soils & Contamination CEMP sub-plan will be developed and implemented for the duration of the project. As required by MCoA C8(g) the sub-plan will include detail around the project's approach to unexpected contamination finds and will be consistent with the Unexpected Finds Procedure for Contamination required under MCoA E88.
E74 (f)	A NSW EPA accredited Site Auditor(s) must be engaged before the commencement of contamination investigations until the completion of construction to ensure that any Work required in relation to contamination is appropriately managed. The Site Auditor is to be provided with all documentation relevant to the consideration of contamination risk and the management of contamination for the project, including previous site audits and site audit statements. The Site Auditor is to review all relevant documentation and provide a written opinion on the contamination risk and the appropriateness of the reports and any proposed management measures of the site, including (but not limited to): <ul style="list-style-type: none"> Unexpected Finds Procedure for Contamination in Condition E88. 	SW has engaged an EPA Accredited Site Auditor (Andrew Lau, JBS&G). This procedure has been provided to the Site Auditor for review prior to issuing to the Planning Secretary in accordance with MCoA E88. Evidence of this review will be provided to DPE.
E88	An Unexpected Finds Procedure for Contamination must be prepared before the commencement of Work and must be followed should unexpected contamination or asbestos (or suspected contamination) be excavated or otherwise discovered. The procedure must include details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved. The Procedure must be reviewed by the Site Auditor and interim audit advice or a Section B Site Audit Statement provided certifying that the Unexpected Finds Procedure is appropriate. The Unexpected Finds Procedure must be submitted to the Planning Secretary for approval at least one month prior to the commencement of Work and a copy of the interim audit advice or Section B Site Audit Statement attached. The Unexpected Finds Procedure for Contamination must be implemented throughout Work.	This document is the Upper South Creek Unexpected Finds Procedure for Contamination and specifically addresses the requirements of MCoA E88. This procedure has been provided to the Site Auditor for review prior to issuing to the Planning Secretary for approval at least one month prior to commencement of work. This procedure will form part of the CEMP and sub-plans for implementation throughout the Work.