

10 July, 2019

Mr Chris Ritchie
Director
Industry Assessments
Department of Planning & Environment
320 Pitt Street
Sydney, 2000

Dear Chris

Major Project Approval MP 09_0147, Orica Villawood Remediation – Lot 1 DP 634604 - Modification under S. 4.55 1(a) – Addition of a new Condition of Approval as Requested by EPA Accredited Site Auditor

Please find attached a proposed Modification (Mod. 3) to MP 09_0147, under S.4.55 1(a) to add one additional Condition of Approval, as requested by the NSW EPA Accredited Site Auditor.

Proposed Modification

The Orica Villawood Remediation Project Approval applies to land identified as 2 Christina Road, Villawood (Lot 1 DP 634604).

Remediation works at the site have been completed in accordance with the Approval and Condition 7 of Schedule 4 of the Consent then requires that a Site Audit Statement(s) be issued at the completion of all works to the EPA and the Director General.

This modification (Mod. 3) therefore, comes at the request of the EPA Accredited Site Auditor, Mr Chris Jewell, to allow the final issuance of the Site Audit Statement per Condition 7 in Schedule 4.

Mr Jewell has indicated that the SAS and the accompanying Environmental Management Plan (EMP) are required to have an enforcement mechanism, usually applied through a condition of Consent.

Mr Jewell has been an Auditor on a number of Orica projects and made a similar request in relation to the Orica Southlands Project at Banksmeadow. In that case the Consent was similarly modified to include a Condition providing the enforcement mechanism.

Mr Jewel has therefore used the Southlands Consent Condition as a basis for the following recommended Condition, which we propose would be inserted in the Consent as a new Condition 7A in Schedule 4.



The Proponent shall prepare and submit a Long Term Site Environmental Management Plan (LTSEMP), to the satisfaction of the Site Auditor. The LTSEMP shall be prepared in accordance with the requirements outlined in Section 3.4.6 of the NSW EPA Contaminated Sites: Guidelines for the NSW Site Auditor Scheme (3rd edition), October 2017. The plan shall be designed to ensure activities which could potentially or directly result in exposure of future land users to residual contamination remaining on site are precluded or limited / controlled. The plan shall include:

- a) a description of the nature and location of contamination remaining on Site;*
- b) the objectives of the LTSEMP;*
- c) procedures for residual contamination management;*
- d) responsibilities for the LTSEMP implementation; and*
- e) an implementation schedule for each action in the LTSEMP.*

The site shall be maintained and all activities on the site conducted in accordance with the auditor approved LTSEMP, for the duration of the site occupation and operation, as required by the site audit statement.

We therefore seek the support of the Department to the addition of the Condition as proposed by Mr Jewell.

The proposed additional Condition does not make any material changes to the current Approval and simply meets the needs of the EPA Accredited Auditor. Therefore, we do not see that the amendment will result in any change in the environmental impacts.

We trust this Modification meets with the Department's approval. Should you require any additional information please do not hesitate to contact the undersigned.

Yours faithfully
DBL Property Pty Limited

Jeffrey Lord
Director

Cc. Mr Chis Jewell – EPA Accredited Auditor