

23 June 2023

Ref: SCL220026.01

Kimberley Purkiss
Environment Manager - M12 Motorway West
CPB Georgiou
at 1953 Elizabeth Drive, Badgerys Creek, NSW 2555, Australia
Kimberley.Purkiss@cpbggjv.com.au

Subject: Interim Audit Advice (IAA) #3 for Statutory Site Audit 2023/SY031. Endorsement of Contaminated Soil RAP and Encapsulation

The CPB Georgiou Joint Venture (CPBG JV) have engaged Brad May as the NSW EPA Contaminated Site Auditor to satisfy the requirement of the Infrastructure Approval under section 5.19 of the Environmental Planning and Assessment Act (1979) referred to as the State Significant Infrastructure (SSI) 9364 conditions of approval E87 and E88.

Condition E87 required that should remediation be required to make the land suitable for the intended use, the Proponent must submit a Remediation Action Plan (RAP) prior to commencing the remediation. The RAP must be accompanied by a certification by a NSW EPA accredited contaminated site auditor in the form of an Interim Audit Advice (IAA) or a Section B Site Audit Statement.

1 IAA PURPOSE

This IAA provides the CPBG JV with interim advice as part of statutory site audit No. 2023/SY031 – M12 West, being undertaken by Brad May, a NSW EPA Site Auditor accredited under the Contaminated Land (CLM) Management Act. The advice forms part of the statutory site audit for the M12 West project¹.

This IAA specifically provides the Auditor's endorsement of the WSP document titled:

- Sydney Environmental (2023), 'Remediation Action Plan, M12 Motorway Alignment, Badgerys Creek, NSW report No. 1850-RAP-01-130323.v2f. dated 22 June 2023.

2 IAA OUTCOME

Endorsement of this Remediation Action Plan (Rev. v2f) is provided following the Auditor's review and comments on the previous drafts. The Auditor considers that all comments have been addressed and provides endorsement of the remediation approach.

3 AUDIT CLOSE-OUT ACTIONS

The Auditor has noted during the site inspection of the 22 June 2023 that the majority of the contaminated soil is located in close proximity to the encapsulation areas utilising temporary stockpile areas as indicated in Figure 10 of the RAP.

The Auditor understands the following:

- The RAP (Version v2f) has been specifically developed to address the remediation and validation of known AECs and contaminants of concerns (CoC) in areas AEC09 to AEC21
- The environmental consultant, Sydney Environmental (SE), will revise the Stage 2 Detailed Site Investigation (DSI) report (Version v1f) and provide a copy to the Auditor for review

¹ This communication has been provided as interim advice only. Where applicable, the information provided is consistent with NSW EPA guidelines and policies. The advice does not constitute a site audit report or site audit statement and does not pre-empt the conclusions which will be drawn at the end of the audit process. A site audit report and site audit statement will be issued when the audit process has been completed.

- Areas of environmental concern (AECs), AEC01 to AEC08, that were identified in the Stage 2 DSI report (Version v1f) will be further characterised, with respect to soil contamination, in a Supplementary DSI report, and if required, addressed in a future addendum RAP
- A Validation Report will be prepared following remediation works in accordance with NSW EPA Reporting guidelines, which will also support the development of an LTEMP for the site. The details of the encapsulation areas, including as constructed design drawings will be prepared based on survey data collected during placement.

The Supplementary DSI report, addendum RAP, and/or Validation report will address any outstanding issues listed on the attached comments and will include details on the validation of the original soil source areas and any temporary stockpile areas.

On Auditor review and finalisation of the LTEMP and Validation Report it is intended that a Site Audit Statement Section A will be prepared by the Auditor.

Regards



Brad May
Contaminated Site Auditor | Principal Environmental
Engineer

0400497512
bmay@epicenvironmental.com.au

Enclosures: M12 West RAP Comments Register

Contaminated Site Audit Log IAA002 - RAP

Audit Details

Project Reference: SCL220026.01
Site Audit Notification: 2023/SY031
Site Address: Elizabeth Drive, Badgerys Creek NSW
Lot on Plan: Lot 2 DP1274964, Lot 16 DP1271571, Portion of Lot 1 DP235124, Lots 6, 7, 9, 11 & 12DP1270586, Portion of Lots 104, 107 DP1271336
Document name: Draft "Remedial Action Plan (RAP)" report. Revision v1f.
Document details: Report. No. 1850-RAP-01-100323.v1f. Dated 2 June 2023.



Table 1. Interim Audit Advice IAA002 on the Draft Remedial Action Plan (RAP) (Rev v1d prepared by SE)

Comment No.	Reviewer	Doc Rev	Review date	Reference/ Report Section	Review #1 of Rev v1d Auditor Comments to be Addressed [09/05/23]	Review #1 SQP Response [02/06/23]	Review #2 of Rev v1f [20/06/23] Further Auditor Comments to be Addressed	Review #2 SQP Response [22/06/2023]	Review #3 of Rev v2f [23/06/23]	Date Action Closed	Status (Open / Closed)
1	BM (Epic)	v1d	5/05/2023	General Comment	Epic Environmental (Epic) were commissioned by CPB Georgiou Group JV (the Client) to undertake the role of NSW Site Auditor (Auditor) for the M12 (West) Motorway Alignment at Badgerys Creek in NSW. The scope of works for this review will be limited to the investigation areas within the proposed M12 (West) Alignment, located at 777-782 Luddenham Road and 1953-2109 Elizabeth Drive.	Amended.	-	-	-	-	-
2	BM (Epic)	v1d	5/05/2023	General Comment	It should be noted that the contaminated land auditor (CLA) services for this site were undertaken in general accordance with the provisions of the <i>Contaminated Land Management Act 1997</i> (CLM Act), including (but not limited to) the NSW EPA (2017) Guidelines for the NSW Site Auditor Scheme (3rd Edition).	Amended.	-	-	-	-	-
3	BM (Epic)	v1d	5/05/2023	General Comment	This communication has been provided as interim advice only. Where applicable, the information provided is consistent with NSW EPA guidelines and policies. The advice does not constitute a site audit report (SAR) or site audit statement (SAS), and does not pre-empt the conclusions which will be drawn at the end of the audit process.	Amended.	-	-	-	-	-
4	BM (Epic)	v1d	5/05/2023	General Comment	Use of "site" is throughout the report. However, in some instances the use of 'the site' appears to refer to the 'proposed M12 (West) Motorway alignment' and in other instances, the 'investigation site(s) or investigation area(s)'. To avoid potential confusion, please clarify, and ensure consistent use of terminology. It is suggested that the use of 'site' be avoided in this report, and to use 'motorway alignment' and 'investigation area(s)'. Please update throughout the report.	Amended.	Please do a find/replace. The use of "site" or "the site" is still present within the RAP v1f and can lead to confusion as to whether the information being presented is in relation to the "alignment" or the "investigation areas (IAs)". For example the use of "site" was noted as follows: - Throughout the Executive Summary (e.g. page ii, Paragraph 1, Bullets 1, 2, and 7; Paragraph 2, Bullet 1, etc - Table 3.1: Acid Sulfate Soils row - Section 4.1 pg.9: 3 instances - Section 4.2, paragraph 2 - Etc.	Amended.	-	-	Closed
5	BM (Epic)	v1d	5/05/2023	General Comment	It is noted that in many instances the information in the RAP is generic in nature and not specifically focused on the M12 project or infrastructure construction. The RAP should be reviewed and updated to specifically focus on the M12 project, and specific controls and actions that are relevant to the construction of the infrastructure. Please update throughout the report	Amended.	-	-	-	-	Closed
6	BM (Epic)	v1d	5/05/2023	General Comment	The current RAP refers to the 'site' and areas of concern, AEC01 to AEC21. The RAP should only present information related to the areas/locations of the M12 alignment where proposed remediation works will be undertaken. The RAP should not include, or discuss, any areas/locations that are not (yet) subject to remediation. Please update throughout the report.	SE disagree. Given that AECs identified that are subject to further assessment may become remedial extents. SE have proposed remedial strategies for these areas. The site validation report will detail the outcome of these areas.	Noted that the AECs that require further assessment present a degree of uncertainty to the current remediation scope that cannot be managed under this RAP. AECs may include contaminants that may not be accommodated under the current approach. It is strongly suggested that any if other AECs require remediation following further assessment, then a NEW RAP would be developed to address these new areas.	Understood. AEC01-AEC08 have been removed from this RAP and will be addressed in an addendum RAP (if required, following characterisation).	-	-	Closed
7	BM (Epic)	v1d	5/05/2023	Executive Summary	Update the executive summary with respect to all the audit comments.	Amended.	Update the executive summary with respect to all the audit comments. This does not appear to be completed.	Updated	-	-	Closed

8	BM (Epic)	v1d	5/05/2023	Executive Summary	The Exec summary should clearly outline the requirements of the Conditions of Approval for M12 Motorway SS1-9364, and the clauses relevant to the DSI, RAP and the Audit. The RAP should confirm how it meets the SSI conditions.	Amended.	The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary. The amended infomration is not correct as the text suggests that a Section B SAS will be issued on the endorsment of the RAP . The condition actually stats : <u>the Remediation Action Plan and an Interim Audit Advice or a Section B Site Audit Statement from a NSW EPA accredited Site Auditor that certifies that the Remediation Action Plan is appropriate and that the site can be made suitable for the proposed use.</u> Please amend as the intentaion is to issue an IAA on the RAP for this portion of works.	Updated	-	-	Closed
9	BM (Epic)	v1d	5/05/2023	Executive Summary	The objectives of the RAP should also state that objective is to facilitate construction of the motorway. It is recommended that where the RAP has referred to 'redevelopment', a more accurate term would be 'construction' to avoid any potential confusion.	Amended.	The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary.	Updated	-	-	Closed
10	BM (Epic)	v1d	5/05/2023	Executive Summary	[Pg.ii] Third Dot point section refers to Urban Residential Land use. This appears to be inconsistent with the remainder of the RAP and likely to be carry over from another project. Please amend.	Amended.	The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary.	Updated	-	-	Closed
11	BM (Epic)	v1d	5/05/2023	Executive Summary	Reconsider having Table 5.1.1 presented within this section. Note, the RAP should only be referring the areas/locations and works that are actually defined in the scope and not include areas that are not (yet) subject to remediation.	Agreed. Amended.	The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary.	Updated	-	-	Closed
12	BM (Epic)	v1d	5/05/2023	Executive Summary	[Pg.iv] (1) Please clarify what is meant by "where identified" in the first sentence. (2) Please review the statement "within the site <u>nothing</u> that this remedial approach will result in the need for "....."	Amended.	The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary.	Updated	-	-	Closed
13	BM (Epic)	v1d	5/05/2023	Executive Summary	Reconsider the inclusion of Table 8.2.1 in the exec summary. Remove all references to AECs that have not been subject to adequate characterisation and do not form part of the remedial actions. It is suggested that subsequent DSI and RAPs will be required to address these areas.	Amended.	The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary.	Updated	-	-	Closed
14	BM (Epic)	v1d	5/05/2023	Executive Summary	[Table 8.2.1] The information relating to AEC16, AEC17, AEC19, and AEC20 do not indicate what is the contaminant of potential concern (COPC) that is the focus of remediation.	Amended.	The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary.	Updated	-	-	Closed
15	BM (Epic)	v1d	5/05/2023	Executive Summary	[Pg.vii] The Auditor is not able to agree that remedial goals can be achieved where a large number of AECs have not been assessed and will be subject to further investigation programs. It is recommended that only known areas requiring remediation are described in this RAP, and that only specific tasks are included for the Auditor to endorse the RAP. As subsequent DSIs and/or RAPs may be required for the AECs that have not been assessed.	SE argue that given the nature of contamination (small and localised) identified so far, that minor unknown contamination risks are likely to be consistent with those identified thus far and that it is reasonable to provide	The degree of uncertainty presented due to areas not being accessed or the full extent of contamination not being delineated that will likly have a material impact on excepted voluems and will require further assessment and remediation planning. At present the capacity of the encapsulations requiremnts and capacity is not clearly articulated and it is therefore not possible to endorse the RAP with the level of uncertainty accepted by the consultant. The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary.	Known contamination (AEC09-AEC21) quantities are outlined in more detail within the RAP (Table8.2.1). Proposed containment cell volumes are also outlined within the RAP (new Table 8.3.1).	Closed on the understanding that areas of environmental concern AEC01 to AEC08, identified in the Stage 2 DSI will be further characterised in a Supplementary DSI report, and as required, addressed in a future addendum RAP.	23/06/2023	Closed - subject to further reqmts*

16	BM (Epic)	v1d	5/05/2023	Executive Summary	The requirements of the SS1-9364 approval should be discussed and the role of the Auditor. The areas that are subject of the Audit need to be clearly defined in accordance with the SSI conditions. The specific Audit areas will require a plan prepared by a registered surveyor in accordance with NSW EPA requirements. Please clarify if the outcome will be a SAS 1A or 1B?	The outcome of this specific audit (relevant to the RAP) will be a B2 SAS - To determine the appropriateness of a remediation plan. Following remedial works, SE expect the final SAS to be A2 (Land is suitable subject to an environmental management plan)	The Executive Summary will be reviewed in detail by the Auditor in the next revision. As many comments pertaining to the RAP document remain 'open' and these will directly influence the content in the Executive Summary. The amended information is not correct as the text suggests that a Section B SAS will be issued on the endorsement of the RAP. The condition actually states: the Remediation Action Plan and an Interim Audit Advice or a Section B Site Audit Statement from a NSW EPA accredited Site Auditor that certifies that the Remediation Action Plan is appropriate and that the site can be made suitable for the proposed use. Please amend as the intention is to issue an IAA on the RAP for this portion of works.	Updated	Closed on the understanding that: - The Site Audit will need to address all areas of environmental concern (AECs) identified as AEC01 to AEC21 in the Stage 2 DSI. - Areas of environmental concern AEC01 to AEC08, identified in the Stage 2 DSI will be further characterised in a Supplementary DSI report, and as required, addressed in a future addendum RAP - The Auditor will be supplied the future documents (i.e. the Supplementary DSI report and addendum RAP) for review	23/06/2023	Closed - subject to further reqmts*
17	BM (Epic)	v1d	5/05/2023	Table of Contents (TOC) - report sections	Check all Heading Level 3s are displaying. It is noted that headings for Sections 9.5.1 to 9.5.5 are not presented in the TOC.	Amended.	-	-	-	20/06/2023	Closed
18	BM (Epic)	v1d	5/05/2023	General Comment - Information common with the Draft Stage 2 DSI report	It is noted that the following sections and sub-sections of the RAP have the same information, data, tables, and/or figures, which were previously presented in the (SE 2023) <i>Draft "Stage 2 - Detailed Site Investigation (DSI) (revision v1d) report</i> : Sections 1.1, 1.2, 2.0, 3.0, 4.0, 4.1, 4.2, 4.4 to 4.9, and 5.1 to 5.10, and the Figures section. Please update these RAP sections with respect to the auditor comments summarised in IAA001-DSI_v1d.	Amended.	It is noted that the following sections and sub-sections of this RAP v1f have very similar information (i.e text, sentences), data, tables, and/or figures, which are also presented in the (SE 2023) <i>Draft "Stage 2 - Detailed Site Investigation (DSI) (revision v1f) report</i> : - Sections 1.1, 1.2, 2.0, 3.0, 4.0, 4.1 to 4.8, and 5.1 to 5.10; and - Figures section. Please update these RAP sections with respect to the auditor comments summarised in IAA001-DSI_v1f.	Updated as per auditor comments outlined within Round 2 DSI comments 21 June 2023.	-	23/06/2023	Closed
19	BM (Epic)	v1d	5/05/2023	General Comment - Information common with the Draft Stage 2 DSI report	The RAP should be developed to specially focus on the known areas of environmental concern (AECs) that require remediation or management. Please remove references to AECs yet to be assessed, presently unknown, and/or of a general generic nature.	SE believe it appropriate to include remedial strategies to address small unexpected finds. Revised presentation.	Noted. Refer subsequent comments regarding uncertainty in volumes and encapsulation capacity.	-	-	20/06/2023	Closed
20	BM (Epic)	v1d	5/05/2023	TOC - List of Tables	A list of the tables (that are presented within the body of the report) is not provided.	Amended.	-	-	-	20/06/2023	Closed
21	BM (Epic)	v1d	5/05/2023	1.2 Proposed Development	A more comprehensive discussion of the project construction would be required to confirm that 'HIL-A Commercial/ Industrial land use' is appropriate. Please detail the final land use across the entire project, and specifically in the areas of remediation and encapsulation.	The final land use will be Commercial / Industrial across the alignment. Should portions of the alignment be sold back, then further assessment may be required due to a proposed change in land-use. Containment cells will be located within the roadway of the Motorway.	Include comments in the report text to address: - Should portions of the alignment be sold back, then further assessment may be required due to a proposed change in land-use - Capped containment cells holding impacted fill (generated from onsite remediation activities) will be located beneath the roadway of the Motorway	Noted and amended within Section 1.2.	-	23/06/2023	Closed
22	BM (Epic)	v1d	5/05/2023	1.2 Proposed Development	(1) It is noted that Blacktown City Council is referred to in Section 1.2; however, Penrith Council is stated in Table 2.1. Please amend. (2) Please include: a detailed review of the SS1-9364 conditions; requirements relating to contaminated land; and explanation of how the DSI and RAP satisfy the SS1-9364 requirements.	Amended.	(1) Item closed (2) Please include: - a detailed review of the SS1-9364 conditions - requirements relating to contaminated land - explanation of how the DSI and RAP satisfy the SS1-9364 requirements	(2) Detailed within section 1.2.	The SQP responses (dated 22/06/23) indicate that a future supplementary DSI will be prepared. New information on page 2, paragraph 1, states " <i>The DSI previously undertaken by SE (2023) meets the conditions listed within Conditions E85 and E86 detailed above.</i> " The Auditor notes it would be more accurate to state that the both the ' <i>DSI and the future Supplementary DSI (to address AEC01 to AEC08)</i> ' would meet the requirements of E85 & E86.	23/06/2023	Closed
23	BM (Epic)	v1d	5/05/2023	1.3 Objectives	(1) Objectives are currently stated for the 'project'. Please clarify if the project is referring to the M12 (West) Motorway alignment, and not the investigation areas. (2) [Bullet 1] Clarify if this bullet point is referring to preparing a RAP to address the issues that have been identified within the M12 (West) Motorway Alignment, or alternatively the two investigation areas (assessed as part of the Stage 2 DSI intrusive fieldwork) located at 777-782 Luddenham Road and 1953-2109 Elizabeth Drive? (3) Where relevant, state work which was not undertaken as part of the RAP	Amended.	-	-	-	20/06/2023	Closed
24	BM (Epic)	v1d	5/05/2023	1.3 Objectives	Include reference to: the Critical State Significant Infrastructure (CSSI); the role of the Audit; and outcomes for the SAS.	Amended.	Include reference to: the role of the Audit; and outcomes for the SAS.	Detailed further within 1.3.	-	23/06/2023	Closed

25	BM (Epic)	v1d	5/05/2023	1.4 Scope of Work	[1st sentence] For clarity, reference the dates of the previous JBS&G, Coffey, and SE report, which are supplied in Section 14.0 References. This will provide clarity on which reports have been relied upon for this RAP, and those which have not been relied upon.	Amended.	-	-	-	20/06/2023	Closed																																																																									
26	BM (Epic)	v1d	5/05/2023	1.4 Scope of Work	[Bullet 1] States "... appropriate remedial strategy to render the site suitable for the proposed urban residential land use ". To resolve potential confusion, provide further discussion/context. As Section 1.2 states "... redevelopment scenario is consistent with the definition of 'HIL D – Commercial/Industrial' per ASC NEPM 2013 ".	Amended.	-	-	-	20/06/2023	Closed																																																																									
27	BM (Epic)	v1d	5/05/2023	4. PREVIOUS CONTAMINATION ASSESSMENTS	Bullet 3 appears to present the same information as Bullet 1. Please confirm if this is double up, and it affects the referencing of JBS&G reports throughout the report and the labelling of subsection headings.	Bullet 3 (JBS&G) was a double up of Bullet 1 (JBS&G). This has been amended in Section 4 and throughout the report.	-	-	-	20/06/2023	Closed																																																																									
28	BM (Epic)	v1d	5/05/2023	4.3. JBS&G (2020c)	Subsections 'Introduction and Objectives', 'Scope of Works', and Bullets 1 to 6 of 'Findings' appear to be the same information as Section 4.1 JBS&G (2020a). Please clarify and amend as required.	JBS&G (2020c) was a double up of JBS&G (2020a) as identified in the previous comment. This section (4.3) was removed and all other sections updated accordingly.	-	-	-	20/06/2023	Closed																																																																									
29	BM (Epic)	v1d	5/05/2023	4.3. JBS&G (2020c)	Bullets 7 to 10 appear to BE new information, which was not previously presented in the (SE 2023) Stage 2 DSI report. Please clarify and amend as required in the RAP and/or Stage 2 DSI report.	JBS&G (2020c) was a double up of JBS&G (2020a) as identified in the previous comment. This section (4.3) was removed and all other sections updated accordingly.	-	-	-	20/06/2023	Closed																																																																									
30	BM (Epic)	v1d	5/05/2023	4.3. JBS&G (2020c)	Subsection 'Conclusions and Recommendations' appears to be the same information as Section 4.2 JBS&G (2020b). Please clarify and amend as required.	JBS&G (2020c) was a double up of JBS&G (2020a) as identified in the previous comment. This section (4.3) was removed and all other sections updated accordingly.	-	-	-	20/06/2023	Closed																																																																									
31	BM (Epic)	v1d	5/05/2023	4.10. SE (2023)	It is noted the bulk of information presented in this section are extracts of Sections 1.1, 1.3, 1.4, and 14.0 of the (SE 2023) Stage 2 DSI. Please ensure that the Stage 2 DSI comments provided in IAA001-DSI_v1d are also addressed in this section.	Amended as appropriate from DSI comments.	[changed to Section 4.9] (1) It is noted the bulk of information presented in this section are extracts of Sections 1.1, 1.3, 1.4, 13.0 and 15.0 of the (SE 2023) Stage 2 DSI. Please ensure that the Stage 2 DSI comments provided in IAA001-DSI_v1f are also addressed in this section. (2) [Bullets 1 & 2] Refers to "the site". Should this refer to "the alignment"? (3) [Bullet 3 to 5] References do not match to the the documents listed in Section 14 Reference. Please revise. (4) [Pg.17, last paragraph] Information provided in Section 8.1 of the Stage 2 DSI v1f suggests that there were 217 soil sampling locations - not 209 as stated in Section 4.10	(1) Comments from Round 2 DSI comments were addressed and updated throughout. (2) Amended. (3) Amended to reflect referencing in Section 14 (4) Noted and amended.	-	23/06/2023	Closed																																																																									
32	BM (Epic)	v1d	5/05/2023	4.10. SE (2023)	[Par.5] States "... (209) sampling locations were advanced across the accessible areas of the alignment footprint. Two-hundred and fourteen (214) samples were collected and submitted ". However, Section 8.1 of the Stage2 DSI states "Analysis of two-hundred and thirty-six (236) primary soil samples ". Please clarify this inconsistency, and amend as required in the RAP and/or Stage 2 DSI.	The correct sampling density is 209 test pits and 236 samples as stated in the Stage 2 DSI. This has been amended throughout the RAP.	[changed to Section 4.9] Data provided in Section 8.1 of the Stage 2 DSI v1f suggests that there were 217 soil sampling locations - not 209 as stated in Section 4.10. See below table.	Noted and amended within Section 4.9.	-	23/06/2023	Closed																																																																									
							<table border="1"> <thead> <tr> <th rowspan="2">Investigation area (location / address)</th> <th rowspan="2">Investigation date</th> <th rowspan="2">Consultant (report date)</th> <th rowspan="2">Location IDs</th> <th colspan="2">Soil sampling program</th> <th colspan="2">Potential ACM sampling program</th> </tr> <tr> <th>No. of sampling locations</th> <th>Total no. of primary samples collected /analysed</th> <th>Total no. of QA/QC samples collected /analysed</th> <th>Location IDs</th> <th>Total no. of primary samples collected /analysed</th> <th>Total no. of QA/QC samples collected /analysed</th> </tr> </thead> <tbody> <tr> <td rowspan="2">777-819 Ludenhams Rd</td> <td>12/11/2020</td> <td>JBS&G (2020f)</td> <td>?</td> <td>3</td> <td>?</td> <td>?</td> <td>?</td> </tr> <tr> <td>28/09/2022</td> <td>SE (2023)</td> <td>Test Pits (TPs) at SP01 to SP09</td> <td>27</td> <td>27</td> <td>?</td> <td>SP06-FC, SP09-FC</td> </tr> <tr> <td rowspan="3">1953-2103 Elizabeth Dr</td> <td>13/10/2022</td> <td>SE (2023)</td> <td>TPs at TP01 to TP08</td> <td>8</td> <td>16</td> <td>?</td> <td>TP04-FC, TP05-FC</td> </tr> <tr> <td>11/11/2020</td> <td>JBS&G (2020g)</td> <td>?</td> <td>?</td> <td>?</td> <td>?</td> <td>?</td> </tr> <tr> <td>10/11/2022</td> <td>SE (2023)</td> <td>SP01-1 to SP30-3</td> <td>87</td> <td>?</td> <td>?</td> <td>SP12-FC, SP30-FC</td> </tr> <tr> <td rowspan="2"></td> <td></td> <td>SE (2023)</td> <td>TP01 to TP23</td> <td>23</td> <td>?</td> <td>?</td> <td>None collected?</td> </tr> <tr> <td>10/01/2023</td> <td>SE (2023)</td> <td>SP17-1 to SP17-10, and SP01-1 to SP04-3</td> <td>22</td> <td>22</td> <td>?</td> <td>None collected?</td> </tr> <tr> <td colspan="4">Sub-totals for SE (2023) Stage 2 DSI v1f</td> <td>217</td> <td>236</td> <td>24</td> <td>0?</td> </tr> </tbody> </table>		Investigation area (location / address)	Investigation date	Consultant (report date)	Location IDs	Soil sampling program		Potential ACM sampling program		No. of sampling locations	Total no. of primary samples collected /analysed	Total no. of QA/QC samples collected /analysed	Location IDs	Total no. of primary samples collected /analysed	Total no. of QA/QC samples collected /analysed	777-819 Ludenhams Rd	12/11/2020	JBS&G (2020f)	?	3	?	?	?	28/09/2022	SE (2023)	Test Pits (TPs) at SP01 to SP09	27	27	?	SP06-FC, SP09-FC	1953-2103 Elizabeth Dr	13/10/2022	SE (2023)	TPs at TP01 to TP08	8	16	?	TP04-FC, TP05-FC	11/11/2020	JBS&G (2020g)	?	?	?	?	?	10/11/2022	SE (2023)	SP01-1 to SP30-3	87	?	?	SP12-FC, SP30-FC			SE (2023)	TP01 to TP23	23	?	?	None collected?	10/01/2023	SE (2023)	SP17-1 to SP17-10, and SP01-1 to SP04-3	22	22	?	None collected?	Sub-totals for SE (2023) Stage 2 DSI v1f				217	236	24	0?		
Investigation area (location / address)	Investigation date	Consultant (report date)	Location IDs	Soil sampling program		Potential ACM sampling program																																																																														
				No. of sampling locations	Total no. of primary samples collected /analysed	Total no. of QA/QC samples collected /analysed	Location IDs	Total no. of primary samples collected /analysed	Total no. of QA/QC samples collected /analysed																																																																											
777-819 Ludenhams Rd	12/11/2020	JBS&G (2020f)	?	3	?	?	?																																																																													
	28/09/2022	SE (2023)	Test Pits (TPs) at SP01 to SP09	27	27	?	SP06-FC, SP09-FC																																																																													
1953-2103 Elizabeth Dr	13/10/2022	SE (2023)	TPs at TP01 to TP08	8	16	?	TP04-FC, TP05-FC																																																																													
	11/11/2020	JBS&G (2020g)	?	?	?	?	?																																																																													
	10/11/2022	SE (2023)	SP01-1 to SP30-3	87	?	?	SP12-FC, SP30-FC																																																																													
		SE (2023)	TP01 to TP23	23	?	?	None collected?																																																																													
	10/01/2023	SE (2023)	SP17-1 to SP17-10, and SP01-1 to SP04-3	22	22	?	None collected?																																																																													
Sub-totals for SE (2023) Stage 2 DSI v1f				217	236	24	0?																																																																													
33	BM (Epic)	v1d	5/05/2023	4.10. SE (2023)	[Par.5] Provide statistics (e.g. no. of locations, no. of samples collected and analysed, etc.) for asbestos .	Provided in Point 15 of the summary.	[changed to Section 4.9] [Pg.17, Par.5] Please clarify what is meant by the SE's response of "Point 15 of the Summary". Which summary - where is the report?	Disregard previous comment. 217 sampling locations, collection and analysis of 236 samples outlined in the summary for Section 4.9.	[changed to Section 4.9, Pg.27, Par.1] Closed on the understanding that ther statistics (e.g. no. of locations, no. of samples collected and analysed, etc.) for asbestos will be addressed in by the future remediation and validation documentation.	23/06/2023	Closed - subject to further reqmts*																																																																									

34	BM (Epic)	v1d	5/05/2023	General comment - 4.0 Previous Contamination Assessments	<i>[Topic - Evaluation of previous contamination assessments]</i> Create a section to detail the Consultant's/SE's evaluation of the all the previous JBS&G, Coffey, and SE contamination assessments conducted to date. Make comments on: - Why the Stage 2 DSI was only undertaken at two investigation sites located at 777-782 Luddenham Rd and 1953-2019 Elizabeth Drive - Why DSIs (both targeted investigations at identified onsite AECs and/or limited grid based investigations) as recommended by JBS&G (as detailed in Sections 4.2, 4.3, and 4.7 in the (SE 2023) Stage 2 DSI) were not undertaken as part of the Stage 2 DSI - Highlight AEC01 and AEC02 and AEC03 to AEC08 require further HBMS to be conducted prior to demolition and supplementary contamination assessments, respectively - Potential data gaps (i.e. areas of the alignment not assessed to date, etc.), any uncertainties, and unknowns	Not required at this stage of site works.	If not relevant at this stage, please clarify when the requested information be provided and where this information is proposed to be presented (e.g. which future report?). Referr comments relating to subsequent assesemtn and RAPs if needed.	The requested information will be provided within a future supplementary DSI.	Closed on the understanding that a future supplementary DSI will be undertaken and provided to the Auditor	23/06/2023	Closed - subject to further reqmts*
35	BM (Epic)	v1d	5/05/2023	General comment - 4.0 Previous Contamination Assessments	<i>[Topic - Contamination characterisation / analytical results]</i> Characterise the known contamination within the investigate areas by providing a summary of the results (including tables and figures) in the JBS&G, Coffey and SE (Stage 2 DSI) investigation reports, to highlight the results/concentrations of contaminants of potential concern (COPCs) that have exceeded the adopted site assessment criteria (SAC), in relation to the AECs and sampling location IDs. Use text boxes in figures to show: the COPC exceedances (i.e. sample ID number, sampling depth, and colour code the exceeding concentration); presence/sighting of potential ACM fragments or friable asbestos (at HA01); and depths to base of fill.	Not required at this stage of site works.	If not relevant at this stage, please clarify when the requested information be provided and where this information is proposed to be presented to meet the NSW EPA reporting requirements. (e.g. which future report?).	The requested information will be provided within a future supplementary DSI.	Closed on the understanding that a future supplementary DSI will be undertaken and provided to the Auditor	23/06/2023	Closed - subject to further reqmts*
36	BM (Epic)	v1d	5/05/2023	5.1. Areas of Environmental Concern and Contaminants of Concern	(1) Clarify if the following sentence should be amended as follows " <i>The AECs identified are presented in attached Figure s 2 to 9 and associated contaminants of concern</i> " (2) The bulk of the information presented in Section 5.1 and Table 5.11 is sourced from Section 13.0 of the (SE 2023) Stage 2 DSI. Please update to address the Stage 2 DSI auditor comments provided in IAA001-DSI_v1d. (3) Ensure Table 5.1.1 includes new columns for: location/address; lot ID; and sampling location IDs (e.g. test pits, stockpiles, former JBS&G &/or Coffey investigation locations, etc).	Amended.	<i>[Retitled to Section 5.1 Known and Potential Areas of Environmental Concern and Contaminants of Concern]</i> (1) Provide a sentence to reference (revised numbering of) Figures 3 to 13 in the Figures Section (2) The information presented in Tables 5.1.1 & 5.1.2 appear to be directly sourced from Table 13.6.1 Revised AEC and COPC in the (SE 2023) Stage 2 DSI. Please update to address the Stage 2 DSI auditor comments provided in IAA001-DSI_v1f. (3) Item closed (4) [Par.1] Provide a context sentence of how 'Table 5.1.1 Areas of Environmental Concern and Contaminants of Concern Requiring Further Assessment' relates to the RAP, and how the RAP will use, or not use, this information in the RAP. Is this information presented: (i) to demonstrate that other areas still require further assessment?; (ii) indicate taht these areas will be investigated by future supplementary investigations and details/findings will be presented under a separate DSI report(s)?; (iii) future RAPs will be developed/tailored for these areas? (5) Provide a context sentence to reference Table 5.1.2 Areas of Environmental Concern and Contaminants of Concern Requiring Remediation to explain how this RAP will focus on developing a strategy to remediate the AECs of AEC09 to AEC21.	1) Final sentence amended. (2) Table 13.6.1 notes will be discussed further in the DSI amendment. Referencing to former PAECs within the DSI CSM will be discussed within the DSI and numbering in this RAP reflects the final numbering that will be adopted in the final DSI amendment. AECs that weren't addressed within the revised CSM of the DSI wil also be discussed within the DSI and where required, will be addressed in a RAP addendum. (4) Mention of AEC01-08 have been removed from the RAP to avoid confusion. AEC01-08 still require further assessment which is to be documented in greater detail in the DSI. (5) Sentence added in paragraph 1.	Closed on the understanding that: - Items (2) and (4) will be further addressed in the Stage 2 DSI report - Areas of environmental concern AEC01 to AEC08, as identified in the Stage 2 DSI, will be further characterised in a Supplementary DSI report, and as required, addressed in a future addendum RAP	23/06/2023	Closed - subject to further reqmts*
37	BM (Epic)	v1d	5/05/2023	5.1. Areas of Environmental Concern and Contaminants of Concern	Please remove all references to AECs that are not subject to specific actions under this RAP. The RAP should only address the lots/sites that have areas of know contamination that can be defined and managed under this RAP. Note, subsequent RAPs may be required.	Amended.	Unclear where amendment has been made. As, AEC01 to AEC08, which require further assessment are still presented in Section 5.1, in Table 5.1.1.	AEC01-08 removed from Section 5.1, now amended.	-	23/06/2023	Closed
38	BM (Epic)	v1d	5/05/2023	5.1. Areas of Environmental Concern and Contaminants of Concern	[page 18] (1) Please clarify potential receptors for the site as being " <i>Future Residents / End Users</i> " (2) Please confirm that the M12 project will not include open space or publicly accessible areas.	(1) Amended. (2) There will be a shared pathway (pedestrians/cyclists) that is publically accessible. Noted in changes made in Section 5.2.	(1) Information presented appears similar to previous v1d report. Unclear where amendment has been made. Please clarify. (2) Item closed	Amended to future end users which will include future users of the M12 motorway	-	23/06/2023	Closed
39	BM (Epic)	v1d	5/05/2023	5.2. Land Use Setting	States " <i>adopt the "HIL D – commercial/industrial" land use setting for the purpose of assessing land contamination exposure risks"</i> . Section 1.4 states "... appropriate remedial strategy to render the site suitable for the proposed urban residential land use". Resolve this inconsistency.	Amended	-	-	-	20/06/2023	Closed
40	BM (Epic)	v1d	5/05/2023	5.2. Land Use Setting	As above, please confirm that the M12 will not also include open space or public access areas such as bikeways or pathways.	Amended.	-	-	-	20/06/2023	Closed

41	BM (Epic)	v1d	5/05/2023	5.3 Direct Contact	The second paragraph indicates that the entire M12 project will be subject to capping in either roadway or landscaping. Please confirm that this is the case.	Amended.	(1) [Par.1] Now states "SE further notes that <i>importation of filling materials may complete a direct contact exposure pathway for future site uses.</i> " Please clarify what is meant by this sentence. Please clarify how the public will be exposed to direct contact pathways during construction.	"SE understand that the alignment is proposed for development of the M12 Motorway and associated infrastructure. SE further notes that impacted soil materials may complete a direct contact exposure pathway for future alignment uses. As such, further consideration of this value is necessary". Reference to imported fill materials is not clear to SE as the above statement is what is outlined within the RAP. Dust generation has been discussed in Section 5.3	Noted. Text amended.	23/06/2023	Closed
42	BM (Epic)	v1d	5/05/2023	5.4 Inhalation/Vapour	[Par.1&2] The reference to and discussion relating to Vapour intrusion is unclear, and does not appear to be consistent with the Stage 2 DSI for the investigated sites. Please review and amend.	Amended to be consistent with the Stage 2 DSI.	Information presented in RAP v1f appears similar to previous RAP v1d report. Unclear where amendment has been made in RAP v1f. Please clarify if the amendment was made in the Stg2DSI v1f report so both the DSI and RAP are now consistent.	Reference to the adjacent landfill has been removed and will be addressed in future contamination assessments (where required) as the investigation areas discussed in this report are not present within the 'eastern portion of the alignment'.	-	23/06/2023	Closed
43	BM (Epic)	v1d	5/05/2023	6.1. Site Assessment Criteria	(1) Also discuss what criteria (and associated reference/guideline) that will be adopted for evaluation of: waste classification; offsite disposal acceptance; imported fill; backfilling material; etc. (2) As part of the discussion, provide: (i) Rationale for the selection of criteria, including assumptions and limitations of the criteria and any deviations from the approved guidelines (ii) Rationale for any site-specific remediation criteria developed through a site-specific risk assessment, and refer to the relevant ASC NEPM Schedules	1 - Assessment Criteria for Waste Classification is not part of this report. Criteria for imported fill is discussed in Validation Methodology table 9.7.1. 2 - The rationale for the selection of criteria encompasses the objectives for the project, the conceptual site model developed, the land use setting and relevant legislation referenced. This is laid out in 6.1 Site Assessment Criteria.	Noted.	-	-	20/06/2023	Closed
44	BM (Epic)	v1d	5/05/2023	6.1. Site Assessment Criteria	[Table 6.1.1] (1) Suggest inclusion of a new column to summarise the contaminants of potential concern (COPC)/analytes, which corresponds to the adopted criteria (i.e. column 3) and reference/guideline (Column 4) (2) [Row 1, Column 4] Check accuracy of the reference of "Table B4 in Friebel, E & Nadebaum P (2011)" (3) [Row 1, Column 4] Clarify why references to E.Coli and faecal coliforms, and biosolid product have been adopted as remediation criteria (4) [Row 2] Specify the soil type (e.g. sand, silt, clay) that is proposed to be adopted as the site assessment criteria (SAC) (5) [Row 4] Specify if the adopted SAC are generic EILs, site-specific EILs, and/or ESLs (6) [Row 4] Specify the soil type that is proposed to be adopted as the SAC	(1) - COPC information is provided in table 7.3.1 (2) - Reference to Table B4 "Soil Health Screening Levels for Direct Contact" is accurate. (3) - In the event of further contamination encountered. (4) - SAC encompasses the primary soil types encountered on site (Silty Clay, Sandy Clay and Clay) (5) - a site specific EIL criteria was adopted. (6) - same as (4).	Noted.	-	-	20/06/2023	Closed
45	BM (Epic)	v1d	5/05/2023	7. REMEDIATION STRATEGY OPTIONS DISCUSSION	States "A range of soil remediation options have been considered for the site". Clarify (in the text) if the remediation options have been considered for the motorway alignment, or for the two investigation areas located at 777-782 Luddenham Road and 1953-2109 Elizabeth Drive.	Amended "Site" to "alignment" - as stated in the address introduction.	-	-	-	20/06/2023	Closed
46	BM (Epic)	v1d	5/05/2023	7.1. Remediation Strategy Development Rationale	Draw in the key conclusions from the Stage 2 DSI report and specify/state the COPCs requiring remediation, and the associated depths.	COPCs and remedial extent is outlined in Table 8.2.1 "Approximate Remediation Extent". Depths of contamination are TBC but presumed at 1 m bgl, subject to change by site observations. Key conclusions from the Stage 2 DSI are summarised by Section 5. Conceptual Site Model and Table 8.2.1. Approximate Remediation Extent.	Noted.	-	-	20/06/2023	Closed
47	BM (Epic)	v1d	5/05/2023	7.1. Remediation Strategy Development Rationale	It is noted that in earlier sections of the RAP that heavy metal, BaP, and benzene were identified as contaminant of concern. Please clarify how these contaminants may be visually identified and delineated.	Amended to include the possibility of visually identifying and delineating clear fill materials in some cases. That is why various remediation options are to be considered.	Noted.	-	-	20/06/2023	Closed

48	BM (Epic)	v1d	5/05/2023	7.2. Remediation Options for Impacted Soils	Clearly articulate and provide a rationale for the selection of the recommended remedial options, in accordance with the preferred hierarchy of site remediation and/or management set out in the Key Principles for Remediation and Management of Contaminated Sites of the ASC NEPM Toolbox. Please clarify that the containment is ex-situ. Please discuss and confirm that the approach is consistent with the NSW EPA position paper https://www.epa.nsw.gov.au/your-environment/contaminated-land/other-contamination-issues/managing-asbestos-in-and-on-land/position-statement-wa-managment-of-asbestos-sites	Refer to Table 7.3.2. Confirmed.	Noted.	-	-	20/06/2023	Closed
49	BM (Epic)	v1d	5/05/2023	7.2. Remediation Options for Impacted Soils	[Table 7.3.2, Cap and Contain] (1) Make comments with respect to the: - Need for a: Section 10.7 Planning Certificate and covenant registered on the title to the land; or development and implementation of a long-term EMP - Potential issues such as leachability - Potential need for: ongoing monitoring (via a long-term Environmental Management Plan (EMP)); ongoing requirements for reporting (to government departments) and record keeping; ongoing scheduled or adhoc maintenance; ongoing liability risk to site owner; etc. (2) Clarify if validation samples will be required at remediated locations to demonstrate the remaining insitu soils are suitable for the proposed landuse	Amended. Yes they will be required.	[changed to Table 7.3.3 Remedial Options Summary] Noted that table has been significantly revised/updated to include additional information. (1) Make comments with respect to the need for a: Section 10.7 Planning Certificate and covenant registered on the title to the land; or development and implementation of a long-term EMP. (2) Item closed	Amended.	-	23/06/2023	Closed
50	BM (Epic)	v1d	5/05/2023	7.2. Remediation Options for Impacted Soils	[Table 7.3.2, Excavation and Offsite Disposal] (1) States " <i>Decommissioning and removal of UST/septic system and potentially contaminated soil to an EPA licensed facility</i> ". Please clarify. As previous JBS&G (2020a to 2020g), Coffey (2020) and SE Stage 2 DSI (2023) investigations have not discussed the presence of UST(s) or septic system(s) (2) Make comments on the how this strategy will eliminate ongoing liability risk to the site owner, as risk is now with the EPA licensed facility	(1) - In the event a UST/Septic is identified in future works (2) - Comment Made in Column 2 Row 3.	Noted that if USTs or Septic are encountered the controls and approach for remediation would not be appropriate and may require further assessment, including groundwater, RAPs and validation strategies, please amend.	Mention of USTs and Septic systems removed to avoid confusion. If UST's or septic systems are to be uncovered during bulk earthworks, further assessment and a RAP addendum will be provided (if required).	Closed on the understanding that if UST's or septic systems are uncovered during bulk earthworks, further assessment and a RAP addendum will be provided (if required) by SE.	23/06/2023	Closed - subject to further reqmts*
51	BM (Epic)	v1d	5/05/2023	7.3. Preferred Remediation Option	Discuss how the adopted/selected remediation options will meet the remediation objectives.	Portions added within 7.3 discussion and Table 7.3.3	-	-	-	20/06/2023	Closed
52	BM (Epic)	v1d	5/05/2023	7.3. Preferred Remediation Option	SE to confirm and discuss that: (1) SE have considered the other preferred approaches from the remediation hierarchy, set out in s.6(16) Assessment of Site Contamination Policy Framework of Schedules A and B of the NEPM, and evaluated that onsite containment and capping is the best option for contaminated soils arising from AEC09 to AEC21 (2) SE consider onsite containment/burial of asbestos contaminated soil as appropriate because: the asbestos contaminated soil has not been imported to the investigation areas; it does not trigger s142A of the POEO Act in relation to pollution of land; and it does not trigger s144AAB of the POEO Act (3) Excavation and offsite disposal at a licenced facility may be the preferred option for contamination risk described in Table 7.3.1 as: " <i>Soil: Ecological risks (Heavy Metals, BTEX, TRH, PAH) (if identified)</i> " and " <i>Soil: Asbestos (if identified)</i> ". This option may also be preferred for " <i>Soil: Ecological risks (Heavy Metals, BTEX, TRH, PAH) (if identified)</i> " and " <i>Soil: Asbestos (if identified)</i> "	(1) SE note the hierarchy set out in s.6(16) Assessment of Site Contamination Policy Framework of Schedules A and B, identifying the most practical outcome to be the consolidation and isolation of the the soil on site by containment. (2) The on-site containment of asbestos impacted waste is appropriate as the waste was identified to have originated on-site and therefore does not trigger s142A or s144AAB of the POEO Act. (3) Table 7.3.3. Remedial Options Summary has been expanded to encapsulate more treatment options available. It is the opinion of SE that the Cap and Contain strategy remains the preferable outcome.	Noted. Item closed. However, for clarity and transparency, it is suggested that the additional rationale provided by SE (dated 02/06/23) be included into Section 7.3's text and/or Table 7.3.3.	-	-	20/06/2023	Closed
53	BM (Epic)	v1d	5/05/2023	7.3. Preferred Remediation Option	Provide commentary on: (1) The validation plan and the sampling required to demonstrate that remaining insitu soils/surfaces have been remediated and are suitable for the proposed landuse (2) A contingency plan, if the selected remedial strategy fails	(1) See Section 9.7.1 "Validation Strategy" for commentary. (2) Section 8.5.2 "Remediation Contingencies" outlines the actions required if validation sampling indicates that additional remediation is required.	Noted.	-	-	20/06/2023	Closed

54	BM (Epic)	v1d	5/05/2023	7.3. Preferred Remediation Option	[Table 7.3.1] The selected remediation strategy for AEC03 to AEC08 is "Subject to a supplementary contamination assessment". Clarify what the supplementary contamination assessment (at each AEC) will comprise of, provide an indication of timing of these assessments, and how these assessments will impact the RAP. For example: - Will these assessments occur in a staged approach in conjunction with, or separate to, the proposed remediation of AEC09 to AEC21? - Will the (SE 2023) RAP require revision following the findings of the supplementary contamination assessment and selection of the remediation strategies for AEC03 to AEC08?	Amended - Table 7.3.2 added.	Noted that new Table 7.3.2 Contingency Remediation Strategies has been added to v1f. However, it is unclear how the further investigations / assessments occurring at AEC01 to AEC08 to characterise or identify impact are considered remediation strategies. Furthermore, the text does not appear to have been amended to address the Auditor queries.	Mention of AEC01-AEC08 has been removed from this RAP and will be addressed in additional assessments, outside of the scope of these remedial works. Pending characterisation of AEC01-AEC08, a RAP addendum may be required.	Table 7.3.2 Contingency Remediation Strategies revised to exclude AEC01-AEC08.	23/06/2023	Closed
55	BM (Epic)	v1d	5/05/2023	7.3. Preferred Remediation Option	[Table 7.3.1] (1) Update table to include new columns for: site location/address; and lot/plan details. This will assist in identifying the location(s) of the contamination risks, whereas site location has not been specified/stated in Column 2 (2) It is noted that AEC01 to AEC08, AEC16, AEC17, AEC19, AEC20 do not clearly specify the COPC. Either update all the rows to specify COPCs in Column 2, or insert a new column for COPCs	Amended. Table now includes columns for site address, lot & deposited plan and COCs and updated throughout document.	-	-	-	20/06/2023	Closed
56	BM (Epic)	v1d	5/05/2023	7.3. Preferred Remediation Option	[pg.23] Correct the reference to Figures 2 to 4.	Amended.	-	-	-	20/06/2023	Closed
57	BM (Epic)	v1d	5/05/2023	7.3. Preferred Remediation Option	It is noted that heavy metals and BaP is considered suitable for encapsulation. (i) Has the potential for leachability been considered for potentially migrating contaminants? (ii) Has the location and site context of the encapsulation area been assessed for durability and risk of flooding?	-SE note that heavy metals and Benzo(a)pyrene impacted soils will form the minority of soils buried within the containment cell. Additionally, approximately 33 % of the containment cell will be comprised of validated clean soils. Based on this, the potential for leaching any appreciable quantity of heavy metals or benzo(a)pyrene is not considered warranted.	(i) Noted. Item closed. However, for clarity and transparency, it is suggested that the additional rationale provided by SE (dated 02/06/23) be included into Section 7.3's text and/or Table 7.3.3. (ii) Clarify where in the report this has been addressed . Please clarify the basis of the cell will contain 33% of validated clean soils. What is the purpose of containment of the clean soil in a cell?	(ii) The proposed containment cell location has been proposed by CPBGGJV to TfNSW and durability and flood risk have been considered. The durability of the cell is considered to be appropriate for a containment cell as it proposed beneath a roadway that is expected to last > 100 years. The flood risk for the proposed cell location is considered to be low. As the containment cell will be constructed beneath the roadway hardstand and the cell will be constructed with 'clean' soils, any leachability impacts are considered to be extremely low. Based on previous communication on construction of the containment cell with the client, the cell would be comprised in layers comprising 200 mm contaminated fill followed by 100 mm 'clean fill' due to the need for heavy compaction. However, specs have since been reconsidered and heavy compaction is no longer required. Details of the containment cell are outlined in Section 8.3.	The Auditor notes that additional information supplied by SE (dated 22/06/23) will not be presented in the RAP.	23/06/2023	Closed
58	BM (Epic)	v1d	5/05/2023	General Comments - Section 8.0 Remedial Action Plan (RAP)	Suggest including a section to tabulate/summarise the key stakeholders/parties including contact details and their responsibilities, which will be involved in site remediation. Stakeholders/parties could include, but not be limited to : Client; Consultants (contamination, design of containment cell, etc); Auditor; Remediation Contractor; LAA; cartage company; offsite disposal facility; regulatory authorities; etc.	A register of contacts is provided in section 11.20.	-	-	-	20/06/2023	Closed
59	BM (Epic)	v1d	5/05/2023	8.1. Remedial Goal	(1) Typo error "... contaminated materials within the site, nothing-noting that this remedial" (2) Bullet 1 states "Section 10.7 Planning Certificate for the site". Clarify (in the text) whether 'the site' is referring to the lot/plan of the land parcel which will contain the containment cell, or something else	(1). Amended (2) Amended.	-	-	-	20/06/2023	Closed
60	BM (Epic)	v1d	5/05/2023	8.1. Remedial Goal	Please include reference to the CSSI conditions. Please include requirement for SAS.	Amended	-	-	-	20/06/2023	Closed

61	BM (Epic)	v1d	5/05/2023	8.2. Remediation Extents	(1) Update Table 8.2.1 with new columns for: site location/address; and lot/plan details. This will assist with identifying the location(s) of the contamination risks, where it has not be specified in Column 2. (2) It is noted that AEC01 to AEC08, AEC16, AEC17, AEC19, AEC20 do not clearly specify the COPC. Either update all the rows to specify COPCs in the existing Column 2, or insert a new column for COPCs (3) Update Table 8.2.1 to include approximate dimensions of stockpiles and excavations (e.g. surface area, and anticipated stockpile height or excavation depth)	Table now includes columns for site address, lot and deposited plan and COCs. (3) - please note that SE are using volume estimates.	(1) Table 8.2.1 does not present lot/plan details (2) Item closed (3) Noted that the volumes are estimated. Clarify how the estimated volumes were determined, survey or visual etc.	(1) Lot/plan details now presented in Table 8.2.1 (3) Volumes were determined based on previous assessments and assessments undertaken by SE. All estimates were visual and are considered to have been slightly overestimated to avoid volume constraints within the proposed cell locations.	-	23/06/2023	Closed
62	BM (Epic)	v1d	5/05/2023	8.2. Remediation Extents	(1) Remove all references to AECs that are not subject to remediation under this RAP. (2) Has appropriate contingency been allowed for in the development and design of a containment cell?	Section 8.3 "Containment Cell" states that "SE note that the client have provided additional proposed containment cell locations within the alignment in the event that additional unexpected finds are encountered..." acting as the contingency for the expected volume of contaminated material.	(1) Item closed (2) Noted.	-	-	20/06/2023	Closed
63	BM (Epic)	v1d	5/05/2023	General comments - Section 8.3 Containment Cell	The cell will require a detailed design drawing including a suitable cross section and layout. The key features should be depicted on the design drawings including height and surrounding roadway features to ensure constructability and durability. The construction of the cell will require a detailed survey to identify key aspects that will require documentation in <i>as constructed drawings</i> . The NSW EPA will require a registered surveyor to certify the as constructed drawings. Confirm that the design and construction of the proposed containment cell will comply with the (NSW EPA 2017) Contaminated Land Management Guidelines for the NSW Site Auditor Scheme (3rd Edition) and the (NSW EPA 2016) Environmental Guidelines - Solid waste landfills (2nd Edition). Discuss the relevant details in Section 8.3 and/or its sub-headings (e.g. (if relevant) leachate barrier system, leachate storage and disposal, stormwater management, monitoring requirements, etc.)	Cap and containment will be designed in-line with the SE note that the cap and containment system is not a 'landfill' under NSW legislation and therefore the NSW EPA 2016 guidelines are not applicable.	The current description of the encasulation cell is limited. The cell(s) should be developed to demonstrate that the design characteristics are adequate, suitable for the material and contaminants placed in the cells and the overall volume able to be accommodated in each cell. Please detail the areas and expected height of the the cells and specific placement controls. In order for the Cells to managed under a LTEMP, the asconstructed characteristics for each area is to be captured and recorded including details survey and survey certification. Please include expected volumes to be placed in each cell to demonstrate capacity. The RAP indicates that 3600m3 of material will be removed from the AECs. Due to the level of uncertainty identified it would be reasonable to suggest that this volume may be exceeded by more than 100%. Please confirm capacity of all nominated cell areas, based on expected design.	Amended and additional details added.	-	23/06/2023	Closed
64	BM (Epic)	v1d	5/05/2023	8.3. Containment Cell	(1) Typo error "... cell will be constructed within the site, and will comprise art of the fill area of the site" (2) In addition to Appendix A, use a locality plan to illustrate the location of the proposed containment cell in relation to the AEC09 to AEC21 (3) State the approximate dimensions of the proposed containment cell (4) Clarify if the 'designated area', that will store excavated and stockpiled contaminated fill, is a temporary structure and will be removed/demolished upon completion/filling of the proposed containment cell. Provide details of the design, construction, and (if relevant) demolition of the designated area.	(1) amended. (2) (3) Final containment cell design will be subject to final volume of impacted material. Dimensions will be subject to this change and provided. (4) 'designated area' is a temporary stockpiling area that will be removed/deconstructed following the completion of the containment cell.	(1) Item closed (2) Clarify where this has been addressed in the report (3) Item closed (4) Item closed	2) Amended as Figure 14	Containment cell locations are shown in new Figure 10.	23/06/2023	Closed
65	BM (Epic)	v1d	5/05/2023	8.3. Containment Cell	Sections 8.3 and 8.3.1 both use the term "clean fill" to describe material which will be used to construct the cell's perimeter batter and used for compaction purposes. Specify what constitutes 'clean fill' (e.g. onsite excavated natural material (ENM), imported virgin excavated natural material (VENM), material which comply with COPC criteria, certified soils, etc.)?	Amended	-	-	-	20/06/2023	Closed
66	BM (Epic)	v1d	5/05/2023	8.3.1. Compaction	Incorrect table reference.	Amended	-	-	-	20/06/2023	Closed
67	BM (Epic)	v1d	5/05/2023	8.3.3. Capping	States "... layer of validated 'clean' materials will be ...". Specify what types of materials would constitute 'validated clean material'?	Amended.	-	-	-	20/06/2023	Closed
68	BM (Epic)	v1d	5/05/2023	8.4.1. Notifications and Approvals	Specify who responsible for notifications and obtaining approvals. Please clarify 'likely to be classified as Class 2' please document how this designation can be confirmed in the RAP.	Amended.	Information presented in RAP v1f appears similar to previous RAP v1d report. Unclear where amendment has been made in RAP v1f	Information on Category 2 classification for the project provided.	-	23/06/2023	Closed

69	BM (Epic)	v1d	5/05/2023	8.5. Remedial Works	[Table 8.5.1] (1) Amend to include columns for: site location/address; lot/plan details; and AEC ID number. (2) It is noted that AEC01 to AEC08, AEC16, AEC17, AEC19, AEC20 do not clearly specify the COPC. Either update all the rows to specify COPCs in the existing Column 2, or insert a new column for COPCs (3) The last 3 rows of Table 8.5.1 appears to be contingences. Please only include actual known and scoped works in the Remedial works schedule.	Amended.	-	-	-	20/06/2023	Closed
70	BM (Epic)	v1d	5/05/2023	8.5. Remedial Works	[pg 29] The proposed remedial strategy (stated in Column 2) for the contamination risk of "Soil: Direct contact risks (Heavy Metals, BTEX, TRH, PAH, OCP, PCB) (if identified)" is not consistent with the information presented in Table 7.3.1	Amended to include 'off-site disposal' only.	-	-	-	20/06/2023	Closed
71	BM (Epic)	v1d	5/05/2023	8.5.2.1. AEC09, AEC10, AEC11, AEC12, AEC13, AEC14, AEC15, AEC16, AEC17, AEC18, AEC19, AEC20, AEC21 – Validation Results Above Site Adopted Criteria	States "Following further removal of material, additional validation samples will be taken of the <u>dam walls</u> ". Clarify what is meant by "dam wall" - please resolve.	Amended.	-	-	-	20/06/2023	Closed
72	BM (Epic)	v1d	5/05/2023	General Comment - Information common with the Draft Stage 2 DSI report	It is noted that the following sections of the RAP have the same , or very similar, information/data which was previously presented in the (SE 2023) Draft "Stage 2 - Detailed Site Investigation (DSI) (revision v1d) report : 9.0, 9.1, 9.2, 9.4, 9.5, 9.6, 9.7, 9.7.3, 9.7.5, and 9.7.6. Please update these RAP sections to address the auditor comments summarised in IAA001- DSI v1d.	Amended to be consistent with the Stage 2 DSI.	It is noted that the following sections of the RAP have the same , or very similar, information/data which was previously presented in the (SE 2023) Draft "Stage 2 - Detailed Site Investigation (DSI) (revision v1d) report : 9.0, 9.1, 9.2, 9.4, 9.5, 9.6, 9.7, 9.7.3, 9.7.5, and 9.7.6. Please update these RAP sections to address the auditor comments summarised in IAA001- DSI v1f.	Changes based on the DSI comments amended. Any references to PAECs and AECs will be amended in the DSI to avoid confusion in the RAP.	-	23/06/2023	Closed
73	BM (Epic)	v1d	5/05/2023	8.6 unexpected finds Protocol	An unexpected Finds protocol is a requirement of CSSI Condition E89 and E90. Large infrastructure project typically prepare a Stand Alone Asbestos and contaminated land protocol that are used project wide for the duration of the project. Please confirm that these documents have not already been prepared as part of the Construction Environmental Plan (CEMP) and Contaminated land Sub-plans. If so please refer to these documents.	The unexpected finds protocol is listed in <u>Section 8.6 of this RAP</u> . A Stand Alone Asbestos and contaminated land protocol have not been prepared in conjunction to the CEMP (CPBGG 2022).	Noted.	-	-	20/06/2023	Closed
74	BM (Epic)	v1d	5/05/2023	9.1 Step 1	Please review statements regarding regulatory authorities and include requirements of the CSSI.	SE considered 9.1. Step 1 to be consistent. Discussion on the requirements of the CSSI have been discussed multiple times before in the text.	-	-	-	20/06/2023	Closed
75	BM (Epic)	v1d	5/05/2023	9.3 Step 3	Please include the detailed design aspects of the containment cell. Please include NSW EPA regulatory requirements for the cell.	Amended.	Information presented in RAP v1f appears similar to previous RAP v1d report. Unclear where amendment has been made in RAP v1f	Amended.	Closed based on the revisions made to Section 8.3. Containment Cell	-	Closed
76	BM (Epic)	v1d	5/05/2023	9.4. Step 4: Define the boundaries of the study	[Par.5, vertical extent] It is noted that the Stage 2 DSI (Rev v1d) stated "The vertical extent that contamination is expected to be distributed across, based on the conceptual site model and the project scope, is likely to be limited to shallow soils and fill material". The statement in the RAP does not mention shallow soils and fill material. Please resolve this inconsistency. last paragraph includes a reference to Investigation .. please amend	Amended.	-	-	-	20/06/2023	Closed

77	BM (Epic)	v1d	5/05/2023	9.7.1. Validation Sampling	[Table 9.7.1] (1) Amend Table 9.7.1 to include columns for: site location/address; and lot/plan details (2) It is noted that AEC01 to AEC08, AEC16, AEC17, AEC19, AEC20 do not clearly specify the COPC. Either update all the rows to specify COPCs in the existing Column 2, or insert a new column for COPCs (3) The validation methodology for AEC09 to AEC21 is described as "Where impacted soils are removed outside of the proposed containment cell: 1 x soil sample per 10 lineal metres of excavation wall, with a minimum of 1 per wall and 1 x soil sample per 25 m2 of excavation footprint.....". Clarify what this means. Is this to be interpreted as "Where impacted soils are removed/excavation and disposed into the contaminated cell, the soils remaining insitu at the AEC will be validated as follows: 1 x soil sample per 10 lineal metres of excavation wall, with a minimum of 1 per wall, and 1 x soil sample per 25 m2 of excavation footprint"?	Amended.	(1) Item closed (2) Table 9.7.1 Validation Methodology includes information for AEC01 to AEC08. These areas require further assessment and this information should not be presented in Section 9.0 Remedation & Validation DQOs (3) The validation methodology for AEC09 to AEC21 is described as "Where impacted soils are excavated and disposed into the containment cell, the soils remaining insitu at the AEC will be validated as follows: 1 x soil sample per 10 lineal metres of excavation wall, with a minimum of 1 per wall, and 1 x soil sample per 25m2 of excavation footprint with a minimum of 3". This does not appear to be consistent paragraph 3. Please clarify.	(2) AEC's yet to be addressed have been removed. (3) Paragraph 3 amended.	-	23/06/2023	Closed
78	BM (Epic)	v1d	5/05/2023	9.7.1. Validation Sampling	(1) Include the requirement to undertake a review of the source site history to confirm the COPC required for any sampling. (2) Also confirm that manufactured topsoil will not be imported to the remediation site, or if manufactured topsoil is proposed detail the requirements for acceptance. (3) [pg.38] Clarify who is responsible for undertaking the observations and evaluating whether collection of additional validation sampling will occur	Amended.	(1) Unclear where Section 9.7.1 has been amended to address the comment (2) Item closed (3) [Pg.45] Unclear where Section 9.7.1 has been amended to address the comment	(1) "A review of the source site history to confirm the COPC required for any sampling is to be undertaken by the supervising environmental consultant" is present as paragraph 6 within Section 9.7.1. (3) Amended within paragraph 4 in Section 9.7.1.	-	-	Closed
79	BM (Epic)	v1d	5/05/2023	9.7.4. Headspace Screening	(1) Based on Section 12.5 of the (SE 2023) Stage 2 DSI, it is understood that TRH >C10-C16 (F2) exceeded the adopted ESL criteria at sampling locations SP14-01 to SP14-03 only. However, the SP14 log (in Appendix B, (SE 2023) Stage 2 DSI) indicates no odours were observed. Table 5.1.1 currently indicates volatiles are a COPC at AEC04 and AEC06 - these locations were not investigated as part of the Stage 2 DSI, and are earmarked for 'supplementary contamination assessment'. Identify the AEC, SP14 belongs to. (2) Make comment on: which AECs will be field screened; and PID calibration requirements.	(1) - Section 13.5 under the Discussion of the (SE 2023) Stage 2 DSI states that the three samples taken from SP14 met the criteria for a 95% Upper Confidence Limit calculation. The result of which was below the relevant ESL criteria (60 mg/kg c.f. 120 mg/kg - TRH (F2)). SP14 is therefore not included in any AEC. (2) Amended and included.	-	-	-	20/06/2023	Closed
80	BM (Epic)	v1d	5/05/2023	9.7.7. Laboratory Analytical Schedule	[Table 9.7.2] (1) Please include only relevant AEC subject to remediation. (2) Information presented for AEC09 in Table 9.7.2 (i.e. columns 3 & 4) is not consistent with Table 9.7.1. Resolve and amend. (3) Please include a minimum sample number for all relevant AECs	Amended.	-	-	-	20/06/2023	Closed
81	BM (Epic)	v1d	5/05/2023	9.7.8. Laboratory Holding Times, Analytical Methods and Limits of Reporting	Both Table 9.7.3 and Table 9.7.4 list analytes E.Coli and faecal coliforms. These analytes are not listed as COPC in Table 5.1.1. Please clarify and resolve as required.	These analytes have been added to Tables 9.7.3 and 9.7.4 in the case of any unexpected finds that may require sampling for such contaminants, as such they are not required in Table 5.1.1.	Noted. Item closed. However, for clarity and transparency, it is suggested that the additional rationale provided by SE (dated 02/06/23) be provided below Tables 9.7.3 and 9.7.4.	-	-	20/06/2023	Closed
82	BM (Epic)	v1d	5/05/2023	10 REPORTING	In accordance with Table 2.6 of the "NSW EPA Contaminated Land Guidelines - Consultants reporting on contaminated land" include a section in the Site Validation Report (SVR) for: a brief summary of previous results of JBS&G, Coffey and SE's Stage 2 DSI.	Amended.	-	-	-	20/06/2023	Closed
83	BM (Epic)	v1d	5/05/2023	11. SITE MANAGEMENT PLAN	It is expected that a comprehensive CEMP and Contaminated land Sub-plan has been prepared by the Project in accordance with the CSSI. Please refer to the appropriate plan and subplans and protocols and confirm that the information contained in the RAP is consistent with the approved CEMP.	Amended - referenced to CEMP. Subplans included in CEMP	New last sentence is incomplete.	Amended.	Incomplete sentence removed/deleted.	-	Closed

84	BM (Epic)	v1d	5/05/2023	11. SITE MANAGEMENT PLAN	Make comments on: (1) Who are the responsible party(s) to implement aspects of the Site Management Plan (2) Record keeping (3) Material tracking for: soil and/or asbestos material removed as part of remediation activities (both disposed to the (onsite) containment cell and offsite disposal facility(s)); and liquids from dewatered excavations (4) Remediation schedule (5) Contingency plans to respond to site incidents, to remove potential effects on surrounding environment and community (6) Inductions, toolbox talks (7) Staged progress reporting (if appropriate) (8) Outline of environmental management plan (EMP) for ongoing management of contamination at the site (if needed) and the onsite containment cell	(1) Amended in 11.0 introduction. (2) (3) Amended. Referred to within 11.2 Waste Management. (4) Remediation schedule is outlined as a portion of Bulk Earthworks schedule within the CEMP (5) Our contingencies are outlined within the unexpected finds protocol, CEMP outlines further. (6) Inductions and toolboxes are outlined in the CEMP. (7) Staged progress reports are outlined within Asbestos Clearances, SCAs, WCAs, Asbestos Inspections and Letters provided to the client as works continue (8) EMP and potential LTEMP are subject to completed works and outlined within the CEMP.	Noted. Item closed. [Items 4 to 8] However, for clarity and transparency in this RAP, it is suggested that the additional information provided by SE (dated 02/06/23) be provided as statements in the relevant sections of the RAP.	-	-	20/06/2023	Closed
85	BM (Epic)	v1d	5/05/2023	11.1. Soil and Stormwater Management	Make comments on: - How stormwater coming onto the remediation site(s) from adjacent properties will be managed (i.e. stormwater diversion around onsite remediation areas, etc.) - Will stormwater be treated onsite prior to discharge to the Council stormwater system, etc.?	Amended.	[new Section 11.8 Stormwater Management] Provide a copy of the (CPBGG 2022) CEMP and any subplans.	Appended.	Included in Appendix C	23/06/2023	Closed
86	BM (Epic)	v1d	5/05/2023	11.1.1. (Soil & Stormwater Management) Site Access/Egress	[Par.3] Clarify if a designated washdown area will be utilised as part of the proposed remediation and validation work. If relevant, make comment on the proposed designated washdown area's: location; construction; operation; maintenance/clean-out; etc.	Amended.	Information presented in paragraph 3 appears unchanged since v1f. Please clarify where (in the RAP) this Auditor comment has been addressed.	Detailed further in Section 11.1.1	-	23/06/2023	Closed
87	BM (Epic)	v1d	5/05/2023	11.1.3. Excavation Pump Out	[Par.1] States "Should excavations require pumping out, water will be analysed for total suspended solids, pH, metals and petroleum hydrocarbons. Should analytical results be less than relevant marine ecosystem groundwater investigation levels in ANZWQG (2018), excavation water may be discharged to stormwater." (1) Clarify if there will testing/analysis will be conducted on samples collected directly from the excavations, or alternatively, if excavations will be dewatering and samples collected from a temporary onsite storage, etc. (2) Clarify if the local receiving waterways (Mulgoa Creek and Cosgroves Creek) are considered to be representative of marine ecosystems.	(1) Amended. In-situ sampling may occur where time-constraints allow, however, the need for expediency in excavation works may require temporary on-site storage for sampling and following pump-out. (2) Local receiving waterways are freshwater ecosystems, this has been amended.	(1) Please clarify where (in the RAP) this Auditor comment has been addressed (2) Item closed	Detailed further in Section 11.1.3	-	23/06/2023	Closed
88	BM (Epic)	v1d	5/05/2023	11.4. Regulatory Notification (if required)	Specify who is responsible for the submission of the notification of intent to remove ACM to the regulator.	Amended.	-	-	-	20/06/2023	Closed
89	BM (Epic)	v1d	5/05/2023	11.7. Groundwater Management	(1) [Par.1] Specify who is responsible for: obtaining consent from the planning consent authority; and obtaining approvals from the NSW Department of Planning and Infrastructure, and the NSW Department of Primary Industry – Water (2) Make comment on whether groundwater will be sampled and analysed to assess suitable disposal options, and list the analytes/COPCs which will be analysed	Amended. The Principal Contractor is responsible for correspondence with relevant authorities regarding dewatering of site.	-	-	-	20/06/2023	Closed
90	BM (Epic)	v1d	5/05/2023	11.12. Vibration Management	(1) Identify and list the areas/locations of the assets that may be susceptible to potential damage (2) Make comments on what vibration management controls will be implemented, and what sort of monitoring will be implemented	Amended.	[changed to 11.13] Provide a copy of the (CPBGG 2022) CEMP and any subplans.	Appended.	Included in Appendix C	-	Closed
91	BM (Epic)	v1d	5/05/2023	12. CONCLUSIONS	In accordance with Table 2.5 of the "NSW EPA Contaminated Land Guidelines - Consultants reporting on contaminated land" please also include: - A list summarising the activities and physical changes proposed for the site - A summary of proposed limitations and constraints on the use of the site post remediation, and the proposed EMP for long-term management of residual contamination at the site (e.g. onsite containment cell)	Amended.	The conclusion needs to address the following disconnect. Section 1.3 Objectives indicates this RAP v1f has been prepared to facilitate the construction of the M12 (West) Motorway and address the issues that have been identified within the alignment. However, Sections 6 to 9 focus on the remediation and validation of the IAs of AEC09 to AEC21. As AEC01 to AEC08 require further contamination assessment/characterisation. Thus, provide further clarification and details on how areas AEC01 to AEC08 will be managed in terms of future investigations, reporting, RAPs, etc.	Detailed within (new) dot points 1 and 2	-	-	Closed

92	BM (Epic)	v1d	5/05/2023	13 STATEMENT OF LIMITATIONS	[Par.2] States "This report has been prepared solely for the use of the client to whom it is addressed and no other party is entitled to rely on its findings". The current wording appears to preclude NSW EPA and its representatives such as the Auditor, and other government departments, from relying on the information provided in this report. Please amend.	Amended as per the DSI.	-	-	-	20/06/2023	Closed
93	BM (Epic)	v1d	5/05/2023	14 REFERENCES	Third reference appears to present the same information as the first reference. Please confirm if this is double up. Make required amendments in Section 14.0 and the report text.	Amended. Amended in Section 4 also.	-	-	-	20/06/2023	Closed
94				TOC - List of Figures	-	-	Figures 1 to 13 are provided in the Figures Section of the RAP report. These figures are inconsistent with those listed in the Table of Contents (TOC). Please amend TOC and check cross-referencing in the report text.	Amended.	-	-	Closed
95				5.9 Recreational Water Use	-	-	[Paragraph 2] Clarify or amend the sentence "..... extraction and subsequent <u>recreational use as part of irrigation systems</u>" Please indicate water courses on the figures.	Amended.	-	-	Closed
96				7.2. Remediation Options for Impacted Soils			[new Table 7.3.2 Contingency Remediation Strategies] Clarify that the contingency remediation strategies of "Soil: Direct contact risks", "Soil: Ecological risks", "Soil: Inhalation risks", and "ACM" (presented at the end of the table) are applicable to all the locations of AEC03 to AEC08.	Amended to remove AEC01-AEC08. Contingency still in place to address potential unexpected finds within the site.	-	-	Closed