

# 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 31<sup>st</sup> October 2012. For more information about completing this form, go to Part IV.*

## PART I: Site audit identification

**Site audit statement no.** GN 401-5B

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 Lots 11, 12, 13, 16, 17, 23, 5 (see Attachment following Part 1) located over Part Lot 2 DP1006861 and Part Lot 14 DP 1007302

**Local Government Area:** Strathfield Municipal Council

**Area of site (e.g. hectares):** Approximately 27.17 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)

Bruce Royds 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).

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 Australia Pty Ltd (CH2M Hill).
- 'Spoil Management Procedures Bridge Footing Construction and North and South Rail Connections ILC @ Enfield' dated 8 April 2011 by Coffey .
- 'Spoil Management Plan for Reuse of Unsuitable Engineering Fill at Mt Enfield. Intermodal Logistics Centre at Enfield' dated 28 June 2011 by Coffey.

**\*Strike out as appropriate**

- 'Contamination Assessment of Stockpiled Material at Stockpile 5, ILC @ Enfield, Cosgrove Road, Strathfield South, NSW' dated 7 July 2011 by Coffey.
- '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.
- 'Confirmation of Movement of Contaminated Materials – Cell 1 to Cell 5, ILC Enfield, Cosgrove Road, Enfield NSW 2136' dated 15 February 2012 by Hibbs.
- 'ILC Enfield – Asbestos Containment Cell 2 Partial Relocation & Extension' dated 17 April 2012 by Enviropacific.
- 'Confirmation of Movement of Contaminated Materials – Cell 2 to Cell 6, ILC Enfield, Cosgrove Road, Enfield NSW 2136' dated 29 August 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.
- 'Baseline Contamination Assessment, Area G, Intermodal Logistics Centre, Cosgrove Road, Enfield NSW' dated 9 January 2013 by Coffey.
- 'Supplementary Baseline Contamination Assessment Area G, Intermodal Logistics Centre, Cosgrove Road, Enfield NSW' dated 17 October 2013 by Coffey (supersedes Coffey dated 9 January 2013).
- '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.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Empty Container Storage Area A' Final dated 22 October 2013 (and earlier drafts) by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Intermodal Terminal Area' Final dated 22 October 2013 (and earlier drafts) by NSW Ports.
- 'Baseline Contamination Assessment, Service Area and Shark Fin, Intermodal Logistics Centre, Cosgrove Road, Enfield NSW' dated 23 October 2013 by Coffey.

- 'Validation Report for Validation Area 1 (Proposed Lots 5, 11, 12, 13, 16, 17 and 23) for ILC @ Enfield, Enfield, NSW' ) dated 9 December 2013 (and draft dated 21 October 2013) by Coffey.

Report reviewed during the previous Audits, referred to in the current Audit:

- '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 Letters referenced below, include:

- 'Report on Phase 1 Contamination Assessment. Proposed Development Trinity Grammar School 119 Prospect Road, Summer Hill' dated July 2008 by Douglas.
- 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', dated 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.
- Letter 'SPC Contract 2008/09 ILC at Enfield – Demolition and Remediation Methodology for Removal of Asbestos Impacted Soils from Around the Footings at the WRS' dated 18 August 2010 by Coffey.
- Letter 'SPC Contract 2008/09 ILC at Enfield – Demolition and Remediation Removal of Asbestos Impacted Soils from Around the Footings at the WRS' dated 21 October 2010 by Coffey
- 'Confirmation of Movement of Contaminated Materials - Cell 2 to Cell 6, ILC Enfield, Cosgrove Road, Enfield NSW 2136' dated 17 October 2012 by Hibbs

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).

***\*Strike out as appropriate***

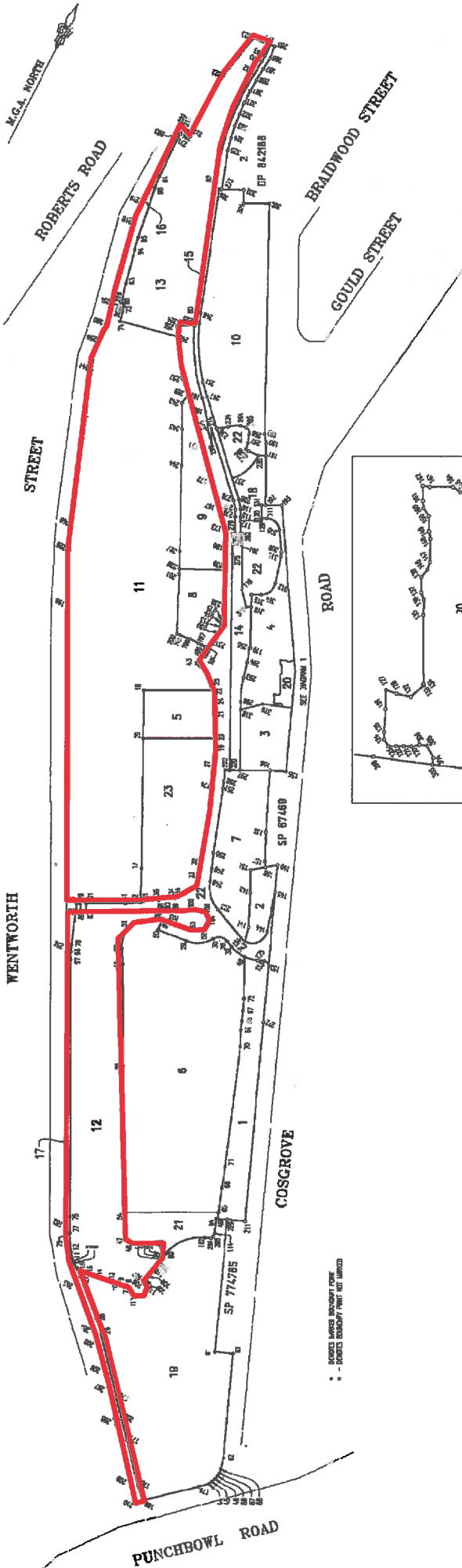
- 'Site Audit Report, Delec Depot, Enfield' and Site Audit Statement GN-34, dated January 2002, ENVIRON.
- Section B Site Audit Statement (GN 401-2A) dated 2 July 2009 and Section B Site Audit Statement (GN 401-3A) dated 4 November 2009, ENVIRON.
- Section B Site Audit Statement (GN 401-1A) dated 19 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.
- Interim Advice Letter 'Wagon Repair Shed Remediation, Intermodal Logistics Centre @ Enfield' dated 25 November 2010, ENVIRON.

**Site audit report**

Title: Site Audit Report – Proposed Lots 5, 11, 12, 13, 16, 17 and 23 Intermodal Logistics Centre at Enfield

Report no. GN 401-5 (ENVIRON Ref: AS120873)

Date: December 2013

[illegible][illegible][illegible]

## 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:**

- 'Enfield Intermodal Logistics Centre. Site Management Plan. Empty Container Storage Area A' Final dated 22 October 2013 by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Intermodal Terminal Area' Final dated 22 October 2013 by NSW Ports.

**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 site being developed for use as a freight terminal. It was formerly part of a railway marshalling yard. The marshalling yard included a rail wagon repair shed where activities since 1916 resulted in asbestos fibre contamination. Site soils also had some hydrocarbon and asbestos contamination from historic site activities as well as subsequent dumping. Prior to redevelopment, there were a number of large soil stockpiles on the site 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.

The remedial works included the placement of the asbestos fibre-contaminated material into purpose built encapsulation Containment Cells within proposed Lot 11, and the capping of potentially asbestos impacted material used as fill on proposed Lots 11, 12 and 16. Ongoing environmental management plans are to be implemented for these lots and require 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 plan<sup>1</sup> 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):**

...

---

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

**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...

9/12/2013

## 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.