

JBS&G 64625 – 161583

**L001 (Interim Audit Advice) Detailed Remediation Design SAQP – Captains Flat Rail Corridor**

6 August 2024

Gaynor Blackadder  
Project Officer – Contaminated Lands  
Regional Property & Asset Renewal / Network & Assets / Regional and Outer Metropolitan  
Via email: Gaynor.blackadder@transport.nsw.gov.au

**L01 Interim Audit Advice (0503-2106)– Detailed Remediation Design SAQPs – Captains Flat Rail Corridor, Captains Flat**

Dear Gaynor,

**1. Introduction and Background**

Andrew Lau, of JBS&G Australia Pty Ltd (JBS&G), has been engaged by Transport for NSW (TfNSW, the client) to provide site audit advice in relation to the Captains Flat Rail Corridor, in the Country Regional Network (CRN) at Copper Creek Road, Captains Flat, New South Wales (NSW) (the site).

Andrew Lau is a Site Auditor accredited by the NSW Environment Protection Authority (EPA) under the *Contaminated Land Management Act 1997* (CLM Act 1997) (Accreditation Number 0503).

This interim audit advice (IAA) has been undertaken in accordance with the requirements provided by the client, to provide independent review of the Detailed Remediation Design Sampling Analysis and Quality Plan (DRD SAQP) prepared as part of the environmental investigation program being undertaken by the Client. The objective of this review was to assess the adequacy of the DRD SAQP program.

This review has been completed in accordance with the requirements of the *National Environment Protection (Assessment of Site Contamination) Measure 1999* (NEPM) (NEPC 2013) and *PFAS National Environmental Management Plan* (HEPA 2020).

**2. Documentation Reviewed**

This interim audit advice letter is based on a review of the documents listed below:

- *Detailed Remediation Design, Sampling Analysis and Quality Plan, Captains Flat Rail Corridor, Ramboll, Revision 2, 20 June 2024 (Ramboll 2024).*
- *Comments Register – SAQP, Rev 2, Captains Flat Rail Corridor, 29 April 2024.*

Review of the documents/reports has been undertaken against the requirements of and the *National Environment Protection (Assessment of Site Contamination) Measure 1999* (NEPC 2013), *PFAS National Environmental Management Plan* (HEPA 2020) and *Consultants Reporting on Contaminated Land: Contaminated Land Guidelines* (NSW EPA 2020). The client provided the *PFAS Investigation Framework* (the Department 2022) which sets out the general requirements for the assessment and audit of the PFAS investigations completed under the Program.

### 3. Auditor Opinion on the DRD SAQP

Based on the information reviewed as part of this Interim Audit Advice and subject to the limitations in **Attachment 1**, it is considered that the comments raised by the Auditor on Revision 1 of the DRD SAQP have all been adequately addressed in the final Revision 2 version of the report. The Auditor considers that the DRD SAQP is appropriate in its current form based on the following:

- The auditor considers that the list of COPCs (heavy metals, specifically lead, arsenic, chromium, copper, nickel and zinc), together with the Conceptual Site Model (CSM), associated potential contaminated media (soil and surface water) and subsequent preferential pathways identified by the consultant (Ramboll 2024) is adequate to assess the nature and extent of contamination across the site in accordance with the VMP (EPA 2021<sup>1</sup>). The auditor considers that potential source-pathway-receptor linkages have generally been adequately addressed. The CSM prepared by the consultant (Ramboll 2024) was sufficiently detailed and meets the requirements of the NEPM 2013.
- The soil criteria adopted by the consultant (Ramboll 2024) for the assessment of human health and ecological risk have been checked against and were consistent with criteria approved by the EPA and considered appropriate for the proposed open space land use. Overall, the auditor considers that the criteria adopted by the consultant were appropriate for assessing the nature and extent of contamination present within the site.
- The QA/QC measures proposed to be employed by the consultant (Ramboll 2024) were checked and found overall, to adequately comply with the requirements outlined in EPA (2020), EPA (2017) and NEPC (2013).
- It is considered that the proposed extent of site works (Ramboll 2024) will enable lateral extent of soil contamination within around the Copper Creek culvert embankment to adequately inform remediation. The auditor considers that if the data meets the requirements described, that the data will be suitably reliable and usable for the purpose of this audit.
- Relevant site plans provided by the consultant (Ramboll 2024) adequately identified the proposed sampling locations relevant to the main site features, historical sample locations, remediation areas, boundaries and street frontages.
- Proposed laboratory procedures, as well as confirming a positive correlation between field fpXRF and lab lead concentrations, are generally appropriate for the identified potential contaminants of concern and the adopted soil criteria against which the results are to be compared.

Please note that this interim advice does not constitute a Site Audit Statement or a Site Audit Report but is provided to assist in the assessment and management of contamination issues at the site in regard to requirements of the site audit. The information provided herein should not be considered pre-emptive of the final audit conclusions, but rather represent the findings of the audit based on a preliminary review of available site information. Furthermore, the interim advice should not be regarded as approval of any proposed investigations or remedial activities, as any such approval is beyond the scope of an independent auditor.

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<sup>1</sup> *Voluntary Management Proposal*, Under the Contaminated Land Management Act 1997, Part 1, Environment Protection Authority, 25 June 2021 (EPA 2021).

Should you require clarification, please contact the undersigned on 0412 512 614 or by email [alau@jbsg.com.au](mailto:alau@jbsg.com.au).

Yours sincerely:

A handwritten signature in black ink, appearing to read "Andrew Lau".

Andrew Lau

NSW EPA Accredited Auditor

Accreditation Number 0503

**JBS&G Australia Pty Ltd**

Attachments:

1) Limitations

## Attachment 1 - Limitations

This audit was conducted with a reasonable level of scrutiny, care and diligence on behalf of the client for the purposes outlined in relevant legislation/regulations. The data used to support the conclusions reached in this audit were obtained by other consultants and the limitations which apply to the consultant's report(s) apply equally to this audit report.

Every reasonable effort has been made to identify and obtain all relevant data, reports and other information that provide evidence about the condition of the site, and those that were held by the client and the client's consultants, or that were readily available. No liability can be accepted for unreported omissions, alterations or errors in the data collected and presented by other consultants. Accordingly, the data and information presented by others are taken and interpreted in good faith.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements.

Limited sampling and laboratory analyses were undertaken as part of the investigations reviewed, as described herein. Ground conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this audit are based on the information obtained at the time of the investigations.