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. MP162

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:	Melissa Porter	
Company:	Senversa Pty Ltd	
Address:	Level 24	
	1 Market Street, Sydney NSW	Postcode: 2000
Phone:	02 8252 0000	
Email:	Melissa.Porter@senversa.com.au	

Site details

Address 2 Forrester Road, St Mary's NSW

Postcode 2760

Property description

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

Part Lot 2 DP876781

Part Lot 3 DP876781

Local government area: Penrith City Council

Area of site (include units, e.g. hectares): Survey of audit areas attached.

PAEC1 and roadway – 1,320 m^2

Containment Cell 1 - 200 m^2

Containment Cell 2 - 1,000 m^2

Current zoning IN1 - General Industrial

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 Guy Evans, on behalf of Pacific National Pty Ltd

Company Urbanco

Address Suite 3.03, 55 Miller Street

Pyrmont NSW Postcode 2009

Phone 0477 474 091

Email guy.evans@urbanco.com.au

Contact details for contact person (if different from above)

~~Name~~

~~Phone~~

~~Email~~

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 7308 issued on 7/5/2020, and subsequent approved modifications) granted by the Minister for Planning and Public Spaces

☐ ~~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:

OR

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

Intended uses of the land: St Mary's Intermodal (road and rail) Terminal and Container Park as per attached development plans. Individual audit areas comprise a private sealed roadway and portion of adjacent roadway verge (PAEC1 and adjoining road area), sealed bitumen carpark (Containment Cell 1), and sealed bitumen proposed Empty Container Park area (Containment Cell 2).

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.

Intended uses of the land:

Information sources for site audit

Consultancies which conducted the site investigations and/or remediation:

Douglas Partners Pty Ltd (DP), EnviroScience Solutions (EnviroScience), Harwood Environmental Consultants (HEC).

Titles of reports reviewed:

- 'Preliminary Site Contamination Investigation, Proposed St Marys Freight Hub – 2 Forrester Road, St Mary's, NSW', 1 March 2019, prepared by DP.
- 'Supplementary Contamination Assessment, Proposed St Marys Freight Terminal – Lot 2 Forrester Road, St Mary's, NSW', 17 April 2019, prepared by DP.
- 'Further Asbestos Investigation St Mary's Intermodal Freight Terminal, Lot 2 Forrester Road, St Mary's, NSW', 27 June 2019, prepared by DP.
- 'Remediation Action Plan, Stage 1 – St Mary's Intermodal Freight Terminal, Lot 2 Forrester Road, St Mary's, NSW', 9 October 2020, prepared by DP.
- 'Remedial Works Plan Asbestos Impacted Fill (PAEC1) and Stockpile SP4 Management - Draft', 15 April 2021 prepared by EnviroScience.
- 'Sampling Analysis and Quality Plan, St Marys Intermodal', 24 May 2021 prepared by Harwood Environmental Consultants (HEC).
- 'Validation Report St Marys Intermodal', 11 November 2021 prepared by HEC.
- 'Long Term Environmental Management Plan', 11 November 2021 prepared by HEC.

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

- 'Phase 1 Environmental Site Assessment 55-67 and 69-81 Lee Holm Drive, St Marys', April 2005, prepared by ERM.
- 'Draft Validation Report 55-67 and 69-81 Lee Holm Drive, St Marys', December 2005, prepared by ERM.

The reports were considered for context and background information, and it is noted that no remediation-validation work was reported to have been undertaken within the site audit areas.

Site audit report details

Title Site Audit Report - St Mary's International Freight Terminal, 2 Forrester Road, St Mary's, NSW

Report no. MP 162 (Senversa Ref: 18100) Date 12 November 2021

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 plan[1], 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:

_____

_____

_____

_____

_____

_____

Section A2

I certify that, in my opinion:

Subject to compliance with the **attached** environmental management plan[2] (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):

St Mary's Intermodal Freight Terminal as per attached development plan.

EMP details

Title Long Term Environmental Management Plan – St Marys Intermodal Facility, 2 Forrester Road, St Marys NSW.

Author HEC

Date 12 November 2021 No. of pages 30

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 systems~~[3]

☑ requires maintenance of **passive** control systems only[3].

[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.

Purpose of the EMP:
The main objective of the plan is to ensure the site remains suitable for the proposed future land use as sections of the St Mary's Intermodal Freight Terminal.

Description of the nature of the residual contamination:

Asbestos impacted fill is located below capping layers in a roadside verge area and within two designated on-site containment cells.

Summary of the actions required by the EMP:

In the event that the barrier system is disturbed due to planned or unplanned activities, the procedures documented in the LTEMP are required to be implemented to repair the barrier such that there continues to be an effective barrier between the contaminated soil and future site users during day-to-day use. There is a requirement for an annual inspection of the capped areas by the Site Manager.

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

The LTEMP will be attached to the Site Audit Statement (SAS) and will be provided to the Planning Authority (Department of Planning, Industry and Environment) and Council.

The LTEMP could be made legally enforceable via a condition of the development consent via attachment to this SAS issued to address the development consent. Through provision of the SAS, to which the LTEMP is attached, appropriate notation will also be made on future planning certificates to provide notification to parties of the ongoing applicability of the management measured outlined in the LTEMP.

How there will be appropriate public notification:

The LTEMP will be attached to the SAS and will be provided to the Planning Authority as per Development Consent (SSD 7308) conditions. A copy will also be provided to Council. Appropriate notation on future planning certificates issued under s.10.7(2) of the Environmental Planning and Assessment Act can be made to provide notification to parties.

Overall comments:

Asbestos impacted fill remains below a validated capping system with long term management requirements outlined in the LTEMP.

Section B

Purpose of the plan[4] 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.

- ☐ 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

SUBJECT to compliance with the following condition(s):

Overall comments:

Part III: Auditor's declaration

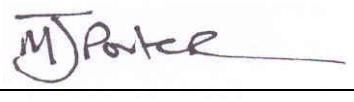
I am accredited as a site auditor by the NSW Environment Protection Authority (EPA) under the *Contaminated Land Management Act 1997.*

Accreditation no.

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 12 November 2021

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

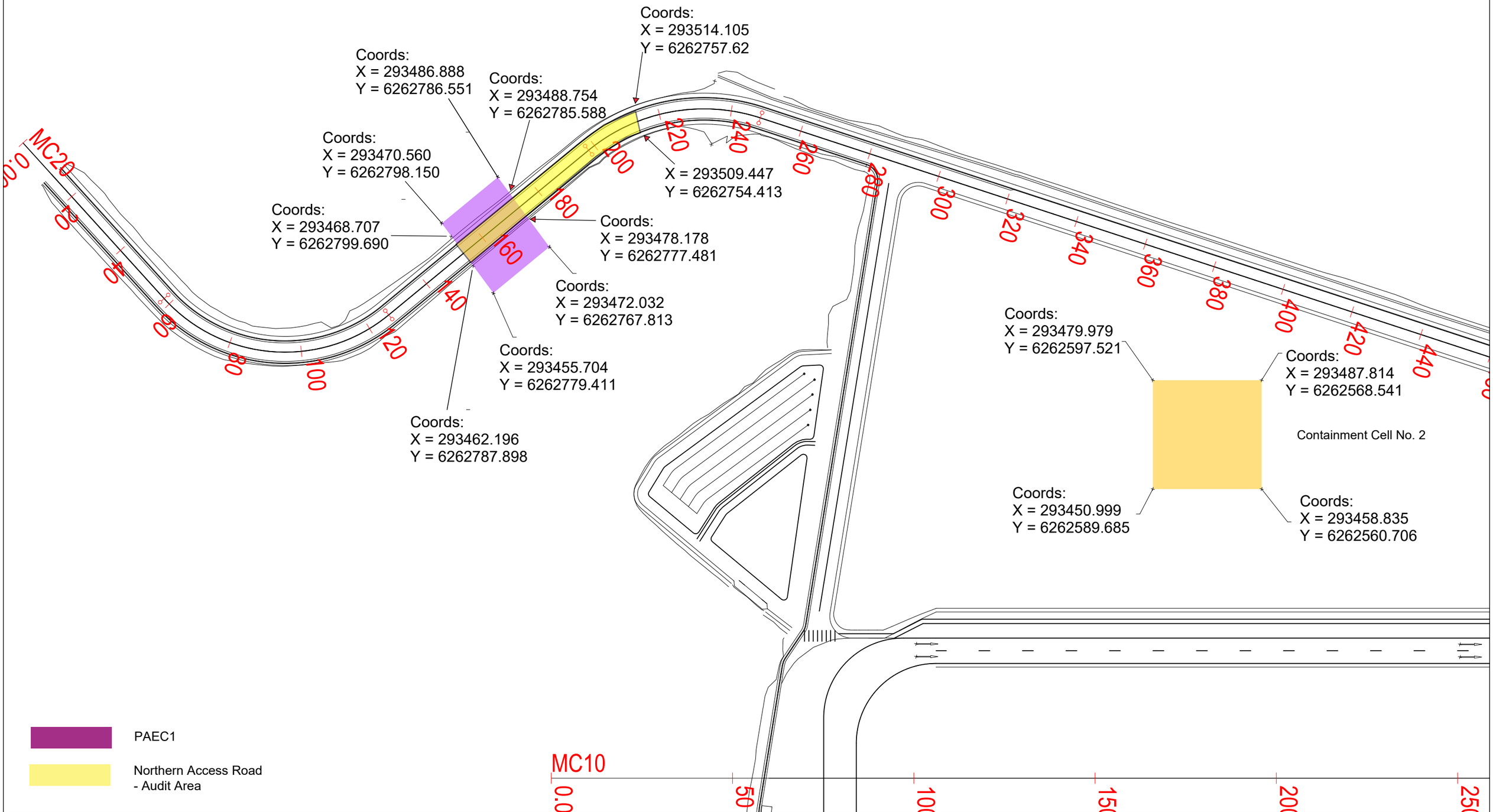
In **Part III** the auditor certifies their standing as an accredited auditor under the CLM Act and makes other relevant declarations.

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.



McMahon Services - ST Marys Rail Hub

LV Access Road Box Out

12d Model

Scale 1:1000

Mon Jun 28 13:42:47 2021

Coords:
X = 293479.979
Y = 6262597.521

Coords:
X = 293487.814
Y = 6262568.541

Containment Cell No. 2

Coords:
X = 293450.999
Y = 6262589.685

Coords:
X = 293458.835
Y = 6262560.706

Coords:
X = 293507.567
Y = 6262441.658

Containment Cell No. 1

Coords:
X = 293506.511
Y = 6262421.686

Coords:
X = 293497.581
Y = 6262442.186

Coords:
X = 293496.525
Y = 6262422.214

50 100 150 200 250 300 350 400

McMahon Services - ST Marys Rail Hub
Containment Cells 1 & 2

12d Model
Scale 1:1000
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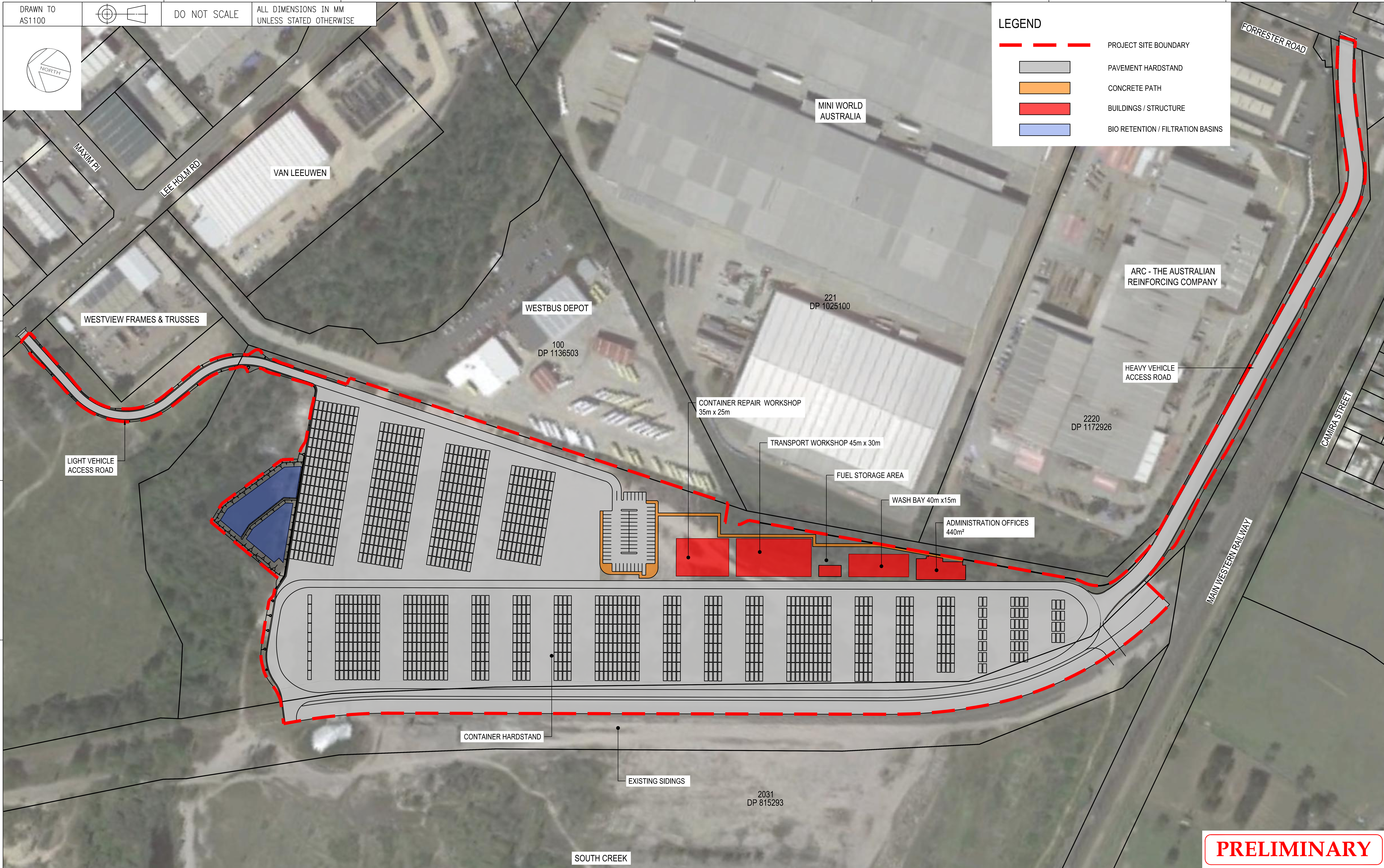
DRAWN TO AS1100

DO NOT SCALE

ALL DIMENSIONS IN MM UNLESS STATED OTHERWISE


NORTH
LEGEND
PROJECT SITE BOUNDARY
PAVEMENT HARDSTAND
CONCRETE PATH
BUILDINGS / STRUCTURE
BIO RETENTION / FILTRATION BASINS
MAXIM PL
LEE HOLM RD
VAN LEEUWEN
MINI WORLD AUSTRALIA
FORRESTER ROAD
WESTVIEW FRAMES & TRUSSES
WESTBUS DEPOT
100
DP 1136503
221
DP 1025100
ARC - THE AUSTRALIAN REINFORCING COMPANY
HEAVY VEHICLE ACCESS ROAD
2220
DP 1172926
CAMIRA STREET
LIGHT VEHICLE ACCESS ROAD
CONTAINER REPAIR WORKSHOP 35m x 25m
TRANSPORT WORKSHOP 45m x 30m
FUEL STORAGE AREA
WASH BAY 40m x15m
ADMINISTRATION OFFICES 440m²
MAIN WESTERN RAILWAY
CONTAINER HARDSTAND
EXISTING SIDINGS
2031
DP 815293
SOUTH CREEK

PRELIMINARY

Used on / Next higher assembly:

Filename: B18028-SKC-1000.dwg

Alternate DMS number:

Rev	Date	Revision Description	Designed	Checked	Ind. Rev.	Approved	Accepted
B	05.09.19	ISSUED FOR REVIEW	S.O'B	MWE			
A	09.05.19	ISSUED FOR REVIEW	AK	SW			

Designing Company: Sydney Office

BG&E DOC No: B18028

Designed S.O'Brien

Checked S.West

Ind.Rev. Company | Ind.Rev. Name

Ind.Review Signature

pacific national

Approved By | Accepted By

Signed: | Signed:

Approval Date | Acceptance Date

BG&E

SK-C-1000

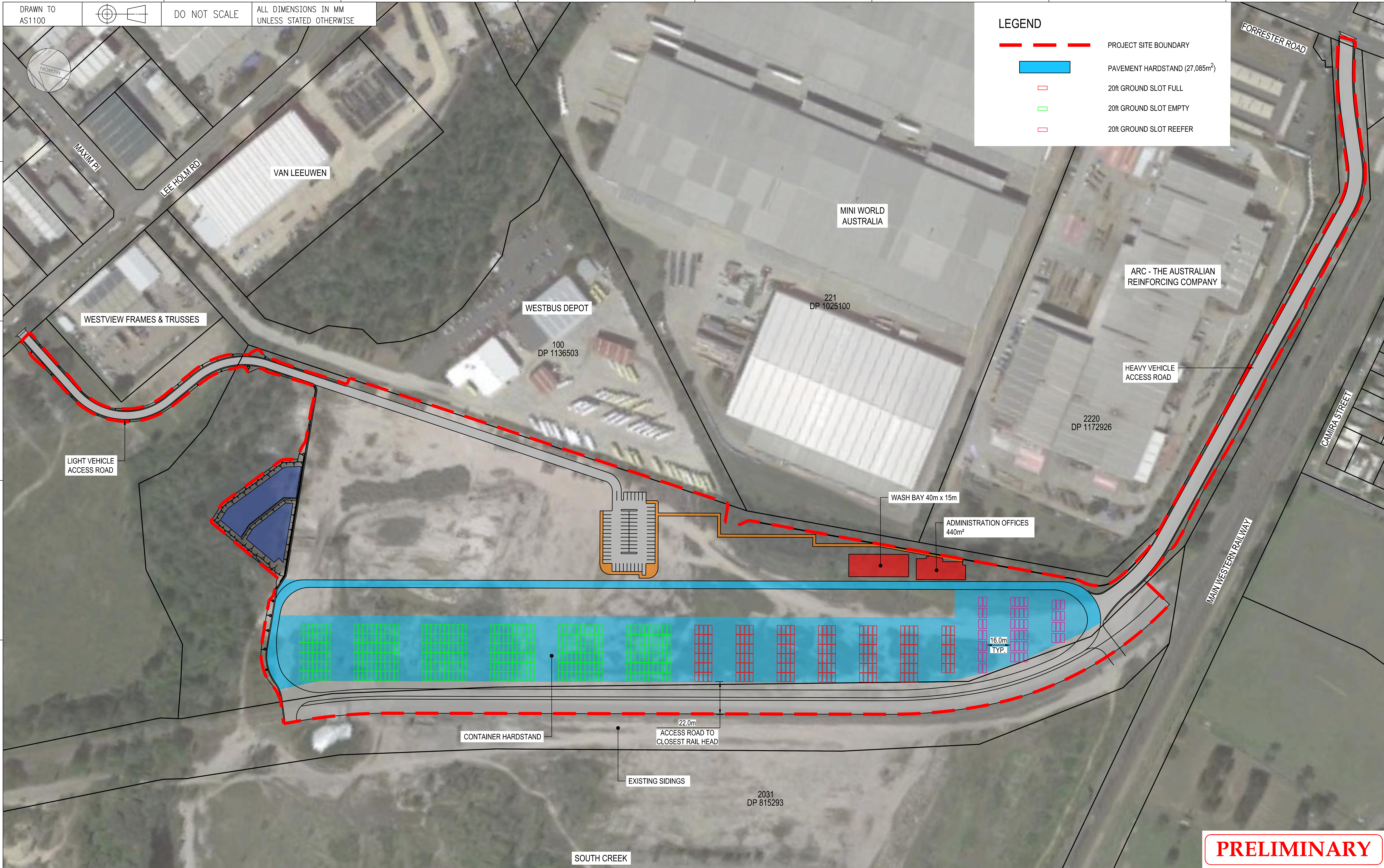
Sheet No. 1 of 1

Scale: NTS

SHEET SIZE A1

ST MARYS FREIGHT HUB
OVERALL LAYOUT PLAN

DRAWN TO AS1100 | DO NOT SCALE | ALL DIMENSIONS IN MM UNLESS STATED OTHERWISE



PRELIMINARY

Rev	Date	Revision Description	Designed	Checked	Ind. Rev.	Approved	Accepted
A	17.09.19	ISSUED FOR REVIEW	AK	SW			

Used on / Next higher assembly:

Filename: B18028-SKC-1011 to SKC-1013.dwg

Alternate DMS number:

Designing Company: BG&E — Sydney Office — L2, 8 Windmill St, Sydney NSW 2000 — P / +61 2 9770 3300 — E / info@bgeeng.com — bgeeng.com

BG&E DOC No: B18028

Designed: S.O'Brien

Checked: S.West

Ind.Rev. Company | Ind.Rev. Name

Ind.Review Signature

pacific national

Approved By | Accepted By

Signed: | Signed:

Approval Date | Acceptance Date

BG&E

SK-C-1011

Sheet No. 1 of 1 | Scale: NTS | SHEET SIZE A1

ST MARYS FREIGHT HUB

DRAFT INDICATIVE STAGING STRATEGY PLAN STAGE 1

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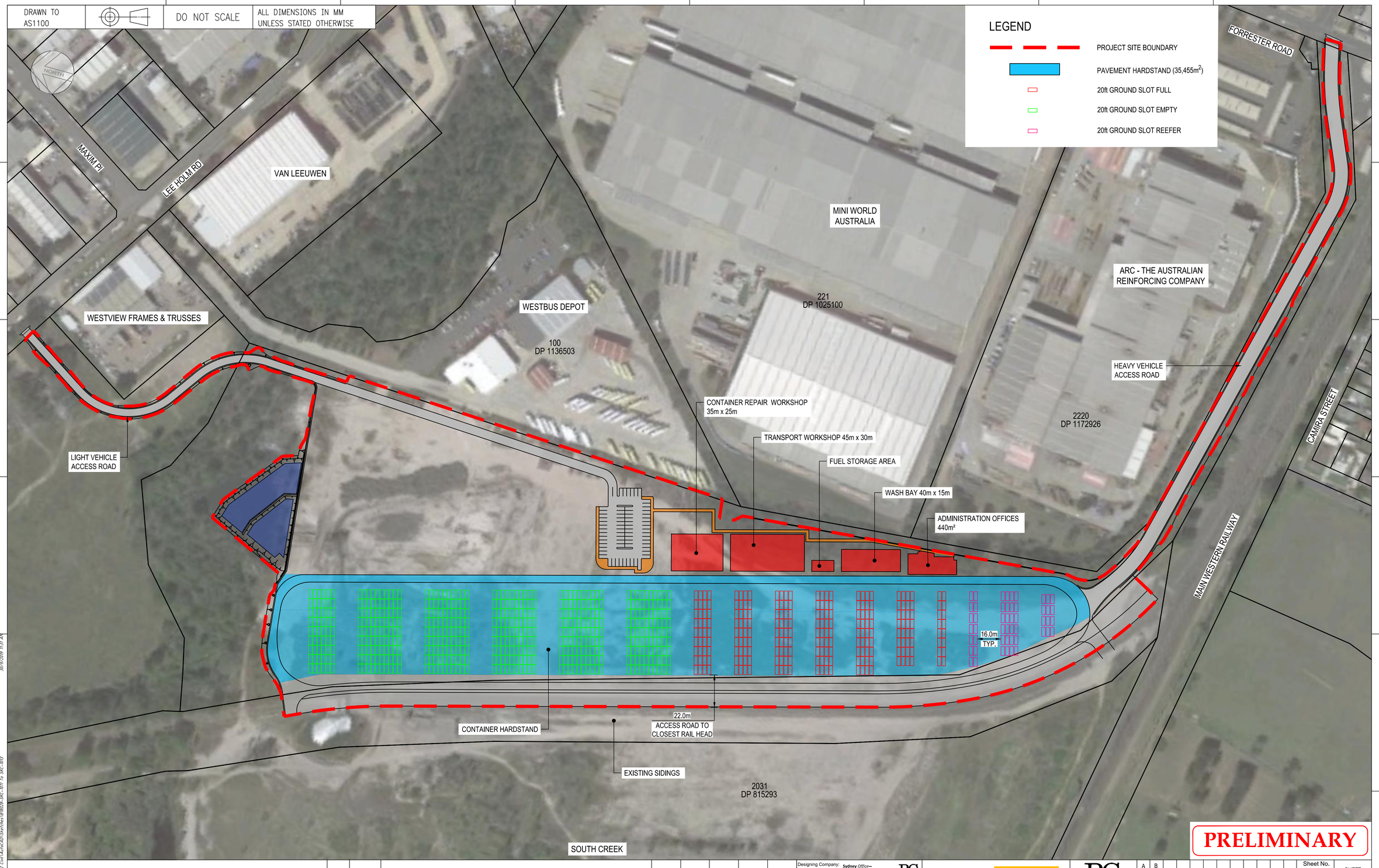
DRAWN TO AS1100 | DO NOT SCALE | ALL DIMENSIONS IN MM UNLESS STATED OTHERWISE



PRELIMINARY

Rev	Date	Revision Description	Designed	Checked	Ind. Rev.	Approved	Accepted
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Used on / Next higher assembly:

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Alternate DMS number:

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30/9/2019 11:31 AM

Designing Company: Sydney Office
BG&E DOC No: B18028
Designed S.O'Brien
Checked S.West
Ind.Rev. Company | Ind.Rev. Name
Ind.Review Signature

Approved By | Accepted By
Signed: | Signed:
Approval Date | Acceptance Date

pacificnational

BG&E

SK-C-1012

Sheet No. 1 of 1
Scale: NTS
SHEET SIZE A1

ST MARYS FREIGHT HUB
DRAFT INDICATIVE STAGING STRATEGY PLAN
STAGE 2

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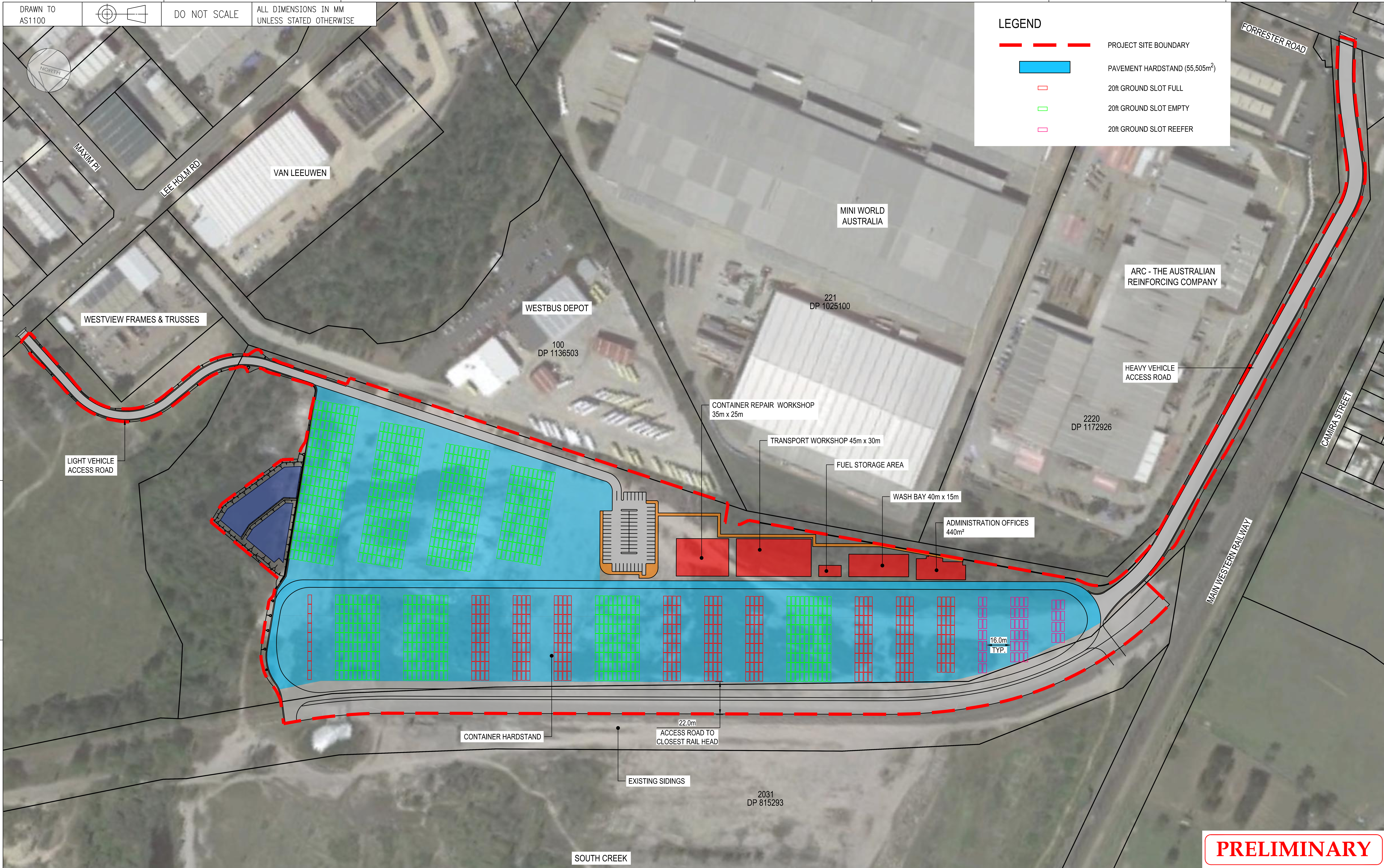


Rev	Date	Revision Description	Designed	Checked	Ind. Rev.	Approved	Accepted
A	17.09.19	ISSUED FOR REVIEW	AK	SW			

Used on / Next higher assembly:

Filename: B18028-SKC-1011 to SKC-1013.dwg

Alternate DMS number:

Designing Company: Sydney Office– L2, 8 Windmill St, Sydney NSW 2000 P / +61 2 9770 3300 E / info@bgeeng.com bgeeng.com–

BG&E DOC No: B18028

Designed S.O'Brien

Checked S.West

Ind.Rev. Company | Ind.Rev. Name

Ind.Review Signature

Approved By | Signed: | Approval Date

Accepted By | Signed: | Acceptance Date

SK-C-1013

Sheet No. 1 of 1

Scale: NTS

SHEET SIZE A1

ST MARYS FREIGHT HUB

DRAFT INDICATIVE STAGING STRATEGY PLAN STAGE 3

harwoodenviro.com.au

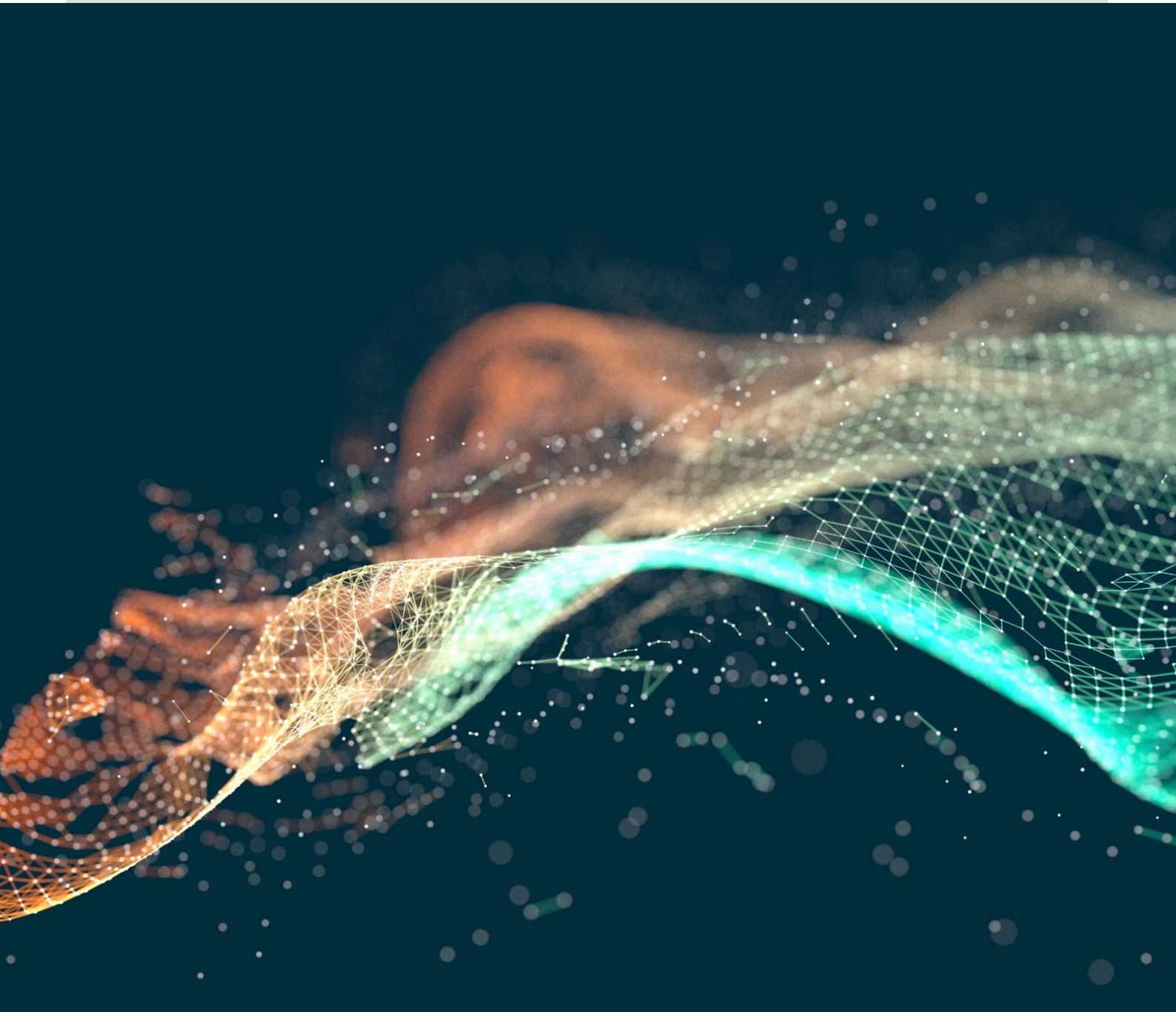
HARWOOD ENVIRONMENTAL CONSULTANTS

LONG TERM ENVIRONMENTAL MANAGEMENT PLAN

ST MARY INTERMODAL FACILITY – 2 FORRESTER RD, ST MARYS, NSW

Prepared for McMahons Services Pty Ltd | 11 November 2021

Version:04



Ref: LTEMP

5 November 2021

Melissa Porter
Site Auditor
Senversa Pty Ltd
Level 24, 1 Market St,
Djubuguli, Eora Country
Sydney, NSW, 2000 Australia

Dear Melissa,

Re: Enforceability and Implementation of the Long Term Environmental Management Plan (HEC, November 2021)

The legal owner of the land at 2 Forrester Road, St Marys, NSW, is responsible for the maintenance of the three contamination containment areas at the site as detailed in the Long Term Environmental Management Plan (HEC, November 2021). Currently, Pacific National Pty Ltd is the legal owner of the land at 2 Forrester Road, St Marys NSW.

If the land is subsequently sold, the purchaser of the land at that time will become new legal entity responsible for the maintenance of the three capped areas as part of their obligations as landowner. This responsibility will remain with the land. Therefore, each new purchaser acquiring the land from the previous landowner, will become the legal entity responsible for the maintenance of the three capped areas, from the date that that the land is legally transferred to that entity.

Yours faithfully

Rohan Togher
Manager Infrastructure Planning
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DOCUMENT CONTROL

Project number	21003

Version	Date	Author	Signature	Approver	Signature
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Disclaimer

The works have been performed its services in a manner consistent with the normal level of care and expertise exercised by members of the environmental assessment profession. No warranties expressed or implied are made.

Subject to the scope of work, the assessment was limited strictly to identifying the environmental conditions associated with the subject property and do not include evaluation of any other issues. The absence of any identified hazardous or toxic materials should not be interpreted as a guarantee that such materials do not exist on the subject property.

This report does not comment on any regulatory obligations based on the findings. This report relates only to the objectives stated and do not relate to any other work undertaken for the Client. It is a report based on the results and conclusions for the concentrations of contaminants observed in groundwater at the time of the sample collection. These conditions may change with time and space.

All conclusions and recommendations regarding the property are the professional opinions of the personnel involved with the project, subject to the qualifications made above. While normal assessments of data reliability have been made, HEC assumes no responsibility or liability for errors in any data obtained from regulatory agencies, statements, or sources outside of HEC, or developments resulting from situations outside the scope of this project.

HEC is not engaged in environmental assessment and reporting for the purpose of advertising sales, promoting or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. The client acknowledges that this report is for the exclusive use of the client.

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1. PURPOSE

1.1. Commissioning

Harwood Environmental Consultants (HEC) were commissioned by McMahons Services Pty Ltd to prepare this Environmental Management Plan (EMP) for the management of n areas of the site that contains residual asbestos in fill known as “PAEC1” and asbestos impacted soil contained within designated cells (“Cell 1 and cell 2”) at the site. The site is located at 2 Forrester Road, St Marys, NSW (see Figure 1 in Appendix A), and is currently being redeveloped as an intermodal facility.

1.2. Background

The Intermodal site is located at the terminus of the northern railway siding for the east-west rail line and has historically been used for general laydown of railway equipment, with the northern portion formerly owned by James Hardy Coy Pty Ltd. The St Mary’s Freight Hub (intermodal) is a State Significant Development under the provision of Schedule 1, Clause 19(1b) of the State Environmental Planning Policy - State and Regional Development 2011. As part of the development works, a road is required to be constructed from Lee Holmes Road in the north to provide access to the main intermodal site to the south.

The northern access road passes through an area of the site where uncontrolled fill material was present. Historical soil investigations completed by Douglas Partners in 2019 identified an area described as “former stockpile footprint” which contained uncontrolled fill material comprising rubble and bonded and friable asbestos to depth of approximately 1.3m below ground. DP (2019) referred to this area as “PAEC1”. The northern roadway runs through part of PAEC1. Further soil investigations along the proposed roadway were completed by ESS/HEC in May 2021 and identified further uncontrolled fill including bonded asbestos to the east of PAEC1 and road base and bitumen to a maximum depth of 0.3mBGL to the north west of PAEC1. The asbestos impacted fill was required to be removed to make way for the road.

A Remedial Action Plan (RAP) was prepared by Douglas Partners in 2020 (DP 2020) and a Remedial Works Plan (RWP) prepared by ESS/HEC in 2021 (ESS/HEC 2021a) to document the works required to remove the asbestos impacted fill and validate the excavations. Remedial works were completed and reported in the validation report (HEC 2021b). The remedial works included the excavation of asbestos impacted fill material to a depth of 0.3m below ground in PAEC1, and the excavation of all asbestos impacted fill from the northern roadway. The excavated material from PAEC1 was placed in Cell 1 and the material from the northern access road was placed in Cell 2. The validation report (HEC 2021b) should be read in conjunction with this EMP.

1.3. Purpose

This Environmental Management Plan (EMP) has been prepared to manage and mitigate potential human health and environmental risks posed by the presence of asbestos impacted fill in PAEC1 and the two containment cells. The fill material poses a negligible risk in its current state, however if the material is disturbed through earthworks or similar activities, the procedures described within this document will need to be followed to ensure the exposed receptors are protected. This EMP has been prepared in general accordance with the NSW EPA (2020) Guidelines for Consultants Reporting on Contaminated Land and the NSW EPA draft practice note for Preparing Environmental Management Plans 2020.

The main objective of this EMP is to ensure the site remains suitable for the proposed future land use

1.4. Duration

This EMP will be in effect until remediation of the site is completed that removes any complete or potentially complete exposure pathways to the fill material. Removal of the EMP will only be permitted when remediation of the site occurs, and the asbestos impacted material is removed.

For the EMP to be removed from the title, the following should occur:

- A Remediation Action Plan (RAP) be prepared.
- The asbestos impacted material classified for off-site disposal to an appropriately licenced landfill.
- Validation samples collected from the walls and base of the excavations.
- The validated excavations backfilled with VENM/ENM.
- A validation report be prepared.
- A Site Audit Statement be prepared which states that the site is suitable for the proposed land use without the requirement for the EMP.

1.5. How the plan will be made enforceable

The EMP is to be made legally enforceable through the following measures:

- The EMP is to be implemented by the owners and occupiers of the site. That is, the site owner(s) and/or tenants will be responsible for ensuring that the procedures outlined in this EMP are adhered to. Therefore, a copy of the EMP must be retained by the property owner and made available to tenants and also all contractors undertaking sub-surface works at the site. A copy of this EMP should also be included in all contracts of sale relating to the site and in the leasing documentation provided to prospective tenants. A copy of this EMP should also be provided to, and retained by, Penrith City Council.
- The EMP will be appended to the Site Audit Statement (SAS) prepared by the Site Auditor.
- The site owner will have ultimate responsibility for the implementation of the EMP. Therefore, any additional parties (e.g., tenants) that are proposing independent subsurface works must advise the owner prior to any works commencing.

1.6. Whether the environmental management plan is active or passive

In accordance with the NSW EPA draft practice note for Preparing Environmental Management Plans. Section 2.3 state the following regarding capping and containment:

Passive management systems may … be used where contamination:

- is at depth below a building footprint or a cap
- has no services running through it
- has no potential access to it.

These three conditions are met at the site, and therefore the EMP is passive.

1.7. Parties responsible for implementation and review/maintenance of the plan and their tasks

The parties responsible for the implementation and review of this IEMP are described below:

Table 1 Responsible Parties

Responsible Party	Task
Site Owner	Owner of EMP Implementation of EMP Public and internal notification of EMP Review of EMP to ensure it meets the objective of protecting receptors from risks at the site. The review should consist of changes in site condition, changes in legislative requirements including any applicable management order, ongoing maintenance order of licenses, and changes in industry best practice. Review procedures are discussed in further detail in Section 6.

1.8. Where the plan will be recorded

The EMP will be appended to the Site Audit Statement and will be included in the Section 10.7 Planning Certificate for the property. A hard copy of the EMP should also be kept on site.

2. BACKGROUND

2.1. Site identification

The site identification details are provided below:

Table 2 Site Identification

Item	Entire Site	PAEC1	Cell 1	Cell 2
Street Number	2 Forrester Road St Marys, NSW			
Lot number and Deposited Plan number	Lot 2 DP 876781, Lot 3 DP 876781, Lot 196 DP 31912 Lot 2031 DP 815293	Part Lot 3 DP 876781	Part Lot 2 DP 876781	Part Lot 2 DP 876781
Geographic Co-ordinates	-33.755023 150.770284	-33.754947 150.770157	-33.758579 150.770406	-33.756741 150.770117
Area	Approximately 11ha	PAEC1 = 600m^2 Roadway = 1,920m^2 Remediated roadway area = 720m^2	200m^2	1000m^2
Local Government Area	Penrith City Council			
Current Zoning	IN1 – General Industrial (Penrith City Council LEP 2010)			
Site Location	Figure 1, Appendix A			
Site Layout	Figure 2, Appendix A			

2.2. Summary of site history

A summary of the site history is provided below:

- The investigation area including PAEC1 is located within Lot 3 DP976771 on the northern boundary of the site within an area marked as an access road for the future development. Douglas Partners (2019) state that Lot 3 was previously registered under the name of James Hardie & Coy Pty Ltd between 1969 and 1984 and under the name of Colmlee (Lands) Pty Ltd between 1984 to 1986 before State Rail Authority acquired the land in 1986. James Hardie manufacture and distributed asbestos base building products. It is not known if the site was used manufacturing of these products.
- PAEC1 was defined by Douglas Partners in the PSI (2019a) as “Former building and stockpile footprints - A fragment of ACM was identified in one former stockpile footprint area in the far northern portion of the site”. A review of historical photographs provided in Douglas Partners (2019a) and in Google Earth indicate the area may have been used for the laydown of material. The photograph from 2004 appears to show a series of elongated pits in the area which may have been used for the burial of material. Subsequent photographs show these pits to become vegetated and eventually the whole of PAEC1 overgrown with vegetation.

2.3. Current/future site use and layout

The current and future site use is commercial/industrial. If this land use changes, the EMP will need to be reviewed.

3. DESCRIPTION OF RESIDUAL CONTAMINATION

A summary of the residual contamination present at PAEC1, Cell 1 and Cell 2 is provided below.

Table 3 Residual Contamination Description

Location	Residual Contamination
PAEC1	Asbestos impacted fill material is present in the from 0.3m to approximately 1.0m below ground level. Soil samples from this area shave shown that asbestos is the only contaminant of potential concern (CoPC). The asbestos in this area has been shown to be bonded, however the presence of friable asbestos/asbestos fines cannot be ruled out. The residual fill material is described as dark brown, gravelly clays with crushed red brick, concrete and other building materials. The PAEC1 area is capped with a 0.3m layer of crushed sandstone and topped with mulch. A high visibility marker layer is present on the surface of the residual fill material.
Cell 1	The material placed in Cell 1 contains both bonded asbestos and asbestos fines at concentrations exceeding human health criteria. The concentrations of all other CoPC do not exceed commercial/industrial land use criteria. The material placed into Cell 1 was observed to comprise coarse gravel road base material, pale grey rock fragments / gravels in pale brown sandy, silty gravels. The cap is comprised of a high visibility marker layer on top of the fill, 500mm of crushed sandstone and to surface.
Cell 2	Cell 2 is filled from the base to 1.6m below ground with the fill containing bonded asbestos and asbestos fines. The concentrations of all other CoPC do not exceed commercial/industrial land use criteria. The material placed into Cell 2 was observed to comprise dark brown / grey sandy gravels and clayey gravels; building rubble: Brick, concrete, metal and ACM; plastics, glass, terracotta. The cap is comprised of a high visibility marker layer is present on top of the fil, followed by 800mm of crushed sandstone and 800mm of road pavement (DGB20) to surface.

Cross sections of the capped areas are provided in Appendix A.

4. MANAGEMENT ACTIVITIES

4.1. Activities and procedures

As stated above, the asbestos contaminated fill material is present at PAEC1, Cell 1 and Cell 2. The management procedures described below are intended for the mitigation of risks to site workers such as gardeners (PAEC1) and maintenance crews. If large scale soil disturbance works are proposed such as remedial, or excavation of soils in PAEC1 or the cells, then a more detailed environmental management plan should be prepared to ensure protection of the receiving environment.

Potential human health risks associated with ground breaking activities at the site relate to:

- The generation and inhalation of contaminated dust during earthworks.
- Off-site impacts from dust generation.

To mitigate the potential risks posed to receptors, the following management procedures should be followed:

- Site workers must be inducted into the site and made aware of the EMP. Site workers must read the EMP and be aware of their responsibilities.
- Works should be planned to avoid soil disturbance wherever possible. The site owner/manager must be made aware of any potential soil disturbance activities so that appropriate management arrangements can be made.
- If soil disturbance or contact is required into the marker layer, the following must be implemented:
  - The site cordoned off to prevent pedestrian access.
  - Site personnel must wear appropriate personal protective equipment including (at a minimum):
    - Nitrile gloves
    - P2 dust mask
    - Eye protection
    - Long sleeved shirt and long trousers
    - Steel capped boots.
  - Additional PPE requirements for excavation into asbestos impacted material would be required.
  - To mitigate potential offsite discharges, the following sediment and stormwater controls must be implemented prior to and during earthworks:
    - The excavation area and site boundary must be bunded and have silt fencing in place to prevent offsite migration of silt-laden runoff.
    - Establishment of a ‘clean-water’ diversion measure, such as a bund or drain, to prevent water running onto the area.
  - Disturbed soil and capping measures, must be reinstated and compacted as soon as practicable to prevent erosion, runoff, and dust generation.
  - If excess soil is generated, it must be stockpiled and sampled by a suitably qualified environmental consultant and classified for disposal to a licenced waste facility in accordance with the NSW EPA (2014) Waste Classification Guidelines. The stockpiles must be bunded to prevent runoff and covered to prevent dust generation.
  - If soil disturbance is required, the area should be wetted down in advance to prevent dust generation.
  - Any asbestos impacted soil/fill excavated must be stockpiled separately on a sealed surface or plastic sheeting to prevent cross contamination.

- Following completion of disturbance works, the marker and capping layers to be reinstated with material of a similar nature as originally present, as described in this LTEMP.
- Inspection and validation of the reinstated marker and capping layer must be undertaken by a suitability qualified and experienced environmental consultant whom is also a Licensed Asbestos Assessor.

If PAEC1 and/or the areas of the site where the cells are located are proposed to be developed in the future, the following should be considered:

- Excavation and off-site disposal of the asbestos impacted material stored in the cells.
- Excavation of another cell elsewhere on the site and relocation of the stored materials.

Any disturbance of the asbestos impacted material should be done so under asbestos controls. An asbestos management plan should be prepared by a Licenced Asbestos Assessor which is to include the controls to be followed, such as:

- air monitoring.
- exclusion zone.
- decontamination area.
- PPE.
- haulage route for movement of material.
- Consideration of relevant notifications.
- supervision requirements by asbestos removalist.
- clearance requirements.

Asbestos works should be completed in accordance with the following guidelines and legislation”

- Work Health and Safety Act 2011
- How to manage and control asbestos in the workplace Code of Practice, Safework Australia, 2011a
- How to safely remove asbestos Code of Practice, Safework Australia, 2011b
- Work Health and Safety Regulation 2017.

4.2. Management structure and responsibilities

The following table lists the roles and responsibilities of those parties to which this EMP applies:

Table 4 Roles and Responsibilities

Stakeholder	Actions
Penrith City Council	• Review and endorsement of EMP. • Update Section 10.7 Planning Certificate to identify the existence of the EMP. • Registration of Site Audit Statement and Site Audit Report and EMP with EPA.
Site Owner	• Notification of contractors/lessees of the existence of the EMP. • Notification of future owners of the existence of the EMP. • Induction of site visitors to the EMP. • Maintain records of site inductions.
Site Manager	• Notification of contractors/lessees of the existence of the EMP. • Compliance with EMP. • Inclusion of EMP in future Work Method Statements/Construction Environmental Management Plan. • Induction of site visitors to the EMP.

Stakeholder	Actions
	• Maintain records of site inductions. • Responsible for inspections and oversight during accidental/planned breach of capping (e.g., potholes, cracks, trenching work)

4.3. How the plan sits within an existing environmental management system

This EMP does not sit within any existing Environmental Management System.

4.4. Relationship to a planning instrument

The site development is subject conditions provided in the approved Development Consent number SSD 7308 dated 7th May 2020, with subsequent approvals dated 21 September 2020, 29 October 2020, 17 December 2020 and 20 January 2021.

The SSD conditions do not require this EMP, however the following conditions apply with regard to contamination:

- Implement the preferred remediation option for PAEC 1 as presented in the RAP report
- Undertake the remediation and construction works in accordance with the Interim Environmental Management Plan.
- Any contaminated material identified during construction (if any) will be managed and remediated to EPA and NSW Office of Environment & Heritage Guidelines.

4.5. Reporting requirements

There are no reporting requirements specific to this EMP.

4.6. Communications protocols

Communications protocols are as follows:

- All workers who attend site must be inducted to the EMP prior to attending site.
- Site workers must inform the asset owner of the scope of work including the likelihood of soil disturbance, generation of excess soil, generation of dust, potential impact to receptors prior to attending the site.
- The site owner/manager must be informed of the exposure/disturbance of soils as soon as practicable so that the site can be made safe.

An example induction form is provided in Appendix B.

4.7. Emergency contacts and response, including 24-hour emergency phone number

Emergency contacts include:

- Police/Fire/Ambulance: 000
- Site Owner: TBC

4.8. Operating hours

Not applicable.

4.9. Contingency plans

The above management and mitigation measures may be altered/updated in the event that one or more of the following occur:

- Remediation of the site is proposed.

- If intrusive works such as installing pipelines or other infrastructure is proposed.
- The site is redeveloped.
- An unexpected event occurs at the site which results in damage to the site – e.g., flood or earthquake.

If any of the above occurs, the site should be made safe as follows:

- the area cordoned off to prevent access immediately.
- the area damped down and/or covered to prevent dust generation immediately.
- a suitably qualified environmental professional should be consulted as soon as practicable to determine the works required to ensure continued suitability of the site is maintained.

If unexpected material is encountered (i.e., hydrocarbon stained or odorous soil, unusually coloured soil, anthropogenic material such as refuse, or potential ACM) works shall cease immediately and advice shall be sought from a suitably qualified environmental professional(SQEP). The SQEP will assess the material and advise on its management and a site contamination report shall be prepared. Where relevant the report shall document: the nature and extent of the material; its suitability to remain on site (from an environmental and human health perspective); disposal location and volumes.

5. INSPECTION, MAINTENANCE, ENVIRONMENTAL SAMPLING, ANALYSIS AND REPORTING

As defined the NSW EPA (2020) Technical Note – Environmental Management Plans, as PAEC1, Cell 1 and Cell 2 are capped active monitoring is not required. Annual inspection of the surface of the capped areas at PAEC1, Cell 1 and Cell 2 is required to ensure the integrity is not compromised. Recording of the inspections should be completed on the monitoring form included in Appendix C.

6. MONITOR AND REVIEW OF ENVIRONMENTAL MANAGEMENT PLAN

The site owner or delegate must ensure the EMP is kept up to date and a copy is readily accessible on the Site. The EMP should be reviewed by a suitably qualified consultant at least once every five years or when one or more of the following occurs:

- There is a change of ownership.
- Demolition/remediation of the site occurs.
- If intrusive works such as installing pipelines or other infrastructure is proposed.
- The plan is no longer adequate for managing risks to human health and/or the environment at the site

The review of the IEMP should include (but not be limited to):

- Review of any inspections by owner's representative.
- Incorporation of any regulatory changes.

7. COMMUNICATIONS AND NOTIFICATIONS

7.1. List of stakeholders

Stakeholders relevant to the property include:

Table 5 Stakeholders

Stakeholder	Rationale
Pacific National	Site owner
Contractors working on the site (e.g., landscapers)	Will require access to the site
Penrith City Council	Review and endorse enforceability of this EMP

7.2. Details for how affected stakeholders including potential purchasers will be notified of the residual contamination and the environmental management plan

Affected stakeholders will be notified of the EMP and residual contamination at the site through:

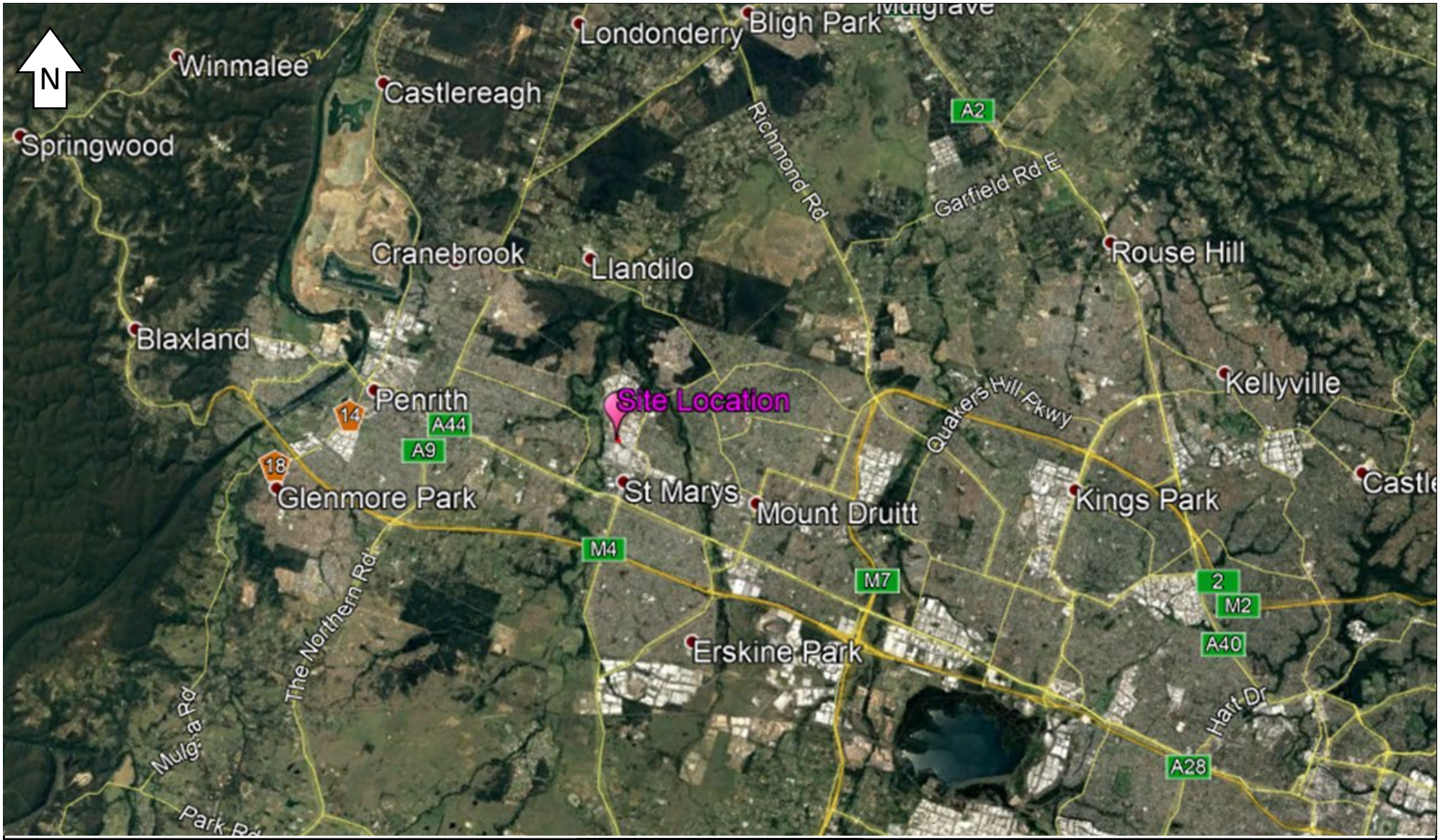
- Registration on the Section 10.7 Planning Certificate.
- Voluntarily notifying stakeholders and potential purchasers to the presence of the EMP.

7.3. How the environmental management plan is communicated and made enforceable, including any financial assurance requirements

The EMP will be made enforceable by review and endorsement by Penrith City Council. The EMP will be attached to the Site Audit Statement, which will be included int eh Section 10.7 Planning Certificate.

APPENDIX A

FIGURES



Base map:
(2021 Nearmap)

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Figure 1: Site Location

21003: St Mary's Intermodal Asbestos Remediation

Base map: (2021 Nearmap)c

⊕ *Groundwater monitoring well*

0m 10 50

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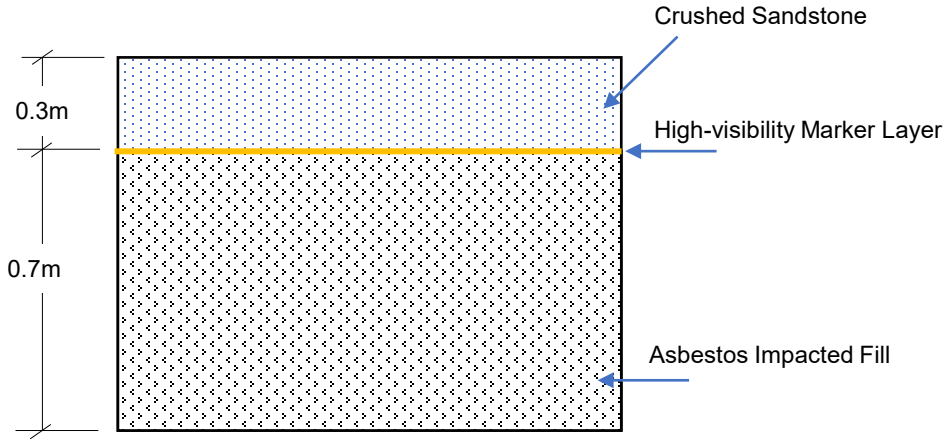
Figure 2: Site Layout

21003: St Mary's Intermodal Validation – PAEC1, SP4 and Cells

PAEC 1



Note: cross-section applies to area outside of road. Roadway does not have maker layer and has been excavated to natural material

Not to scale

See Figure 2 for co-ordinates of capped area.

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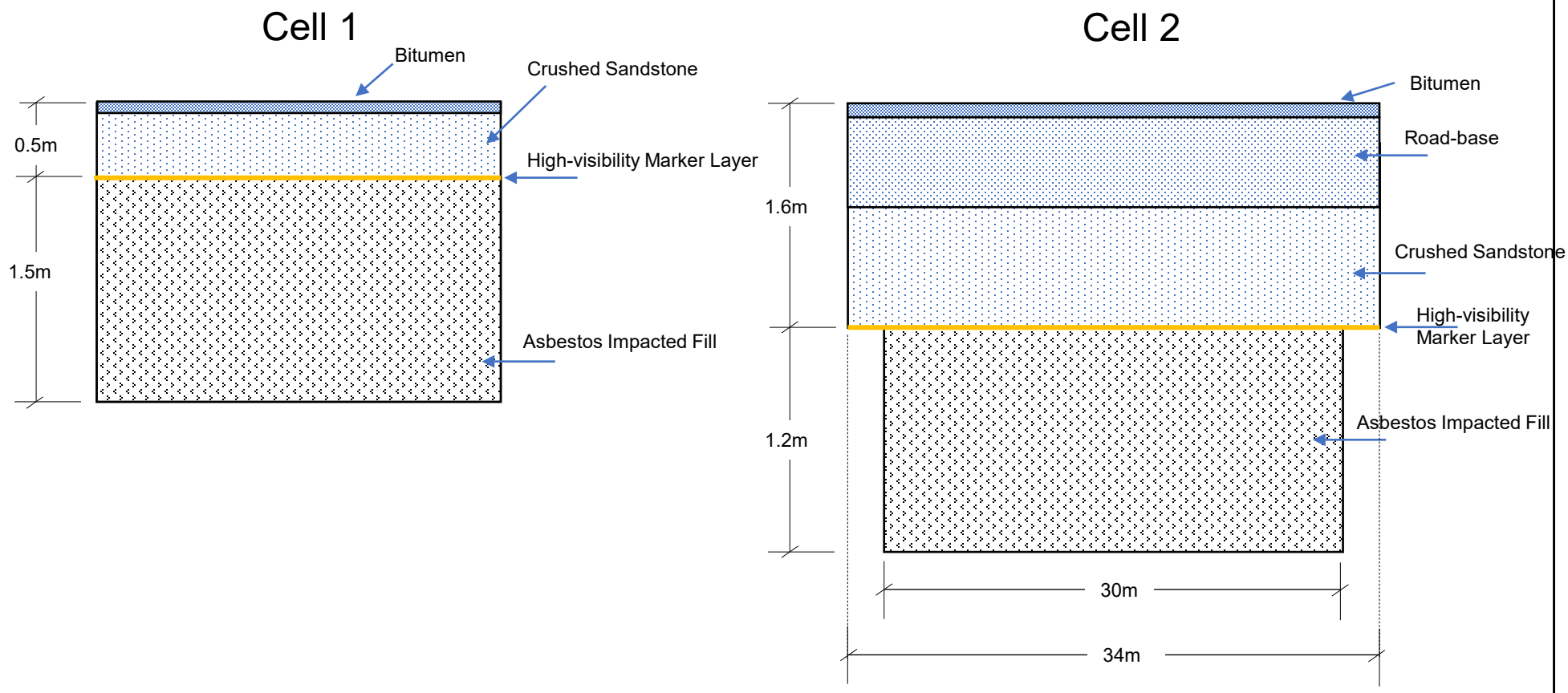
Figure 3: PAEC1 Cross Sections

21003: St Mary's Intermodal Asbestos Remediation



Not to scale

See Figure 3 for co-ordinates of cells.

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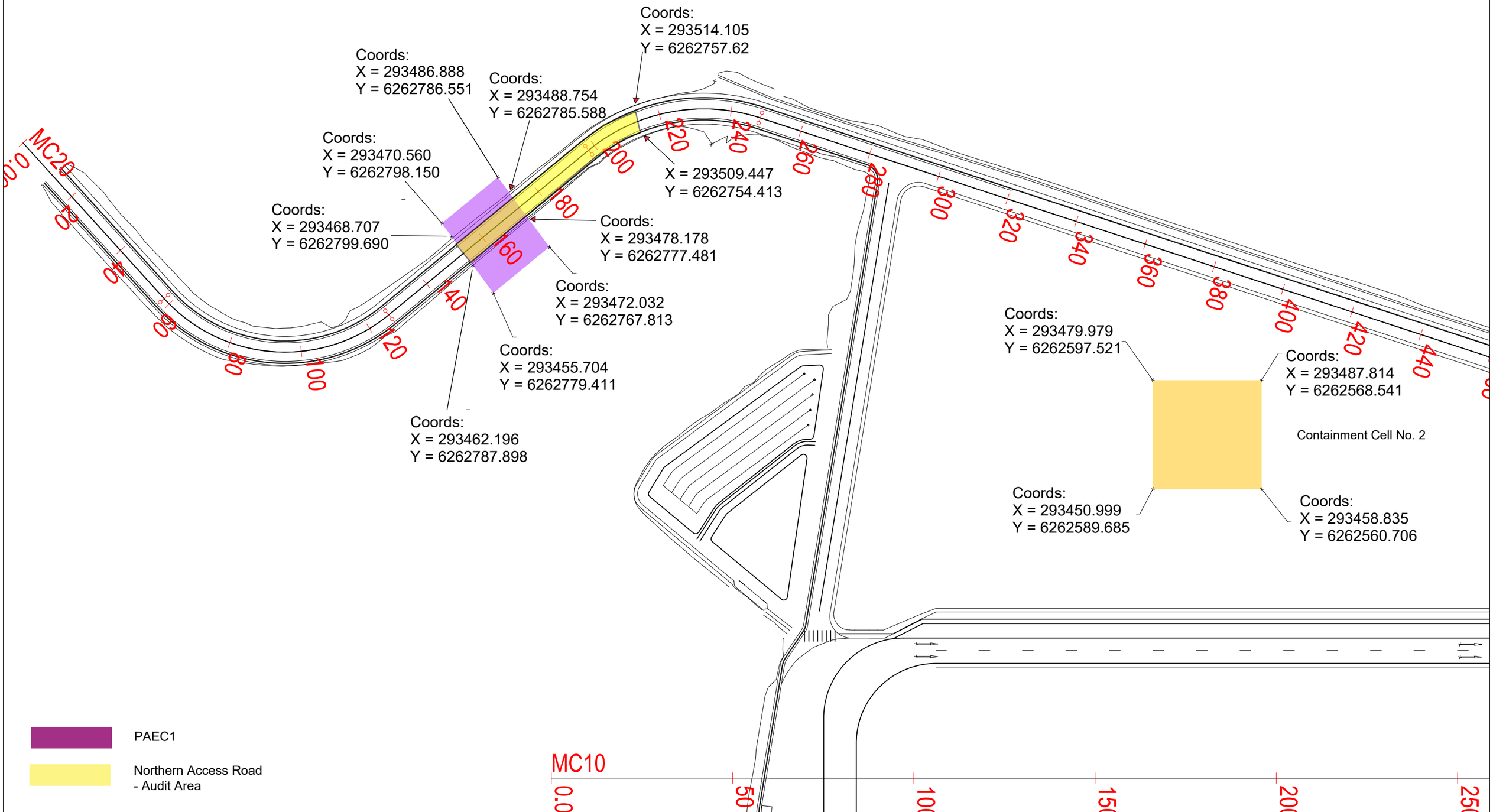
Figure 4: Cell Cross Sections

21003: St Mary's Intermodal Asbestos Remediation



McMahon Services - ST Marys Rail Hub

LV Access Road Box Out

12d Model

Scale 1:1000

Mon Jun 28 13:42:47 2021

Coords:
X = 293479.979
Y = 6262597.521

Coords:
X = 293487.814
Y = 6262568.541

Containment Cell No. 2

Coords:
X = 293450.999
Y = 6262589.685

Coords:
X = 293458.835
Y = 6262560.706

Coords:
X = 293507.567
Y = 6262441.658

Containment Cell No. 1

Coords:
X = 293506.511
Y = 6262421.686

Coords:
X = 293497.581
Y = 6262442.186

Coords:
X = 293496.525
Y = 6262422.214

50 100 150 200 250 300 350 400

McMahon Services - ST Marys Rail Hub
Containment Cells 1 & 2

12d Model
Scale 1:1000
Mon Jun 28 12:35:53 2021

APPENDIX B

EXAMPLE INDUCTION FORM

INDUCTION FORM

DATE:

LOCATION:

INDUCTION COMPLETED BY:

Name ***Signature***

INDUCTED PERSON DETAILS:

Name:

Company

Signature:

1. Have you read the EMP?

2.Are you aware of location of the containment cells?

3. Are you aware of your responsibilities under the EMP?

4. Are you aware of the management and mitigation measures in the EMP?

INDUCTION REGISTER

Name	Date	Inducted By

APPENDIX C

INSPECTION FORM

INSPECTION FORM

DATE:

LOCATION:

COMPLETED BY:

INSPECTION DETAILS/COMMENTS

ACTIONS

	Details	To be compelted by (date)
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

SIGNATURE

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