

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 401-6B

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 6 - Warehouse Area A and Warehouse Area B; Proposed Lot 8 - Warehouse Area D; Proposed Lots 9 - Warehouse Area E; Proposed Lots 10 - Warehouse Area F; Proposed Part Lot 22 - Detention Basin F.

These Proposed Lots (see Attachment following Part 1) are located over current Part Lot 2 DP1006861, and Part Lot 14 DP 1007302.

Local Government Area: Strathfield Municipal Council

Area of site (e.g. hectares): Approximately 13.57 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]*)~~

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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).
- 'Crushed Material – Albion Park Quarry' dated 10 August 2009 by Network Geotechnics (VENM Report)
- 'Contamination Assessment of Stockpiled Material at Stockpile 5, ILC @ Enfield, Cosgrove Road, Strathfield South, NSW' dated 7 July 2011 by Coffey.

***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 Partners (VENM Report)
- Letter Re: 'Assessment of the Potential for Asbestos Impacted Material to Migrate Through Rw07 Gabion Wall or Drainage System' by Hibbs dated 4 July 2012.
- '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.
- 'Visual Inspection – Geofabric Covered Areas Southern End, Area F - ILC Enfield' dated 22 January 2013 by Hibbs.
- 'ULX Sed Basin 2 Stockpile Sampling 070213 ILC Enfield, 71-73 Cosgrove Road, Enfield, NSW' dated 22 March 2013 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.
- 'Confirmation of Movement of Contaminated Materials – Area F, Retention Pond to Extension of Area F Capped Area, ILC Enfield' dated 4 July 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.
- 'Confirmation of Placement of Stockpiled Materials WHD/E, ILC Enfield' dated 19 December 2013 by Hibbs.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Warehouses A & B' dated January 2014 by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Area D dated January 2014 by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Area E dated January 2014 by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Internal Roads and Basin F dated January 2014 by NSW Ports.

****Strike out as appropriate***

- 'Enfield Intermodal Logistics Centre. Site Management Plan. Area F dated January 2014 by NSW Ports
- 'Materials Movement Summary Report for: Materials Relocated to Stockpile No.4 and Asbestos impacted materials May to December 2013 ILC Enfield' dated February 2014.
- 'Confirmation of Removal of Stockpile No.2 Materials from the Temporary Access Haul Road, ILC Enfield' dated 18 February 2014.
- 'Validation Report Southern Area ILC Enfield, 71-73 Cosgrove Road, Enfield NSW' dated February 2014 by Hibbs.
- 'Validation Report for Validation Area 4 (Proposed Lots 6, 7, 8, 10, Portion of PT22) for ILC @ Enfield, Enfield, NSW') Draft dated 15 April 2014 by Coffey.
- 'Validation Report for Validation Area 4 (Proposed Lots 6, 7, 8, 10, Portion of PT22) for ILC @ Enfield, Enfield, NSW') Final dated 6 August 2014 by Coffey ('the validation report')

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 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).(Summer Hill VENM Report)
- 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.

****Strike out as appropriate***

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.

Site audit report

Title: Site Audit Report – Proposed Lots 6, 8, 9, 10 and Portion PT22 Intermodal Logistics Centre at Enfield

Report no. GN 401-6B (ENVIRON Ref: AS120873) Date: August 2014



POINTS MARKED THROUGHOUT THE SITE

• - POINTS MARKED THROUGHOUT THE SITE

No.	EASTING	NORTHING	No.	EASTING	NORTHING	No.	EASTING	NORTHING	No.	EASTING	NORTHING
1	527281.4	6247242.2	11	527281.4	6247242.2	21	527281.4	6247242.2	31	527281.4	6247242.2
2	527281.4	6247242.2	12	527281.4	6247242.2	22	527281.4	6247242.2	32	527281.4	6247242.2
3	527281.4	6247242.2	13	527281.4	6247242.2	23	527281.4	6247242.2	33	527281.4	6247242.2
4	527281.4	6247242.2	14	527281.4	6247242.2	24	527281.4	6247242.2	34	527281.4	6247242.2
5	527281.4	6247242.2	15	527281.4	6247242.2	25	527281.4	6247242.2	35	527281.4	6247242.2
6	527281.4	6247242.2	16	527281.4	6247242.2	26	527281.4	6247242.2	36	527281.4	6247242.2
7	527281.4	6247242.2	17	527281.4	6247242.2	27	527281.4	6247242.2	37	527281.4	6247242.2
8	527281.4	6247242.2	18	527281.4	6247242.2	28	527281.4	6247242.2	38	527281.4	6247242.2
9	527281.4	6247242.2	19	527281.4	6247242.2	29	527281.4	6247242.2	39	527281.4	6247242.2
10	527281.4	6247242.2	20	527281.4	6247242.2	30	527281.4	6247242.2	40	527281.4	6247242.2

BOUNDARY SET MARKS

No.	EASTING	NORTHING	No.	EASTING	NORTHING	No.	EASTING	NORTHING	No.	EASTING	NORTHING
101	527281.4	6247242.2	101	527281.4	6247242.2	201	527281.4	6247242.2	301	527281.4	6247242.2
102	527281.4	6247242.2	102	527281.4	6247242.2	202	527281.4	6247242.2	302	527281.4	6247242.2
103	527281.4	6247242.2	103	527281.4	6247242.2	203	527281.4	6247242.2	303	527281.4	6247242.2
104	527281.4	6247242.2	104	527281.4	6247242.2	204	527281.4	6247242.2	304	527281.4	6247242.2
105	527281.4	6247242.2	105	527281.4	6247242.2	205	527281.4	6247242.2	305	527281.4	6247242.2
106	527281.4	6247242.2	106	527281.4	6247242.2	206	527281.4	6247242.2	306	527281.4	6247242.2
107	527281.4	6247242.2	107	527281.4	6247242.2	207	527281.4	6247242.2	307	527281.4	6247242.2
108	527281.4	6247242.2	108	527281.4	6247242.2	208	527281.4	6247242.2	308	527281.4	6247242.2
109	527281.4	6247242.2	109	527281.4	6247242.2	209	527281.4	6247242.2	309	527281.4	6247242.2
110	527281.4	6247242.2	110	527281.4	6247242.2	210	527281.4	6247242.2	310	527281.4	6247242.2

CONSULTING SURVEYORS

MAID 1-3000

DATE 27.11.2013

DENNY LINKER & CO.

SYDNEY

110 Floor 17 BARDOUR STREET

DUNN HILLS N.S.W. 2816

PH. (02) 9414-4019 FAX (02) 9414-2324

WT. 102275

REG. NO. 102275

PLAN SHOWING MGA COORDINATES OF BOUNDARIES MARKED AND NOT MARKED AT INTERMEDIAL TERMINAL SITE COSGROVE ROAD ENFIELD

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. Warehouses A & B' dated January 2014 by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Area D dated January 2014 by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Area E dated January 2014 by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Internal Roads and Basin F dated January 2014 by NSW Ports.
- 'Enfield Intermodal Logistics Centre. Site Management Plan. Area F dated January 2014 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 including capping of potentially asbestos impacted material (some imported for use as fill) on proposed lots 6, 8, 9, 10 and PT22 and the placement of the asbestos impacted material into purpose built encapsulation Containment Cells within proposed Lot 10.

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 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...

29/8/2014

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.