

M6 Motorway Stage 1
Level 7, Building B, 197 – 201 Coward Street
MASCOT NSW 2020

Attention: Craig Gibson - Environmental Manager
(email: Craig.Gibson@M6Stage1.com.au)

10/02/2022

SA299_220210_IAA_006
SA299

Dear Craig

**INTERIM AUDIT ADVICE 006 FOR STATUTORY SITE AUDIT No. 299 BY DR IAN SWANE,
REVIEW OF RAP FOR PRINCES HIGHWAY CAF C6 (2 pages)**

This report provides the M6 Motorway Stage 1 (**M6S1**) Project with interim audit advice (**IAA**) as part of Statutory Site Audit No. 299 being undertaken by Dr Ian Swane, a NSW Environment Protection Authority (**EPA**) Site Auditor accredited under the Contaminated Land Management (**CLM**) Act. The advice forms part of a statutory site audit for the M6S1 Project.

The purpose of this IAA is to provide a review of the revised draft document dated 8/02/22 prepared by Tetra Tech Coffey (**TTC**) titled "*M6 Motorway Stage 1, Remedial Action Plan, Princes Highway Construction Ancillary Facility (C6)*" (the **RAP**), and to:

- Assess the ability of the proposed remediation strategy to protect human health and the environment;
- Assess its compliance with EPA guidance;
- Provide advice on matters that need to be addressed in a final version the RAP; and
- Comply with Condition E112 in the Planning Approval for the M6M1 Project¹.

An earlier version of the RAP dated 22/12/21 was prepared by TTC for the Construction Ancillary Facility (**CAF C6**) site.

This interim advice is considered to be consistent with EPA guidelines and policy and does not pre-empt conclusions to be drawn at the end of the site audit process. This interim advice does not represent a site audit statement (**SAS**) or a site audit report (**SAR**). It is intended that a SAS / SAR will be prepared for CAF C6 towards the end of the M6S1 Project.

The Site Auditor has reviewed the revised RAP and considers it generally meets EPA guidance and addresses all critical review comments provided by the Site Auditor in an earlier IAA 004 dated 18/01/22. Some data gaps remain in the RAP, but the Site Auditor considers they do not influence the proposed remediation approach and can be addressed in the site remediation and validation report (**SRVR**).

Some minor typographical / report layout errors also remain in the RAP², which are not considered to influence the purpose of the RAP and can be addressed when the final version is issued. The Site Auditor considers that further IAA on the RAP will only be required if changes are made to the remediation / validation strategy, in which case any such change to the RAP will need to be approved by the Site Auditor in writing prior to the change being implemented.

¹ NSW Department of Planning (18 December 2019) Infrastructure Approval under Section 5.19 of the EP&A act 1979, State Significant Infrastructure Project No. SSI 8931, 72 pages

² Put Section 7 on a new page; remove the reference to the Killara Inn Hotel in Section 12.2

10/02/2022

IAN SWANE & ASSOCIATES P/L

The Site Auditor approves the RAP and recommends that a final version is prepared and copies distributed to all relevant stakeholders, which need to include among others, the EPA and the Site Auditor.

It is understood that the RAP will be submitted to the EPA and form the basis for a Voluntary Management Proposal (**VMP**) required by Declaration No. 20211101 dated 7/07/21 (the **Declaration**). The RAP will need to incorporate any additional requirements specified by the EPA to remove the Declaration.

The Site Auditor requests the M6S1 Project Team provide the Site Auditor with:

- A copy of the EPA's approval of the VMP without delay after it has been issued, together with any other correspondence issued by the EPA relevant to how the CAF C6 site is to be remediated and the Declaration lifted;
- A timeline for the remediation and validation of the site so the Site Auditor can plan site inspections and the review of documentation;
- Advice as to when the Site Auditor can inspect the site after the UPSS infrastructure has been removed and prior to backfilling of any excavations; and
- Notifications of any Unexpected Finds, which will need to be made without delay.

Yours sincerely



Dr Ian C Swane (CPEng, CEnvP & CSCS)

Accredited EPA Site Auditor

Director, Ian Swane & Associates

Phone: 0418 867 112

Email: iswane@bigpond.com