

16 June 2023

SCL220020.02

Tim Doman
Project Manager – Environmental Remediation
ARTC
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By email: TDomain@artc.com.au

Dear Tim

Subject: IAA#2 Site Auditor Review of Cavvanba 2023 'Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580'

1 INTRODUCTION

Mr Brad May, a NSW EPA accredited Contaminated Site Auditor (auditor) under the Contaminated Land Management Act 1997 (CLM Act) (Accreditation Number 1603) and an employee of Epic Environmental Pty Ltd (Epic) was commissioned by the Australian Rail Track Corporation (ARTC) on 31 October 2022 to carry out a site contamination audit (site audit) in relation to the site known as the Goulburn Wheat Yards, located off Sloane Street, Goulburn NSW 2580 (herein known as the site).

The purpose of this Interim Audit Advice (IAA) #2 is to provide auditor comment following review of the Interim Environmental Management Plan (Interim EMP), prepared by Cavvanba dated 30 May 2023, Ref: 21075_R03_IEMPv3.

The auditor has previously prepared IAA#1 (8/12/2022), which included site visit and walkover and review of available recent and historical site investigation reports covering the various sub-areas of the site. Detailed site identification and description of the site is presented in IAA#1.

The auditor notes that as an interim plan, the EMP has not been prepared to meet all information requirements for environmental management plans as specified by NSW EPA (2020) 'Consultants reporting on contaminated land'. Therefore, this review has been carried out considering reasonable environmental management practices to meet the stated EMP objectives, as well as structure and ease of use.

Auditor comments on the draft IEMP (January 2023) were provided in a letter dated 15 February 2023. The auditor considers that these comments have been satisfactorily addressed and that the Interim EMP (v3, dated 30 May 2023) may be considered final. Closed out auditor comments are provided in the attached updated comments register.

However, the auditor notes that the IEMP should be updated should site contamination information be obtained indicating additional hazards requiring additional contamination controls are required. The auditor understands that the EMP is interim in nature and is intended to be updated to a long-term EMP meeting NSW EPA guidelines following supplementary detailed site investigation expected within the next 6 to 12 months.

Should you have any questions regarding the above comments, please contact Gary Bagwell or Brad May.

Yours sincerely



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For,

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Attached: Goulburn Wheat Yards comment register 16 June 2023

Comments Sheet

Project: Goulburn Wheat Yards
 Document: IEMP
 Version:
 Package Ref:
 Comments Sheet Issu 23/06/2023

Item	Document Title	Doc Rev No.	Reference Page #, Para #, DRG #	Organisation	Section/ Dept.	Name	Comment Date	Comment	Contractor			TNSW Auditor			Contractor		
									Response By	Response Date	Response/Action for Resolution	Closed?	Date	Notes	Response By	Response Date	Response/Action for Resolution
1	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580	Ref 21075 R03	General	TNSW	Health and Safety	C Simpson	3/03/2023	The IEMP is providing instruction on the management of risks to workers. The references section makes no reference to the WHS Act, Regulation and relevant Codes of Practice. The controls identified do not come with a supporting risk assessment, they also do not appear to link to any WHS legislative or other requirements. There is no evidence to show that an Occupational Hygienist has provided guidance on the control measures. Further specifics are called out below.	Drew Wood / Ben Wackett	8-Mar-23	Noted. Reference to the WHS Act and Regulation has been included in Section 7. As per ARTC's advice, the management plan was intended to be a succinct, tabulated document that was easy for rail personnel to interpret. It was also interim and not intended to be in strict accordance with the requirements set out within NSW EPA guidelines.	Open	24-4-2023	The reference to the WHS Act is not included in Section 9 "References" of the attached document. It is noted that there is a reference to the WHS Regulation in Section 5 "Hazard Identification".	Drew Wood	30-May-23	Apologies, updated.
2	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580	Ref 21075 R03	4	TNSW	Health and Safety	C Simpson	3/03/2023	Many of the control measures state "avoid" such as avoid chewing gum. The control measures must be prescriptive and not contain ambiguity.	Drew Wood / Ben Wackett	8-Mar-23	Updated. "Avoid" has been replaced with "do not".	Closed	24-4-2023				
3	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580	Ref 21075 R03	4	TNSW	Health and Safety	C Simpson	3/03/2023	There is a need to where high visibility long clothing as PPE. Then the control measure for decontamination is to remove the clothing prior to leaving the area. This is not achievable.	Drew Wood / Ben Wackett	8-Mar-23	To make this achievable, decontamination includes: The Purpose built facilities are to be implemented during lead risk works which provide clean and dust free areas for crib rooms, toilet facilities and decontamination areas, laundering and appropriate disposal of gloves, masks, coveralls, etc.	Closed	24-4-2023				
4	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580	Ref 21075 R03	4	TNSW	Health and Safety	C Simpson	3/03/2023	There is mention of lead risk works. The control measures post this statement do not align with the WHS Regulation for lead risk works and are missing several requirements. ARTC are applying lead risk controls in this instance for any works in the wheat yards heavily impacted zones, as such this item needs to remain.					Noted				
5	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580	Ref 21075 R03	5	TNSW	Health and Safety	C Simpson	3/03/2023	There is a statement "lawn cutting height is to be set as high as reasonably practicable, ensuring no disturbance of bare ground (i.e. scalping)". I would expect that the IEMP would state what the height would be. Cavanba needs to make an assessment of what the height would be as a minimum to ensure that the controls are effective.	Drew Wood / Ben Wackett	8-Mar-23	Stating a site specific lawn cutting height which is protective in all situations would require trials and testing which is beyond the scope of this document. This IEMP is not designed to be prescriptive and relies on the transfer of information to the workers and managers to include when developing their work methodologies to meet the desired outcome, being minimal dust and no soil disturbance. This IEMP does not preclude ARTC prescribing a lawn cutting height.	Open	24-4-2023	If testing and trials are required, how will ARTC be able to set up the transfer of knowledge to their workers on what the minimum height will be?	Tim Doman	31-May-23	ARTC typically spray this area rather than undertake mowing. If mowing is undertaken this will be managed by ARTC internally with guidance from the IEMP. ARTC are comfortable with the controls specified in this document
6	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580	Ref 21075 R03	5	TNSW	Health and Safety	C Simpson	3/03/2023	Excavation work has been "defined as lead risk work" by Cavanba. This is not in compliance with the WHS Regulation c394. For the work to be lead risk work it must be a lead process. A lead process is defined in c392. As a result the excavation work is and should not be classified as lead risk work. ARTC are applying lead risk controls in this instance for any works in the wheat yards heavily impacted zones. Whilst not strictly defined, if there is a risk of WES standards being exceeded it could still trigger. Happy to make this more ambiguous noting that ARTC are applying lead risk work controls regardless.					Noted				
7	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580	Ref 21075 R03	5	TNSW	Health and Safety	C Simpson	3/03/2023	It is stated that "An assessment will be undertaken by a duly qualified professional experienced in contaminated land management and ARTC, and in accordance with the ARTC Lead Management Procedure (COR-PR-030)". This requirement is incorrect, the contaminated land management professional does not meet the requirements of an occupational hygienist and as such is not the correct person to be providing advice on work health and safety matters. Happy to specify occ hygienist as well.	Drew Wood / Ben Wackett	8-Mar-23	Updated.	Closed	24-4-2023				
8	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings, Off Sloane Street, Goulburn NSW 2580	Ref 21075 R03	6	TNSW	Health and Safety	C Simpson	3/03/2023	The requirements for stockpile management is clearly something that should be within the IEMP.	Drew Wood / Ben Wackett	8-Mar-23	Agreed. This was previously included in the Section titled: Contaminated material management and stockpiling. This has also been included as a highlight in Section 6.	Closed	24-4-2023				
1	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided		TNSW	E&S	J Peart	2/06/2023	Please provide document control and revision details in the plan	Drew Wood / Ben Wackett	8-Mar-23	Noted, updated.	Closed	2/05/2023				
2	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Section 5	TNSW	E&S	J Peart	2/06/2023	The text reads "Whilst PCB, TRH and B(a)P contamination in soil on site has been identified, Cavanba considers that these issues can be addressed in parallel with the management of lead and asbestos". In the intent of this sentence that no additional controls are required for the management of PCBs, TRH and BaP? If so please provide a rationale for this.	Drew Wood / Ben Wackett	8-Mar-23	Cavanba has updated this in line with the below auditors comments. The contamination is widespread and not sufficiently delineated to allow confident demarcation. Therefore the site is being treated as a whole. To prevent incidental dust generation and migration, the site must be treated as an exclusion zone, meaning controlling access and restricting vehicle and plant movements to sealed areas. For unsealed areas, the application of dust suppression techniques through the use of a water cart and / or a polymer sealants must be applied.	Closed	2/05/2023				
3	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Section 6	TNSW	E&S	J Peart	2/06/2023	The text reads "The main route of human exposure is via inhalation and ingestion of lead particulates (dust)", is there a report or research that supports this conclusion? If not, include controls for all plausible exposure pathways until such time as they are confirmed to be incomplete or insignificant. Consider ecological exposure pathways in addition to human, noting that there are controls recommended to prevent offsite migration of contamination.	Drew Wood / Ben Wackett	8-Mar-23	This section has been reworded. Ecological receptors have also been considered to prevent off-site migration of contamination.	Closed	2/05/2023				
4	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Section 8	TNSW	E&S	J Peart	2/06/2023	The text reads "This plan should be reviewed: - during any proposed works" Please elaborate on this. What kind of works would trigger a formal revision of the IEMP, and should this occur prior to commencement of the works?	Drew Wood / Ben Wackett	8-Mar-23	Noted, updated.	Closed	2/05/2023				
5	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Table 11: Information management – Contamination awareness	TNSW	E&S	J Peart	2/06/2023	Consider whether contaminants in addition to lead and asbestos require management / awareness	Drew Wood / Ben Wackett	8-Mar-23	As per the above comments, these have now been included.	Closed	2/05/2023				
6	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Table 11: Information management – Contamination awareness	TNSW	E&S	J Peart	2/06/2023	The wording in the second bullet point does not flow - please check the wording.	Drew Wood / Ben Wackett	8-Mar-23	Updated	Closed	2/05/2023				
7	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Table 11: Information management – Contamination awareness	TNSW	E&S	J Peart	2/06/2023	Do 'subsurface activities' include surface soil disturbance? This will be where the highest concentrations will likely be found.	Drew Wood / Ben Wackett	8-Mar-23	Updated	Closed	2/05/2023				
8	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Table 11: Information management – Housekeeping and exposure abatement	TNSW	E&S	J Peart	2/06/2023	Exclusion zones – Restricting access and movement - recommend including a figure which shows the area that requires exclusion rather than relying on the reader to interpret "widespread lead contamination"	Drew Wood / Ben Wackett	8-Mar-23	The management plan is only interim and is in place until there are more permanent measures that demonstrates that the site is suitable for its intended use. It is more appropriate to apply a broad restriction across the entirety of Area B and Area E. Hatching areas or identifying areas requiring exclusion can give a false impression that there has been a high degree of delineation which is not necessarily the case, particularly for Area B. Given the plan is interim, it errs on the side of caution and is purposely uncomplicated to ensure its usability.	Closed	2/05/2023				
9	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Table 11	TNSW	E&S	J Peart	2/06/2023	Have the nominated environmental management procedures been prepared in the context of some particular activities / works? I.e. are the "Pre-commencement activities" those activities intended to occur before "subsurface activities"? If so, should the awareness and exclusion controls apply to day to day works on the site also?	Drew Wood / Ben Wackett	8-Mar-23	The management procedures have been prepared to apply to broad activities likely to be completed on-site. Confirmation should be sought from ARTC representatives regarding whether the works will disturb or impact contamination. Pre-commencement activities are intended for any works prior to commencement. This has been made clearer in the plan.	Closed	2/05/2023				
10	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Table 11 - Housekeeping and exposure abatement	TNSW	E&S	J Peart	2/06/2023	All risk controls should be "SMART" actions that are phrased so as to avoid uncertainty. For instance the control "Purpose built facilities are to be considered during lead risk works" should be definitive. This control should be either mandatory, or (if there is uncertainty as to whether the control is required) it should be phrased subject to some kind of expert advice or assessment. The current wording leaves it open to interpretation by persons unknown.	Drew Wood / Ben Wackett	9-Mar-23	Agree, updated.	Closed	2/05/2023				
11	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Table 11 - Excavation	TNSW	E&S	J Peart	2/06/2023	Excavation - per comment 8, areas of widespread lead contamination should be defined and depicted on figures).	Drew Wood / Ben Wackett	9-Mar-23	This has been updated to be specific to Area B and Area E only. Refer to above comment.	Closed	2/05/2023				
12	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	Not provided	Table 11 - Stockpiling	TNSW	E&S	J Peart	2/06/2023	Control measures are listed for stockpiles themselves, do the disturbed surface soils require controls?	Drew Wood / Ben Wackett	9-Mar-23	Yes, Cavanba has updated the table to include active controls for the management of unstable surface soils.	Closed	2/05/2023				
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	1.0 Objective of the EMP	Epic	Auditor		15/02/2023	While asbestos and lead are the predominant contaminants in soils, the IEMP objective should address all contaminants in soils.	Drew Wood / Ben Wackett	20/3/23	Noted, updated.	Closed	16/06/2023				
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	2.0 Site Details	Epic	Auditor			Include details regarding stratification of the site (Areas A to F) and reference to Figure 2.	Drew Wood / Ben Wackett	20/3/23	Updated	Closed	16/06/2023				
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	5.0 Contamination Status	Epic	Auditor			1st para: "Lead contamination extends laterally for approximately 1.3 kilometres (km), with a maximum detected concentration of 193,000 mg/kg" – not sure what is meant by "extends laterally", can this be reworded. Note that lead contamination is generally at the surface in unstable soils.	Drew Wood / Ben Wackett	20/3/23	Updated	Closed	16/06/2023				
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	5.0 Contamination Status	Epic	Auditor			1st para: "Lead exceedances are represented by either orange or red location markers on Figures 3a to 3f or pink on QHD Figure 3". Suggest that the EMP would be improved if the figures contained hatched areas signifying areas requiring management for lead.	Drew Wood / Ben Wackett	20/3/23	The management plan is only interim and is in place until there are more permanent measures that demonstrates that the site is suitable for its intended use. It is more appropriate to apply a broad restriction across the entirety of Area B and Area E. Hatching areas or identifying areas requiring exclusion can give a false impression that there has been a high degree of delineation which is not necessarily the case, particularly for Area B. Given the plan is interim, it errs on the side of caution and is purposely uncomplicated to ensure its usability.	Closed	16/06/2023	This suggestion was more related to the graphical presentation of information, not the information itself. Conservatism may still be displayed in hatching.			
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	5.0 Contamination Status	Epic	Auditor			2nd para: Auditor notes that the possible presence and extent of friable asbestos in soils has not at this stage been established. Need to note this, and that EMP assumes the potential presence of friable asbestos forms (worst case for management purposes).	Drew Wood / Ben Wackett	20/3/23	Based on previous Auditor comments, it is understood that this refers to free fibres accumulated in soils as a result of brake pad wear. Cavanba does not consider this to be a plausible source of friable asbestos in soils at the site, and it suggests the entire corridor should be assumed worst case scenario. The transient nature of the historical use and lack of evidence of brake cleaning or maintenance in this site further supports Cavanba's assessment a friable source has not been previously identified.	Closed	16/06/2023	Auditor: The auditor notes that no testing for asbestos has been carried out apart from asbestos determinations in ACM fragments and that potential asbestos in soils associated with historical railway and industrial activities, including materials equipment used in railroad industry, disposal of asbestos wastes or weathering breakdown of significant quantities of ACM previously observed on site has not been excluded.	Drew Wood	30/05/2023	Please refer to previous comment.
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	5.0 Contamination Status	Epic	Auditor			4th para: Note this paragraph is redundant, as exposure routes for TRH and PCB contamination in soils are same as for asbestos lead and that management procedures should address all contamination.	Drew Wood / Ben Wackett	20/3/23	Noted, removed.	Closed	16/06/2023				
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	6.0 Potentially sensitive receptors and exposure scenario	Epic	Auditor			Third dot point: include 'and commercial'	Drew Wood / Ben Wackett	20/3/23	Noted, updated.	Closed	16/06/2023				
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	6.0 Potentially sensitive receptors and exposure scenario	Epic	Auditor			Include environmental receptor: offsite drainage gullies and Mulwaree River to the east of the site.	Drew Wood / Ben Wackett	20/3/23	Noted, updated.	Closed	16/06/2023				

Comments Sheet

Project: Goulburn Wheat Yards
 Document: IEMP
 Version:
 Package Ref:
 Comments Sheet Issu: 23/06/2023

Item	Document Title	Doc Rev No.	Reference Page #, Para #, DRG #	Organisation	Section/ Dept.	Name	Comment Date	Comment	Contractor			TfNSW Auditor			Contractor			
									Response By	Response Date	Response/Action for Resolution	Closed?	Date	Notes	Response By	Response Date	Response/Action for Resolution	
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	7.0 Notification and enforceability	Epic		Auditor		Party: ARTC – Site occupier - Does this mean ARTC? Auditor considers this should state the party who is responsible for management of the site (including any lessees). Can this be more specific? If possible, include contact details of ARTC officer responsible for plan implementation.	Drew Wood / Ben Wackett	203/23	There are no tenants for this site and given the contamination status, unlikely to be in the future. Cavanba was informed by ARTC to include the ARTC generic entroline as responsibilities change.	Closed	16/06/2023					
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	7.0 Notification and enforceability	Epic		Auditor		Include in first line, and implementation of this IEMP.	Drew Wood / Ben Wackett	203/23	Noted, updated.	Closed	16/06/2023					
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	7.0 Notification and enforceability	Epic		Auditor		Include Party, Contractors – undertaking site works. Responsible for updating their own safety documentation and managing health and safety risks in response to the contamination hazards identified in this plan, meeting the requirements of the Work Health and Safety Act 2011 and Work Health and Safety Regulation 2017.	Drew Wood / Ben Wackett	203/23	Noted, updated.	Closed	16/06/2023					
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	7.0 Notification and enforceability	Epic		Auditor		Record keeping - last para – this statement should be in Section 7.0.	Drew Wood / Ben Wackett	203/23	Noted, updated.	Closed	16/06/2023					
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	New section	Epic		Auditor		Include list of site activities that are envisioned to be carried out on site (e.g. waste removal, asbestos removal, grounds maintenance and management, civil works?)	Drew Wood / Ben Wackett	203/23	The plan is interim and has been prepared in a manner that it can apply to a broad range of activities, however must consider the management procedures in Section 11. Cavanba considers that by adding this section, it could imply limitations on when to consider this IEMP, and therefore has not been included.	Open	16/06/2023	Auditor: Whether interim or not, plan should be clear with regard to applicability. For example, would expect this plan would not be applicable to remediation or civil construction works, which would require project specific EMP. Suggest that as a site management plan, would be applicable to site grounds maintenance, including minor waste management? Please consider.	Drew Wood	30/05/2023	Please refer to previous comment.	
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	New section	Epic		Auditor		Include list of stakeholders who will be notified of the plan and any changes to the plan (e.g Local council, NSW EPA, TfNSW).	Drew Wood / Ben Wackett	203/23	Other key stakeholders have been listed within Section 7 - notification. Council are not considered to be a key stakeholder for the interim management plan.	Open	16/06/2023	Auditor: then could be more explicit. Suggest change 'Party' to 'Stakeholder', in Section 7.	Drew Wood	30/05/2023	Please refer to previous comment.	
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	Information Management - Contamination awareness: 1. Pre-commencement activities	Epic		Auditor		First line, suggest: Prior to any works commencing, confirmation must be sought from ARTC environmental representatives regarding whether proposed works will disturb or impact contamination.	Drew Wood / Ben Wackett	203/23	Noted, updated.	Closed	16/06/2023					
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	Housekeeping and exposure abatement: 1. Pre-commencement activities	Epic		Auditor		2nd para: Include - Areas of widespread lead, hydrocarbon (TRH/ PCB) and asbestos contamination as presented on Figures 3a to 3f and GHD Figure 3, are to be demarcated as an exclusion zone with appropriate signage. These areas must not be used as trafficked thoroughfares and shall only be accessed by persons inducted into this plan.	Drew Wood / Ben Wackett	203/23	Noted, updated.	Closed	16/06/2023		Drew Wood	30/05/2023	This section was updated to reflect the Auditor's comments, however appears to have been superseded through addressing TfNSW comments. I have further updated this section to consolidate the Auditor's comments.	
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	Site maintenance: 2. Site maintenance activities	Epic		Auditor		*Application of dust suppressants such as water (watercart) on disturbed surfaces, vehicle routes, stockpiles and excavations, etc. The use of polymer-based dust suppressants are to be considered, where required. *Minimise travel speeds and distances within contaminated areas.	Drew Wood / Ben Wackett	203/23	Noted, updated.	Closed	16/06/2023					
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	Excavation: 3. Intrusive activities	Epic		Auditor		First para: Include - All excavation activities to be undertaken within areas of widespread lead and asbestos contamination, as presented on Figures 3a to 3f and GHD Figure 3, will likely be defined as lead and/or asbestos risk work. An assessment will be undertaken by a duly qualified professional experienced in contaminated land management and ARTC, and in accordance with the ARTC Lead and Asbestos Management Procedure (COR-PR-030).	Drew Wood / Ben Wackett	203/23	ARTC procedure COR-PR-030 is a lead-specific procedure, it is not an asbestos procedural document. I have included a bullet point stating that pre works asbestos inspections and clearances must be completed.	Closed	16/06/2023		Drew Wood	30/05/2023	Please refer to previous comment.	
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	Contamination soil management: 3. Intrusive activities	Epic		Auditor		Include: Prior to intrusive activities in asbestos contaminated areas, removal and disposal by handpicking of surficial ACM materials are to be carried out followed by surface clearance (reason: to avoid breaking up /degradation and mixing of ACM which is largely surface based)	Drew Wood / Ben Wackett	203/23	Noted, updated.	Closed	16/06/2023					
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	Offsite migration prevention: 4. Off-site migration mitigation measures	Epic		Auditor		2nd para: Include - prevent incidental dust generation and migration, areas of widespread lead, asbestos and hydrocarbon (TRH/ PCB) contamination must be demarcated as an exclusion zone as outlined above, meaning restricting access and movements within this area.	Drew Wood / Ben Wackett	203/23	Noted, updated.	Closed	16/06/2023					
	Interim Environmental Management Plan – Goulburn Wheat Yard Sidings	21075_R03 v3	Offsite migration prevention: 4. Off-site migration mitigation measures	Epic		Auditor		Erosion and sediment control: Include - The application of appropriate erosion, sediment and water management controls (see Landcom (2004) Managing Urban Stormwater: Soils and Construction) must be implemented and maintained on the site. should the discharge of contaminated soils be an issue for the site. The routine removal of all grit and sediment from stormwater drains is recommended and must be undertaken and maintained through monthly inspections and following rainfall events of > 10 mm in a 24 hour period.	Drew Wood / Ben Wackett	203/23	Noted, updated. Please note that Cavanba have removed the rainfall trigger, as it is more appropriate and practical to complete these inspections on a regular, monthly basis.	Closed	16/06/2023					