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L010 (Interim Audit Advice (0503-2303-10) Tarago Lead Management Action Plan) Rev 10

9 December 2024

Belinda Olteanu

Project Officer – Contaminated Lands, Regional Property & Asset Renewal / Network & Assets

Transport for NSW

Via email: Belinda.Olteanu@transport.nsw.gov.au

L010 Interim Audit Advice (0503-2303-10) – Tarago Woodlawn Siding, NSW – Review of Lead Management Action Plan

Dear Belinda,

1. Introduction and Background

Andrew Lau of JBS&G Australia Pty Ltd (JBS&G), has been engaged by Transport for New South Wales (TfNSW, the client) to conduct a site audit(s) on a portion of the Goulburn – Bombala Country Regional Network (CRN) rail corridor in Tarago NSW identified as part Lot 22 in Deposited Plan (DP) 1202608 (herein referred to as 'the site').

On 25 March 2020, the rail corridor was declared under section 60 of the Contaminated Land Management Act 1997 (CLM Act 1997) to be significantly contaminated land by the NSW EPA (Declaration Number 20201103; Area Number 3455) with the contaminating substance identified as lead. Reasons for the declaration provided by the EPA are as follows:

- "lead concentrations in soil within the rail corridor (Lot 22 DP1202608) exceed national guideline values for the protection of human health and the environment;
- lead contamination has impacted adjacent land at 106 Goulburn Street, Tarago (Lot 1 DP816626), with soil also found to contain lead at concentrations exceeding national guideline values for the protection of human health and the environment;
- there are complete exposure pathways to lead for occupants of 106 Goulburn Street, as well as potentially complete exposure pathways for persons working within the rail corridor; and
- there are potentially complete exposure pathways for onsite and offsite ecological receptors."

In response to the declaration, TfNSW have entered into a Voluntary Management Proposal (VMP) (Notice Number 20201711) with the EPA. A requirement of the VMP is the appointment of a NSW EPA accredited auditor. Andrew Lau is a Site Auditor accredited by the NSW Environment Protection Authority (EPA) under the CLM Act 1997 (Accreditation Number 0503).

The objective of this interim advice is to provide an auditor review of the appropriateness of the LMAP for the Tarago Rail Corridor.

2. Report Reviewed

The following document was reviewed in preparation of this Interim Audit Advice (IAA):

- *Tarago Lead Management Action Plan (LMAP)*, Tarago Rail Corridor. Revision 10, 12/11/2024, Ramboll Australia Pty Ltd (Ramboll 2024).

3. Summary of Lead Management Action Plan

The LMAP (Ramboll 2024) was prepared to address the potential risks from exposure to lead from the site due to the presence of lead containing ore. Specifically:

- Measures to prevent further offsite migration of lead impact via surface water or air;
- Measures to prevent members of the public accessing the site; and
- Controls for rail workers required to access the site.

It is noted that the plan does not address other lead sources that may be present on site or in the community, such as lead paint.

The Lead Management Action Plan detailed a number of controls as summarised below:

- A detailed list of the roles and responsibilities in regards to maintenance of controls and awareness of the Plan and its required measures;
- The legislative and regulatory framework applicable to the site as well as the required periodic reviews, corrective actions and record keeping;
- Interim management measures including surface sealants, sediment controls and verification monitoring of both surface water and air; and
- Mitigation of onsite risks including remediation and reduced disturbance of soils and dust generation whenever possible.

4. Auditor's Opinion

Subject to the limitations in **Attachment 1**, the auditor considers that the LMAP is suitably comprehensive for its stated purpose, namely to address management of lead impacts at the site prior to completion of remediation. Further to this, the Auditor considers that:

- The proposed means of mitigation of the lead impacts from leaving the site, are appropriate;
- The delegation of responsibilities are clearly defined; and
- The required contingencies and or review prompts are appropriate.

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.

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email alau@jbsg.com.au.

Yours sincerely:

A handwritten signature in black ink, appearing to read "Andrew Lau", with a stylized flourish at the end.

Andrew Lau
NSW EPA Accredited Site 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 s.47 (1) of the *Contaminated Land Management Act 1997*. 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.