

30 March 2017

Mr Paul Jerogin  
Lendlease Building Pty Ltd  
L14, Tower Three, International Towers  
300 Barangaroo Avenue, NSW, 2000

Dear Paul,

## **Re: SSD 7534 MOD1 – Western Sydney Stadium Stage 1 Response to NSW EPA Submission**

Lendlease Building Pty Ltd (Lendlease) has engaged Senversa Pty Ltd (Senversa) to provide consulting advice in relation to management of contamination issues for the Western Sydney Stadium project.

This letter presents responses to comments relating to site contamination from NSW EPA in a submission dated 21 February 2017 to the application to modify the consent for Western Sydney Stadium Stage 1 (SSD 7534 MOD1).

The response below refers to the Remedial Action Plan (RAP) prepared by Senversa dated 2 February 2017 and the Site Audit Statement (SAS) / Site Audit Report (SAR) prepared by Graeme Nyland, an EPA accredited Site Auditor, of Ramboll Environ Australia Pty Ltd dated 6 February 2017.

### **Recommendation 1**

*“The proponent be required to ensure all services and service trenches lie above the proposed marker layer to minimise any risks to workers undertaking future repair and maintenance of those services.”*

The provision for service construction is outlined in the Auditor approved RAP (Section 4.5.7), which says that services will be constructed in VENM/uncontaminated backfill to the extent practicable. There may be deeper large services or existing services that cannot practically be placed above the marker layer, and that have a reasonable and practicable future management method under a long term management plan. Specific details of services construction will be documented in a Work Plan, which will require Auditor approval. The Auditor will also have to audit that the approved designs have been constructed appropriately.

### **Recommendation 2**

*“The proponent be required to ensure all clean material to be used for the capping layer comprises virgin excavated natural material.”*

The Auditor approved RAP (Section 4.5.5) requires that capping material be environmentally suitable material for human and/or ecological exposure (as appropriate), including virgin excavated natural material (VENM), clean Site-won material, Excavated Natural Material (ENM) or material certified in accordance with an exemption issued by the NSW EPA. The Auditor endorsed this approach in the SAR.



Senversa considers that there are materials that don't come under the definition of VENM that would be appropriate (and in some cases better suited) for capping, and request some flexibility here to facilitate appropriate construction only after Auditor approval.

### **Recommendation 3**

*"The proponent be required to undertake hazardous material audit of existing structures prior to demolition and to remove all hazardous materials at the direction of an appropriately qualified occupational hygienist."*

Lendlease informed Senversa that hazardous materials surveys of stadium and swimming pool structures have been conducted.

### **Recommendation 4**

*"The proponent be required prior to commencing work to prepare and implement an appropriate procedure for identifying and dealing with unexpected finds of site contamination."*

The RAP contains an Auditor approved unexpected finds protocol.

### **Recommendation 5**

*"The proponent be required to satisfy the requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 'asbestos wastes'."*

The intention is to minimise waste generation (i.e. removal and disposal off-site). In the circumstance where waste material is removed off-site the Auditor approved RAP includes requirements for classification and tracking of waste materials, which must be conducted in accordance with the *Waste Regulation 2014*, including specific requirements in relation to asbestos waste in Part 7. Material tracking and waste disposal documentation will be collated by Senversa so that the Auditor can confirm adherence to the relevant regulatory requirements during and at the end of the project.

### **Recommendation 6**

*"The proponent be required to consult with Safework NSW concerning the handling of any asbestos waste that may be encountered during the course of the project."*

Lendlease will comply with SafeWork NSW notification requirements, and will liaise with SafeWork NSW as required.

### **Recommendation 7**

*"The proponent be required to implement site auditor recommendations"*

Senversa considers that the recommendations are addressed in the RAP, SAR and as part of the required site audit process. A requirement to implement the RAP would address these recommendations.

Senversa notes the following:

- a) The RAP requires preparation of a Work Plan, data gaps SAQP and validation SAQP for Auditor approval.
- b) The RAP requires implementation of these following Auditor approval.
- c) The RAP requires preparation of a long-term management plan on completion of construction for Auditor approval and implementation. The plan will address the recommended components.
- d) The RAP requires that a construction environment management plan and asbestos management plan be prepared prior to remedial works commencing. Senversa understands that preparation of the works management plan(s) will be completed by Lendlease, and advised by Senversa and an occupational hygienist as necessary, for Auditor approval prior to remediation works commencing.



## Recommendation 8

*“The proponent be required to ensure management plans for the construction works and waste management are reviewed by the site auditor.*

Senversa, an experienced environmental consultancy with three NSW EPA accredited Site Auditors, will seek to ensure that we engage with Mr Nyland at the relevant times and that the information he receives should enable him to provide an appropriate Section A SAS, conditioned with an approved site management plan(s), and that his position as Auditor is not compromised throughout the process.

If you have any comments or questions, please do not hesitate to contact the undersigned at [andrei.woinarski@senversa.com.au](mailto:andrei.woinarski@senversa.com.au) or via telephone on (02) 8252 0000.

Yours sincerely,

**Ian Batterley**  
Senior Associate

IB/AW

**Andrei Woinarski**  
Senior Associate

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