

18 November 2020

Ref: IA 0301-2014_06

Noel McGowan
Moorebank Intermodal Company
Suite 33.3, Level 33
1 O'Connell Street
Sydney NSW 2000

Via email only: noel.mcgowan@micl.com.au

Dear Mr McGowan,

RE: Site Audit Interim Advice 06 – Review of Revised LTEMP for MPW, Moorebank Intermodal Terminal.

James Davis of Enviroview Pty Ltd has been engaged to provide the services of a NSW EPA Contaminated Land Accredited Site Auditor, to conduct a Site Audit in relation to the land to be developed for the Moorebank Intermodal Terminal located at Moorebank Avenue, Moorebank, NSW, in accordance with the *Contaminated Land Management Act 1997* and relevant guidelines made or approved under s.105 of that Act.

The objective of the Site Audit is to provide a Site Audit Report and Site Audit Statement to certify, in relation to contaminated land, the Auditor's opinion of whether the site is suitable for the proposed commercial/industrial development.

A Site Audit Interim Advice is provided by a Site Auditor to assist in the management of contamination issues in regard to the requirements of the Site Audit at a particular stage of the Site Audit, prior to issuing the Site Audit Statement. An interim advice does not constitute a Site Audit Statement or a Site Audit Report and does not pre-empt the final Site Audit conclusions. A Site Audit Report and Site Audit Statement will be prepared at the conclusion of the Site Audit.

The purpose of this interim advice is to provide comment with regard to the review of the following revised report:

EP Risk. *Moorebank Intermodal West (MPW) – Long-Term Environmental Management Plan*. (Report Ref.: EP1489.001 v12). 27 October 2020.

The auditor has previously reviewed earlier drafts of this report as documented in Interim Advice # 32, dated 5th March 2020, Interim Advice # 35 dated 28th July 2020, Interim Advice # 37 dated 11th August 2020, Interim Advice # 38 dated 19th August 2020, Interim Advice # 0301-2014-02 dated 22 September 2020, and Interim Advice # 0301-2014-05 dated 22 October 2020. A version of the LTEMP (v8) formed a condition of a Site Audit Statement (0301-1613-7) that was issued regarding the site suitability by the site auditor for MPW on the 18 September 2020.

The LTEMP was further developed by the consultant to incorporate necessary updates following the completion of addition remediation and validation works conducted at the site in accordance with the Contamination Management Plan (CMP) (EP Risk, July 2020) and as

documented in the Supplementary Validation Report (JBS&G, Sept 2020) with subsequent versions (v9) further incorporating these works and developing the future approach to residual soils impacted with PFAS at the site.

In order to further refine decision points for reuse of PFAS-impacted materials at the site, EnRiskS developed the *Moorebank Intermodal Terminal – LTEMP Material Reuse Risk Assessment for PFAS*. The final version of this risk assessment was dated 9 October 2020. The auditor reviewed this document as reported in Interim Advice 0301-2014-03 and 0301-2014-04 dated 1 October 2020 and 14 October 2020 respectively.

The subsequent version 11 (v11) of the LTEMP was developed by the consultant to incorporate the recommendations from the EnRiskS risk assessment document with regard to reuse of PFAS-impacted soils on site. Following auditor review of v11 as documented in Interim Advice # 0301-2014-05, and incorporation of comments as pertinent, the current version 12 (v12) of the LTEMP was prepared by the consultant.

Revised LTEMP v12 (27 October 2020)

A response to auditor comments from IA # 0301-2014-05 on version 11 of the LTEMP, provided by the consultant EP Risk, was submitted together with the revised version 12 of the document.

The auditor has reviewed the final (v12) version of the LTEMP and finds that it has sufficiently incorporated prior audit review comments.

The LTEMP should be implemented going forward as pertinent for residual contamination issues during Stage 2 construction works at the site as defined within the plan, and will form a condition to the Site Audit Statement that is currently being prepared and will be issued at the completion of this Site Audit

Thank you for your time regarding this matter. If you require additional information or clarification, please do not hesitate to contact me.

Yours sincerely



James Davis
NSW EPA Contaminated Land Site Auditor
Enviroview Pty Ltd