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 26 March 2009. For more information about completing this form, go to Part IV.

PART I: Site audit identification

Site audit statement no. GN 401-3A

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, NSW

Postcode: 2136

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

Part Lot 101 DP 1001498 (Shown as SP5 on attachment at the end of Part 1 of this

statement)

Local Government Area:

Strathfield Local Government Area

Area of site (e.g. hectares): 0.5 ha (approximately)

Current zoning:

Special Uses - 5b (Railways)

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

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Site audit commissioned by

Name: Christa Sams Company: Sydney Ports Corporation

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 9296 4999

Purpose of site audit

→ A. To determine land use suitability (please specify intended use(s))

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])

Railway

Information sources for site audit

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

Coffey Environments Pty Ltd (Coffey).

Title(s) of report(s) reviewed:

- Draft 'Remediation Action Plan for Known Soil Contamination Intermodal Logistics Centre @ Enfield' dated 31 March 2009 by Coffey Environments Ptv Ltd (Coffey).
- 'Construction Environmental Management Plan Demolition and Remediation of the Intermodal Logistics Centre at Enfield – Stage 1B' dated 8 December 2008 by Enviropacific Services (referred to as CEMP)
- Draft 'Remediation Action Plan for Known Soil Contamination Intermodal Logistics Centre @ Enfield' dated 13 May 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.

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.

^{*} Strike out as appropriate

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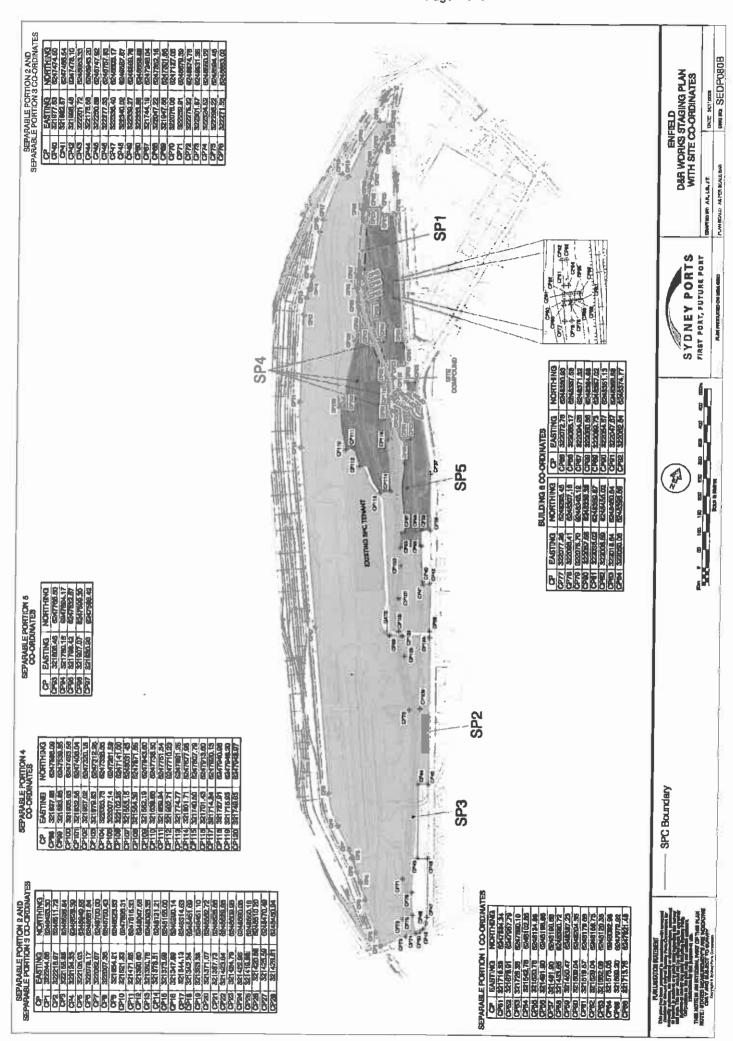
 'Site Audit Report, Delec Depot, Enfield' and Site Audit Statement GN34 dated January 2002.

Site audit report

Title: Site Audit Report – Remediation Action Plan, Intermodal Logistics Centre @ Enfield

Report no. GN 401-2A (Environ Ref: AS120873) Date: July 2009

^{*} 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

| | l certif | y that, in my opInion, the site is SUITABLE for the following use(s) (tick all riate 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) |
| | (insert t | t to compliance with the following environmental management plan little, date and author of plan) in light of contamination remaining on the |
| OR | | |
| | certify | that, in my opinion, the site is NOT SUITABLE for any use due to the harm from contamination. |
| Øverall | comme | ents |
| ******** | | |
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Section B

Purpose of the plan¹ which is the subject of the audit is: *To remediate areas containing unacceptable levels of contamination such that human health risks are reduced to acceptable levels commensurate with the proposed land use (commercial/industrial).*

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|-------|----------|--|--|--|--|--|--|
| certi | fy tł | hat, in my opinion: | | | | | |
| ✓ | | the nature and extent of the contamination HAS/HAS NOT* been appropriate determined | | | | | |
| AND/ | OR. | | | | | | |
| ✓ | | the investigation/remedial action plan/management plan* IS/IS NOT* appropriate for the purpose stated above | | | | | |
| AND/G |)R | | | | | | |
| ✓ | th an | site CAN BE MADE SUITABLE for the following uses (tick all appropriate use 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 | | | | | |

if the site is remediated/managed* in accordance with the following remedial action plan/management plan* (insert title, date and author of plan)

'Remediation Action Plan for Known Soil Contamination Intermodal Logistics Centre @ Enfield' dated 23 June 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 Services.

subject to compliance with the following condition(s):

☐—Park, recreational open-space, playing field

☑ Commercial/industrial

A Site Audit Statement certifying suitability is prepared at the successful completion of remediation.

A suitable long term Environmental Management Plan is prepared and implemented.

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

The Validation Report must include the following:

- Details on the extent of the UST excavation, how this was determined (i.e visual validation, odours, PID readings), sufficient validation results (including VOCs) and tank disposal documentation.
- Observations of the soil following removal of the building footprints and the process by which validation samples were selected.
- Details on how the ballast was prepared (i.e. cleaned) and validated for reuse on-site.
- A discussion on the homogeneity, the sources and the validation sample densities for fill re-used on-site. Where ash is to be used as clean capping, adequate validation will be required.
- Adequate documentation for any imported materials and a commensurate sample density.
- The location and final design of the containment cell (including drainage and compaction of the base).
- A survey of the position and thickness of the cap (cell and SP4).
- Demonstration that the containment cell into which leachable material is placed is adequate to minimise leachate formation in the long-term.
- Confirmation from the culvert owner regarding maintenance requirements to ensure the long term integrity of the cell constructed above it.
- Reference to a realistic and enforceable EMP that provides commensurate management of risk given the remedial works undertaken.

The risk of migration of contaminants to groundwater has been fully assessed and no further on-site groundwater management or remediation is required.

Overall comments

The site was formerly used as a rail yard and as a maintenance centre which resulted in the contamination of soil by long chain petroleum hydrocarbons, asbestos and some heavy metals. The site is now being redeveloped for use as an Intermodal Logistics Centre.

The remediation action plan requires excavation of contaminated soil with retention in constructed containment cells or capping the contaminated soil in situ. As contamination will remain on site, a long term environmental management plan will be required to be prepared and implemented following remediation.

The Site Audit Report (GN401-2A) that covers the area of this Statement was issued in July 2009. Due to an oversight, one of the part Lots that comprise the site was omitted from the property description. This Site Audit Statement GN401-3A is issued to correct that oversight.

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 | 2 | X | and | Date | 41 | n | 2009 |
|--------|---|---------------|-----|------|----|---|------|
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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:

Department of Environment and Conservation (NSW)

Contaminated Sites Section PO Box A290, SYDNEY SOUTH NSW 1232

Fax: (02) 9995 5930

AND

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