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106 GOULBURN STREET, TARAGO INTERIM ENVIRONMENTAL MANAGEMENT PLAN

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1. INTRODUCTION

Ramboll Australia Pty Ltd (Ramboll) was commissioned by Transport for NSW (TfNSW) to prepare an Interim Environmental Management Plan (IEMP) for the management of risks associated with heavy metals contamination identified by Ramboll (2020a and 2023) at the residential property known as the 'former Station Master's Cottage' located at 106 Goulburn Street, Tarago NSW (the site). The site is owned by the Transport Asset Holding Entity (TAHE) and is no longer used for residential purposes.

The site is located adjacent to a former ore concentrate load-out facility and rail corridor on the Country Regional Network (CRN). The former load-out facility and surrounding rail corridor was declared significantly contaminated by the NSW EPA in March 2020 due to the presence of metals, comprising predominantly lead, at concentrations representing human and ecological health risks. The site comprising the former Station Masters Cottage was declared as significantly contaminated in August 2022 due to contamination from the adjacent former load-out facility and rail corridor.

In November 2019 the adjacent rail corridor was notified to the NSW Environment Protection Authority (EPA) under Section 60 of the *Contaminated Land Management Act 1997* (CLM Act) and on 25 March 2020 the NSW EPA declared the adjacent rail corridor to be significantly contaminated under Section 11 of the CLM Act (Declaration Number: 20201103; Area Number 3455). The adjacent rail corridor was published on the EPA's list of notified sites as "contamination is regulated by the EPA under the CLM Act". The declaration defines the substance of concern in soil ("the Contaminant") to be lead and that contamination had migrated from the adjacent rail corridor to the site. TfNSW entered into a Voluntary Management Agreement which included commitment to develop an Action Plan for interim management of contaminant exposure risks to receptors outside of the rail corridor. In 2020 the Tarago Lead Management Action Plan was prepared and accepted by the NSW EPA including management measures to mitigate risks to receptors within the surrounding environment. Additionally, in 2021 TAHE acquired the site for planned reintegration within the CRN. The implementation of the Tarago Lead Management Plan (Ramboll 2020) remains relevant to management of contaminant exposure risks at the site.

On 3 August 2022 the NSW EPA declared the site to be significantly contaminated under Section 11 of the CLM Act (Declaration Number: 20221105; Area Number 3455). The site was published on the EPA's list of notified sites as "contamination is regulated by the EPA under the CLM Act". Further sampling of surface and shallow soils undertaken in mid-2023 identified that zinc and copper were present at concentrations which could represent a risk to ecological communities (Ramboll, 2023). The EPA describes that remediation will be required to facilitate residential land-use in accordance with current zoning under the Goulburn-Mulwaree Council LEP (2009). It is noted that TAHE acquisition may facilitate remediation through long-term management.

TfNSW will retain responsibility for ensuring that this IEMP is implemented, through delegation to the rail corridor manager for the CRN (UGL Regional Linx (UGL)). Further detail on roles and responsibilities is presented in **Section 2**.

A site locality plan is presented in **Figure 1, Appendix 1**.

1.1 Purpose

The purpose of this IEMP is to provide interim management measures to mitigate risks from exposure to contaminants onsite until a long-term remedial strategy is implemented. This IEMP describes passive controls to mitigate contaminant exposure risks. This plan shall be integrated with UGL management systems for the CRN. UGL will be responsible for its implementation.

This IEMP contains controls for workers and site visitors undertaking periodic inspection and above ground maintenance. Activities required at the site that are additional to inspection and above ground maintenance would require additional management requirements and a specific management plan for the activity should be developed.

1.2 Site Description

The site is a residential block comprising the former Station Master’s Cottage and a semi-detached carport and shed. The main residence comprises a single-story brick house with brick pier foundations. Sub-floor accessibility is considered to be limited with no observed access points, limited clearance and concrete slab present in the rear sunroom, laundry, front verandah and carport. The yard area is fully fenced and generally grassed however part of the Lot is located outside the eastern fence line.

Site details are summarised in **Table 1-1** below.

Table 1-1: Site Identification

Information	Description
Street Address:	106 Goulburn Street, Tarago NSW
Identifier:	Lot 1 Deposited Plan (DP) 816626
Site Area:	Approximately 1,550 m ²
Local Government:	Goulburn Mulwaree Shire Council
Owner:	Transport Asset Holding Entity (TAHE)
Current Site Use:	Vacant (not currently occupied)

The site includes the entire Lot including the area outside the eastern fence line.

1.3 Current Site Use

Until recently the site was generally used as a private residence except for the area outside the eastern fence cleared and generally accessible by the public as an extension of grassed area adjacent the intersection of Goulburn Street and Boyd Street. After the adjacent rail corridor was deemed significantly contaminated by the NSW EPA (Declaration Number: 20211103) on 25 March 2020, TfNSW relocated the residents and TAHE purchased the property. The site is currently unoccupied and under care and maintenance until a remediation or management strategy has been developed and implemented.

Surrounding land use includes:

- North: Rail corridor.
- East: Goulburn Street then residential and commercial land parcels.
- South: Rail corridor (Tarago Train Station).
- West: Rail corridor.

1.4 Topography and Hydrology

The site slopes gently east toward the Mulwaree River consistent with surrounding topography which is characterised by roadside table drains and swales in parkland directing surface water north-east from the site.

It is considered likely that surface water will infiltrate site soils during low – moderate rainfall events and flow east to Goulburn Street drains (similar to the surrounding rail corridor) during high rainfall events.

1.5 Geology

Review of the Australian Geoscience Information Network (AUSGIN) portal (<http://portal.geoscience.gov.au/> accessed 8/1/2020) identified regional geology including channel and flood plain alluvium (gravel, sand and clay) locally formed as calcrete overlying quaternary sedimentary rock.

1.6 Hydrogeology

Review of the Department of Regional NSW (Mining, Exploration and Geoscience) MinView portal (<https://minview.geoscience.nsw.gov.au/>) identified 12 wells within a 500 m radius from the site. Review of drilling and construction details for registered wells indicates the shallowest regional aquifer is present in gravel layers from 5.5 – 18.6 mbgl with deeper aquifers present in fractures of underlying shale, siltstone and limestone from 50 – 74 mbgl.

During previous site assessment (Ramboll 2020a) a groundwater well was observed in the south-east area of the fenced yard. The well was sampled and based on subsequent analyses groundwater was considered suitable for use in irrigation, livestock watering and once settled of suspended sediment, for domestic potable use.

1.7 Residual Contamination

Investigations of the site (Ramboll 2020a and 2023) identified lead at levels exceeding relevant assessment criteria protective of human health under a residential land use scenario, specifically:

- Concentrations of lead (mg/kg) exceeding human health criteria were found in soils less than 0.4 metres below ground level (mbgl).
- Concentrations and loadings of lead ($\mu\text{g}/\text{m}^2$) exceeding human health criteria were found in dust on interior and exterior surfaces of the house.
- Concentrations of lead indicative of lead-based paints were found in flaking paint on the front verandah of the house.

It is understood that no contamination outside the house has been remediated and no removal of dust from inside the house has occurred.

The distribution of contaminant concentrations exceeding adopted human health and ecological guidelines are shown in **Figure 1 and 2, Appendix 1**.

It is noted that concentrations of lead in surface soil on site outside the eastern fence line (SS116, HA01 and HA02) reported concentrations ranging between 190 mg/kg and 330 mg/kg, the maximum (HA01) being marginally above the Health Investigation Levels for low density residential land use (300 mg/kg). All three samples were below public open space land use (600 mg/kg). This is consistent with results of other sampling along Goulburn and Boyd Streets reported in the Detailed Site Investigation of the broader community (Ramboll 2020b, Ramboll 2021). On this basis the contaminant exposure risk onsite outside the eastern fence is low and does not require management. It is also noted that the Tarago Lead Management Action Plan (Ramboll 2022) defines control measures to mitigate potential exposure risks in the broader community, related to contamination at or originating from the Tarago Rail Yard.

Concentrations of lead, zinc and copper are present in shallow soils at levels which may pose a risk to ecological health (Ramboll 2020a and 2023). Ecological communities are considered to include transient wildlife, and grass and shrubs.

1.8 Operation of the IEMP

The requirements of this IEMP apply to the management of contamination on site and the potential for contaminant migration, comprising of metals, to and from the site.

This IEMP applies currently and will remain in place until a long-term plan is developed and implemented or until the site has been remediated and validated as no longer representing a risk to human health or the environment.

2. MANAGEMENT FRAMEWORK

2.1 Roles and Responsibilities

All site personnel (including TfNSW, UGL and their contractors) have a responsibility for protecting human health and the environment. The key roles and responsibilities for this IEMP are presented in **Table 2-1**.

Table 2-1: Roles and Responsibilities

Role	Responsibility
TfNSW Project Manager – Land Management (or appointed delegate)	<ul style="list-style-type: none"> • Maintain ultimate responsibility for the implementation of this IEMP for the site (including through appointment of contractors as appropriate). • Responsible for revisions and amendments to this IEMP if site conditions change or other amendment to the IEMP is required. • Track all management of the revisions and amendments, and ensure amendments are communicated to all stakeholders. • Undertake all stakeholder management including liaison with regulatory bodies and follow-up of all external complaints. Co-ordinate for this LTEMP to be attached to the s10.7 planning certificate.
Environment Manager and UGL Property Manager	<ul style="list-style-type: none"> • Ensure that all employees, contractors and consultants engaged in activities at the site are inducted to this IEMP and are aware of the requirements of the IEMP and their specific responsibilities under the IEMP. • Implement controls to mitigate risks associated with exposure of members of the public to site contamination. • Ensure compliance to the requirements of this IEMP through surveillance and monitoring of consultants and contractors completing maintenance work. • Review effectiveness of this IEMP following any incident or any other event that suggests this IEMP is ineffective and report to TfNSW. • Undertake corrective actions to rectify non-conformances or complaints (in conjunction with WHS Representative). • Provide advice on environmental issues and incidents as necessary. • Undertake monitoring and reporting requirements outlined in this IEMP. • Maintain records that demonstrate the implementation of this IEMP. • Ensure utility owners are aware of the IEMP requirements for entering the site. • Ensure all site personnel are trained, having regard to the nature of the work, risks associated with the work and the control measures implemented. • Ensure all site personnel are consulted about the work that is to be carried out in relation to health and safety matters.
UGL Property Manager, nominated supervisor and all site personnel	<ul style="list-style-type: none"> • Implement IEMP controls during all maintenance work at the site. • Monitor and report (where relevant) on environmental and safety hazards, impacts or improvements to work activities. • Timely reporting of non-conformances or complaints to UGL or concerns regarding the implementation of this IEMP. • Undertake corrective actions to rectify non-conformances or complaints (in conjunction with Site Supervisor). • Take reasonable care for their own health and safety and for the health and safety of their co-workers. With specific regard for this IEMP all workers have a responsibility to implement controls as relevant to their site duties and to report any non-conformances with this plan to the UGL Project Manager / Site Supervisor.

2.2 Legislative and Regulatory Framework

This IEMP has been prepared to address the requirements of relevant legislation and codes. The key pieces of legislation applicable to this IEMP are:

- NSW Work Health and Safety Act 2011.
- NSW Work Health and Safety Regulation 2017.
- Protection of the Environment Operations Act 1997.
- Protection of the Environment Operations (Waste) Regulation 2014.
- Contaminated Land Management Act 1997.

The key codes of practice are:

- NSW EPA Preparing environmental management plans for contaminated land practice note (NSW EPA 2022).
- NSW EPA LeadSmart – Work Smart: Tradespeople and Mining Industry Workers (<https://leadsmart.nsw.gov.au/wp-content/uploads/2016/09/LeadSmart-Brochure-Working.pdf>).
- SafeWork Australia (2018) Code of Practice How to manage work health and safety risks.
- SafeWork NSW (2019) Code of Practice How to manage work health and safety risks.

2.3 Periodic Review

This IEMP must be reviewed yearly by UGL from date of issue or when:

- Requested by TfNSW.
- Requested by a health and safety representative from UGL.
- Prior and following contaminated material being removed, disturbed, sealed or enclosed.
- Changes to land use occur.
- A non-conformance or deficiency with the IEMP is identified.
- When a longer-term lead management plan is in place.
- Remediation has been completed and validation has concluded long term management is not required.

2.4 Non-Compliance and Corrective Actions

Where non-compliances and/or corrective actions are identified these must be communicated to the UGL Site Supervisor and the UGL Environment Manager. Corrective actions should be administered by the UGL Site Supervisor. Where a non-compliance with controls listed in **Table 3-1** is identified, corrective action must be implemented immediately.

2.5 Record Keeping

UGL are the current operators of the CRN and shall keep records of the inductions, monitoring and inspections (as required in **Section 4**), corrective actions and reports prepared for the Site. If the CRN operator changes, the responsibility should be transferred to the new contractor responsible for the CRN operations. These records should be evaluated and used for completing the review of this IEMP.

3. MANAGEMENT ACTIVITIES

3.1 Hazard Identification

Soils, internal dust, and paint onsite contain concentrations of heavy metals which exceed the adopted human health criteria and subsequently have the potential to harm human health. The distribution of contamination is defined by exceedances of adopted assessment criteria presented on **Figure 1 and 2, Appendix 1** and identify the presence of elevated lead, zinc and copper in shallow soils across the site and elevated lead throughout building interiors.

Lead is known to cause health effects in humans, especially children and developing foetuses. SafeWork NSW recognises that females with childbearing capacity are the most sensitive receptor at work sites.

Migration of metals into the environment, soils, groundwater and surface water, may cause environmental harm.

The primary routes of exposure relevant to human health are through ingestion following direct contact or inhalation of soil, dust and paint. Primary routes of exposure leading to ecological uptake in the receiving environment are from dust generation and the transport of soils or dissolved contaminants with surface and groundwater. Activities causing soil disturbance and dust generation at the site can exacerbate the movement of contaminated soils.

3.2 Management Strategy

Section 17 of the WHS Act requires risks to health and safety be eliminated so far as is reasonably practicable. The SafeWork Australia code of practice how to manage work health and safety risks (SafeWork, 2018) provides a hierarchy of control measures. This includes (most preferred to least preferred) eliminate hazard, substitution, isolation and implementing engineering controls. SafeWork NSW (2019) also advocates elimination of the hazard as the most preferred method of control.

The site management strategy is to isolate the contaminant and implement engineering controls until such time as hazard elimination through site remediation can be completed or a permanent management solution implemented.

This strategy is considered appropriate for mitigating potential impacts to both human health and the environment. As the mode of exposure is increased with disturbance of soils, dust and paint, measures are also aimed at minimising dust generation and surface water runoff from site.

Hazard mitigation measures are presented below to inform preparation of WHS plans specific to proposed scopes of work.

3.3 Hazard Mitigation

The principal hazard mitigation measure is to restrict access to the contaminated area by creating an exclusion zone until such time as the area is remediated and risks are documented to be acceptable. Existing fencing around the site should be inspected to ensure site security and limit access. Where access is required, strict management controls are to be implemented.

Hazard mitigation measures are provided in **Table 3-1** however specific controls are to be established by UGL to address scope specific risks as these work scopes are understood. These specific controls are to include the hazard mitigation measures outlined below as a minimum requirement.

Table 3-1: General Hazard Mitigation Measures

Category	General Requirements
Exclusion	
Exclusion Zones	<p>Prohibit use of site for residential purposes or any other purpose except for specific works undertaking periodic inspection and above ground maintenance.</p> <p>The site should only be accessed by persons inducted to this IEMP or by utility managers working under an EMP developed specifically for the works they are undertaking. Where utility managers are working under a separate EMP, the EMP should be reviewed against and align with this IEMP. The exclusion zone should be maintained including signage that reads:</p> <p style="text-align: center;">DANGER DO NOT ENTER Induction to Environmental Management Plan required.</p> <p>Contact the CRN – South Superintendent or Facilities Manager for further information via the CRN UGLRL Hotline: 1300 661 390 (a map will be presented defining the exclusion zone)</p>
Works that do not require soil disturbance or dust generation (including grounds maintenance if this can be completed without generating dust)	
Elimination	Eating, drinking or smoking on site is strictly prohibited.
Engineered controls	Groundcover by maintaining existing vegetation and pre-existing paved surfaces to prevent dust generation on-site. Where there is no groundcover, implement erosion controls to control dust generation.
Administrative controls for onsite workers / contractors	<p>Induction to this IEMP.</p> <p>Vehicles taken to site shall not contain baby equipment, child car seats etc and should be kept free of other personal items to the extent practical. Preferentially, vehicles should be left in the adjacent carpark</p>
PPE	<p>Standard rail corridor access PPE requirements, including:</p> <ul style="list-style-type: none"> • Long sleeve high visibility fluorescent orange shirt with reflective strips ('X' on back). • Long pants. • Steel capped safety boots. • Hard hat.
Facilities	Where works are required onsite toilet facilities and wash up areas for decontamination are to be provided. Workers are required to wash hands and face thoroughly before leaving site. Eating, drinking or smoking should not occur onsite.
Works that require soil disturbance	
	<p>Any soil disturbance works will be completed by an appropriately qualified and experienced contractor under their WHS plan that will be reviewed by the Environment Manager.</p> <p>Soil disturbance works shall be prohibited unless workers are inducted to a contractor WHS plan specific to the proposed scope.</p>

3.4 Communications and Notifications

The following stakeholders are identified and should be notified of site contamination and controls defined here-in:

- UGL rail/maintenance workers.
- UGL contractors.
- The NSW EPA.

Notification shall include provision of a copy of this IEMP.

The IEMP shall be appended to the Section 10.7 planning certificate until a LTEMP is put in place or the site is remediated.

4. SUMMARY MONITORING AND VERIFICATION REQUIREMENTS

Monitoring is required until a permanent remediation solution is identified. A summary of the monitoring requirements is outlined in **Table 4-1**.

Table 4-1: Summary of interim monitoring requirements

Element	Frequency	Reference
Monitoring to ensure fencing is substantially intact and signage remains clear	Quarterly	Section 3.3
Monitoring to ensure >80% groundcover is maintained	Quarterly	Section 3.3
Monitoring to limit unauthorised access	Quarterly	Section 3.3

Monitoring to ensure that the controls described within this plan are maintained will include completion of the checklist presented as **Appendix 2**. Monitoring records will be distributed to UGL and stored in the UGL management system for the CRN.

5. LIMITATIONS

Ramboll Australia Pty Ltd (Ramboll) prepared this report in accordance with the scope of work as outlined in our proposal to UGL Regional Linx dated 5 December 2022 and in accordance with our understanding and interpretation of current regulatory standards. It has been issued in confidence to UGL Regional Linx though reliance is extended to Transport for NSW and the Transport Asset Holding Entity, for the purposes of informing management of risks to rail/maintenance workers and members of the public associated with contamination at 106 Goulburn Street Tarago NSW. It should not be used for any other purpose.

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APPENDIX 1 FIGURES

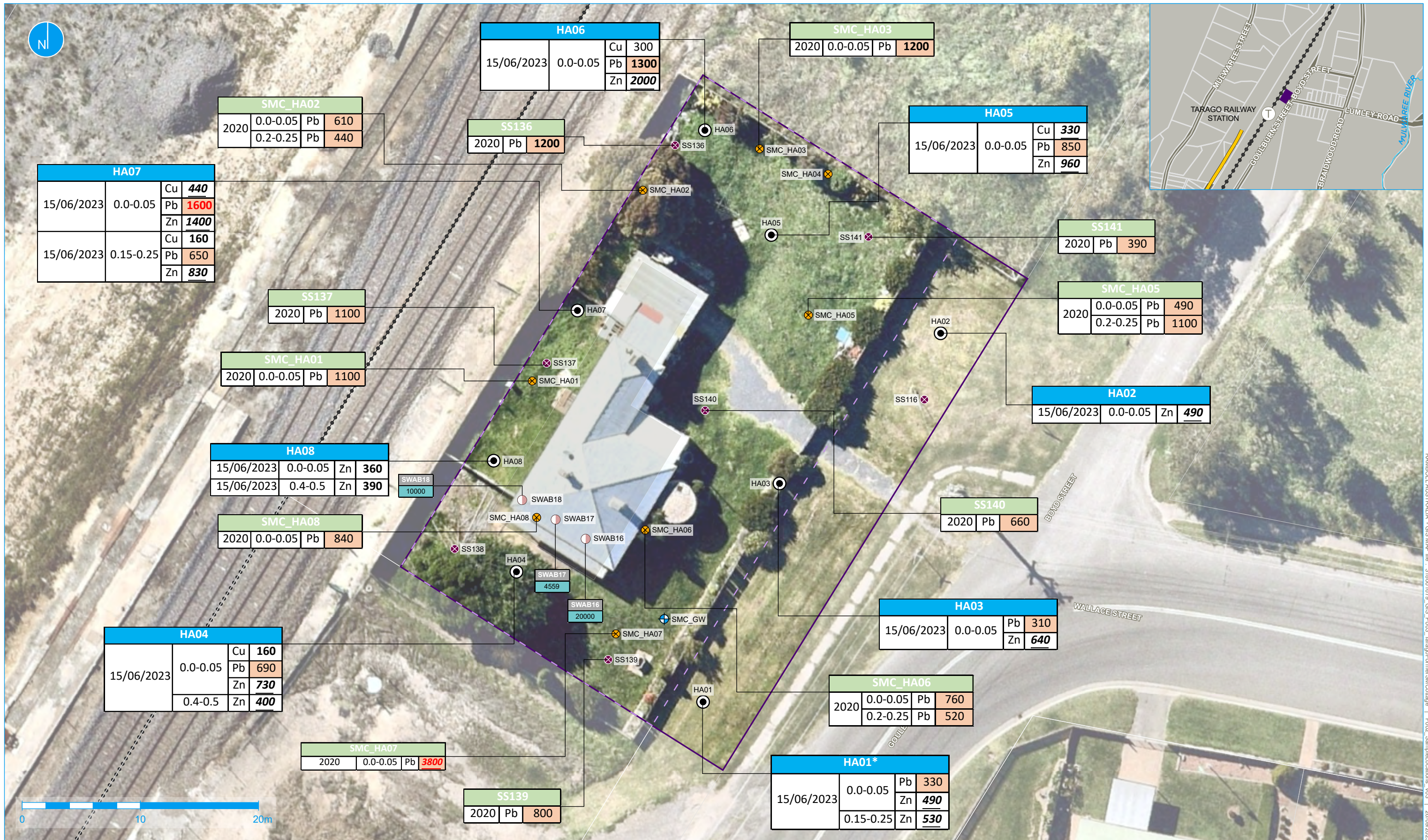


- Legend**
- Property boundary
 - Site fence
 - Previous sample locations
 - Tank water sample
 - Dust sample
 - Paint sample

Lead exceedance criteria

Soil Depth (m) >300 (mg/kg)	Rainwater tank sediment >300 (mg/kg)	Paint >0.1%
Rainwater tank water >0.01 (mg/L)	Dust interior Floors >108 (µg/m ²) Window Sills / >1076 (µg/m ²)	

Note - Sample locations from 2019/2020 are approximate only and adjusted to imagery available at the time.



- Legend**
- Property boundary
 - Site fence
 - Hand auger sample location (June 2023)
Sample name prefix "SMCDSI_"

- Previous sample locations**
- Dust sample
 - Groundwater sample
 - Hand auger sample
 - Shallow soil sample

Lead exceedance criteria

Dust Exterior	>4300 (µg/m ²)
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EIL criteria are based on aged SS-EIL values

Samples collected during the 2020 investigation
Samples collected during the 2023 investigation

Exceedance criteria for soil

Date	Depth (m)	Analyte	NEPM - HIL A RESIDENTIAL	NEPM - HIL D COMM/INDUSTRIAL	NEPM - EIL RESIDENTIAL	NEPM - EIL COMM/INDUST
		Copper - filtered (Cu)	6000 mg/kg	240,000 mg/kg	110 mg/kg	160 mg/kg
		Lead - filtered (Pb)	300 mg/kg	1,500 mg/kg	1,100 mg/kg	1,800 mg/kg
		Zinc - filtered (Zn)	7400 mg/kg	400,000 mg/kg	250 mg/kg	370 mg/kg

*Following QA/QC assessment, the highest concentration (from the primary sample) has been adopted for the purposes of characterization.
Note - Sample locations from 2019/2020 are approximate only and adjusted to imagery available at the time.

RAMBOLL Figure 2 : External building and soil samples and exceedances

APPENDIX 2 MONITORING CHECKLIST

