

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 31st October 2012. For more information about completing this form, go to Part IV.

PART I: Site audit identification

Site audit statement no. GN 401-8B

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: Graeme Nyland Company: ENVIRON Australia Pty Ltd

Address: Level 3, 100 Pacific Highway (PO Box 560)

North Sydney NSW

Postcode: 2060

Phone: 02 9954 8100

Fax: 02 9954 8150

Site details

Address: Cosgrove Road, Enfield

Postcode: 2136

Property description (*attach a list if several properties are included in the site audit*)

Proposed Lot 7 - Warehouse C, Proposed Lot 18 - Administration Area and Part Proposed Lot 22 and Part Proposed Lot 4 - Detention Basin. These proposed lots are shown as Validation Area 5 on the attachment at the end of Part I of this statement.

These proposed lots are located over current Part Lot 2 DP1006861, Part Lot 101 DP 1001498 & Part Lot 14 DP 1007302.

Local Government Area: Strathfield Municipal Council

Area of site (e.g. hectares): Approximately 2.6 hectares

Current zoning: General Industrial IN1

To the best of my knowledge, the site **is/is not*** the subject of a declaration, order, agreement or notice under the *Contaminated Land Management Act 1997* or the *Environmentally Hazardous Chemicals Act 1985*.

Declaration/Order/Agreement/Proposal/Notice* no(s): N/A

***Strike out as appropriate**

Site audit commissioned by

Name: Christa Sams Company: Sydney Ports Corporation, now
NSW Ports

Address: Level 8, 207 Kent Street, Sydney, NSW 2008

Postcode: 2008

Phone: 9296 4999 Fax: 9296 4742

Name and phone number of contact person (if different from above)

Roland Marshall of NSW Ports 9296 4999

Purpose of site audit

- A. To determine land use suitability (*please specify intended use[s]*)

Intermodal Logistics Centre

OR

~~B(i) To determine the nature and extent of contamination, and/or~~

~~B(ii) To determine the appropriateness of an **investigation/remedial
action/management plan***, and/or~~

~~B(iii) To determine if the land can be made suitable for a particular use or uses by
implementation of a specified **remedial action plan/management plan*** (*please
specify intended use[s]*)~~

.....

Information sources for site audit

Consultancy(ies) which conducted the site investigation(s) and/or remediation

- CMPS&F Environmental
- Coffey Environments Australia Pty Ltd (Coffey)
- Hibbs and Associates Pty Ltd (Hibbs)
- CH2M Hill Australia Pty Ltd (CH2M Hill)
- Douglas Partners (Douglas)
- Enviropacific Services (Enviropacific).
- Network Geotechnics

Title(s) of report(s) reviewed:

- 'Enfield Marshalling Yard Soil Validation Report' dated June 1996 by CMPS&F Environmental.
- 'Part A of the Contamination Assessment at the Former Enfield Marshalling Yard' dated July 1999 by CH2M Hill.
- 'Crushed Material – Albion Park Quarry' dated 10 August 2009 by Network Geotechnics

***Strike out as appropriate**

- 'Contamination Assessment of Stockpiled Material at Stockpile 1, Stockpile 2 and Stockpile 3, ILC @ Enfield, Cosgrove Road, Strathfield South, NSW' dated 23 September 2011 by Coffey.
- 'Assessment of Asbestos in Stockpiled Material at Stockpiles 1, 2, 2A and 3 ILC @ Enfield, Cosgrove Road, Strathfield South, NSW' dated 17 October 2011 by Coffey.
- 'Clarification to Coffey Reports Regarding Asbestos in Stockpiles 1, 2, 2A and 3 ILC @ Enfield, Cosgrove Road, Strathfield South, NSW' dated 27 October 2011 by Coffey.
- 'Factual Letter Report Virgin Excavated Natural Material Assessment Albion Park Quarry, Albion Park Rail' dated 28 October 2011 by Douglas
- 'Laboratory Quality System – Quality Assurance / Quality Controls' dated 6 June 2012 by Hibbs.
- 'Contamination Assessment of Stockpiled Material at ILC Enfield, Cosgrove Road, Strathfield South, NSW' dated 20 September 2012 by Coffey.
- 'Asbestos Impacted Materials Movement Summary Report December 2011 to April 2012 ILC Enfield' dated November 2012 by Hibbs.
- 'Materials Movement Summary Report for: Materials Relocated to Stockpile No. 4 and Asbestos Impacted Materials May to October 2012 ILC Enfield' dated February 2013 by Hibbs.
- 'Materials Movement Summary Report for: Materials Relocated to Stockpile No. 4 and Asbestos Impacted Materials November 2012 – April 2013 ILC Enfield' dated August 2013 by Hibbs.
- 'Materials Movement Summary Report for: Materials Relocated to Stockpile No.4 and Asbestos impacted materials May to December 2013 ILC Enfield' dated February 2014 by Hibbs.
- 'Confirmation of Removal of Stockpile No. 2 Materials from the Temporary Access Haul Road, ILC Enfield' dated 18 February 2014 by Coffey.
- 'Validation Report for Validation Area 5 (Proposed Lot 7, Lot 18, Part Lot 22 and Part Lot 4) for ILC @ Enfield, Enfield, NSW' dated 27 October 2014 by Coffey.
- 'Site Management Plan – Validation Area 5. Warehouse C, Administrative Area and Basin B Enfield Intermodal Logistics Centre' dated 6 November 2014 by NSW Ports.

Report reviewed during the previous stages of the Audit, referred to in the current Site Audit Report:

- 'Remediation Action Plan for Known Soil Contamination Intermodal Logistics Centre @ Enfield' dated 23 June 2009 by Coffey.

Reports reviewed during preparation of the Interim Advice Letter referenced below, include:

- 'Report on Phase 1 Contamination Assessment. Proposed Development Trinity Grammar School 119 Prospect Road, Summer Hill' dated July 2008 by Douglas Partners (Douglas).

****Strike out as appropriate***

- Draft 'Remediation Action Plan for Known Soil Contamination Intermodal Logistics Centre @ Enfield' dated 31 March 2009 by Coffey.
- 'Construction Environmental Management Plan Demolition and Remediation of the Intermodal Logistics Centre at Enfield – Stage 1B' dated 8 December 2008 by Enviropacific.
- Draft 'Remediation Action Plan for Known Soil Contamination Intermodal Logistics Centre @ Enfield' dated 13 May 2009 by Coffey.
- Draft 'SPC Contract 2008/2009: ILC at Enfield – Demolition and Remediation Sampling Analytical and Quality Plan Additional Groundwater Assessment' dated 1 June 2009 by Coffey.
- 'Remediation Action Plan for Known Soil Contamination Intermodal Logistics Centre @ Enfield' dated 3 June 2009 by Coffey.
- 'Remediation Action Plan for Known Soil Contamination Intermodal Logistics Centre @ Enfield' dated 23 June 2009 by Coffey.
- 'Additional Groundwater Assessment' dated 25 November 2009 by Coffey.
- 'Contamination Management Plan for Construction, ILC@ Enfield', 25 November 2009 by Coffey.
- 'Validation Report for Separable Portion 2, 3, 4 and 5 Intermodal Logistic Centre @ Enfield Volumes 1 to 3' dated as April 2010 and draft dated 19 January 2010 by Coffey.

Other information reviewed (including previous site audit reports and statements relating to the site)

- 'Summary Site Audit Report, Enfield Marshalling Yard' and Site Audit Statement GN-9, dated 20 September 1999, ENVIRON Australia (ENVIRON).
- 'Site Audit Report, Delec Depot, Enfield' and Site Audit Statement GN-34, dated January 2002, ENVIRON.
- Section B Site Audit Statement (GN 401-2A) dated 2 July 2009 and Section B Site Audit Statement (GN 401-3A) dated 4 November 2009, ENVIRON.
- Section B Site Audit Statement (GN 401-1A) dated 19 February 2009 and Section A Site Audit Statement (GN 401-1B) dated 27 August 2009, ENVIRON.
- Interim Advice Letter 'Implementation of Remedial Action Plan for Separable Portions 2, 3, 4 and 5. Intermodal Logistics Centre @ Enfield' dated July 2010, ENVIRON.
- Section A Site Audit Statement (GN 401-5B) dated December 2013, ENVIRON
- Section A Site Audit Report (GN 401-6B) dated August 2014, ENVIRON
- Section A Site Audit Report (GN 401-7B) dated October 2014, ENVIRON

Site audit report

Title: Site Audit Report – Proposed Lot 7, Lot 18, Part Lot 22 and Part Lot 4 Intermodal Logistics Centre at Enfield

Report no. GN 401-8B (ENVIRON Ref: AS120873)

Date: November 2014

**Strike out as appropriate*

PART II: Auditor's findings

Please complete either Section A or Section B, **not** both. (*Strike out the irrelevant section.*)

Use Section A where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land use(s).

Use Section B where the audit is to determine the nature and extent of contamination and/or the appropriateness of an investigation or remedial action or management plan and/or whether the site can be made suitable for a specified land use or uses subject to the successful implementation of a remedial action or management plan.

Section A

I certify that, in my opinion, the site is **SUITABLE** for the following use(s) (*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*)

subject to compliance with the following environmental management plan (*insert title, date and author of plan*) **in light of contamination remaining on the site:**

'Site Management Plan – Validation Area 5. Warehouse C, Administrative Area and Basin B Enfield Intermodal Logistics Centre' dated 6 November 2014.

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:

The site is part of a larger area being developed for use as a freight terminal. It was formerly part of a larger railway marshalling yard and Diesel Electric and Electric Locomotive Maintenance Centre. Soil may have some hydrocarbon and asbestos contamination from historic site activities as well as from subsequent waste dumping. Prior to redevelopment, there were a number of large soil stockpiles on the marshalling yard which contained asbestos contaminated material, principally as fragments of asbestos-containing material. Some material from these stockpiles was then used to raise site levels to facilitate the redevelopment however material with asbestos containing material has subsequently been excavated and removed from this site.

Remedial works included the capping of the site due to the potential for residual contamination.

An ongoing environmental management plan is to be implemented for these lots and requires that the current state of the site surfacing is maintained until the site is redeveloped for the proposed commercial activities. Long term site management will be required.

Section B

Purpose of the plan¹ which is the subject of the audit ...

I certify that, in my opinion:

- the nature and extent of the contamination HAS/HAS NOT* been appropriately determined

AND/OR

- the investigation/remedial action plan/management plan* IS/IS NOT* appropriate for the purpose stated above

AND/OR

- 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
- 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 remedial action plan/management plan* (insert title, date and author of plan)

...

subject to compliance with the following condition(s):

...

¹ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

* Strike out as appropriate

Overall comments

...

PART III: Auditor's declaration

I am accredited as a site auditor by the NSW Environment Protection Authority under the *Contaminated Land Management Act 1997* (Accreditation No. 9808).

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...

27/11/2014

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 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 contains the auditor's opinion of the suitability of the site for specified uses or of the appropriateness of an investigation, or remedial action or management plan which may enable a particular use. It sets out succinct and definitive information to assist decision-making about the use(s) of the site or a plan or proposal to manage or remediate the site.

The auditor is to complete either Section A or Section B of Part II, **not** both.

In **Section A** the auditor may conclude that the land is *suitable* for a specified use(s) 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 remediation or investigation of the site was needed to render the site fit for the specified use(s). Any **condition** imposed should be limited to implementation of an environmental management plan to help ensure the site remains safe for the specified use(s). The plan should be legally enforceable: for example a requirement of a notice under the *Contaminated Land Management Act 1997* (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*.

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.

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 whether land can be made suitable for a particular land use or uses upon implementation of a remedial action or management 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.

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.

In **Part III** the auditor certifies his/her 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:

EPA (NSW)

Contaminated Sites Section
PO Box A290, SYDNEY SOUTH NSW 1232
nswauditors@epa.nsw.gov.au

AND

the **local council** for the land which is the subject of the audit.