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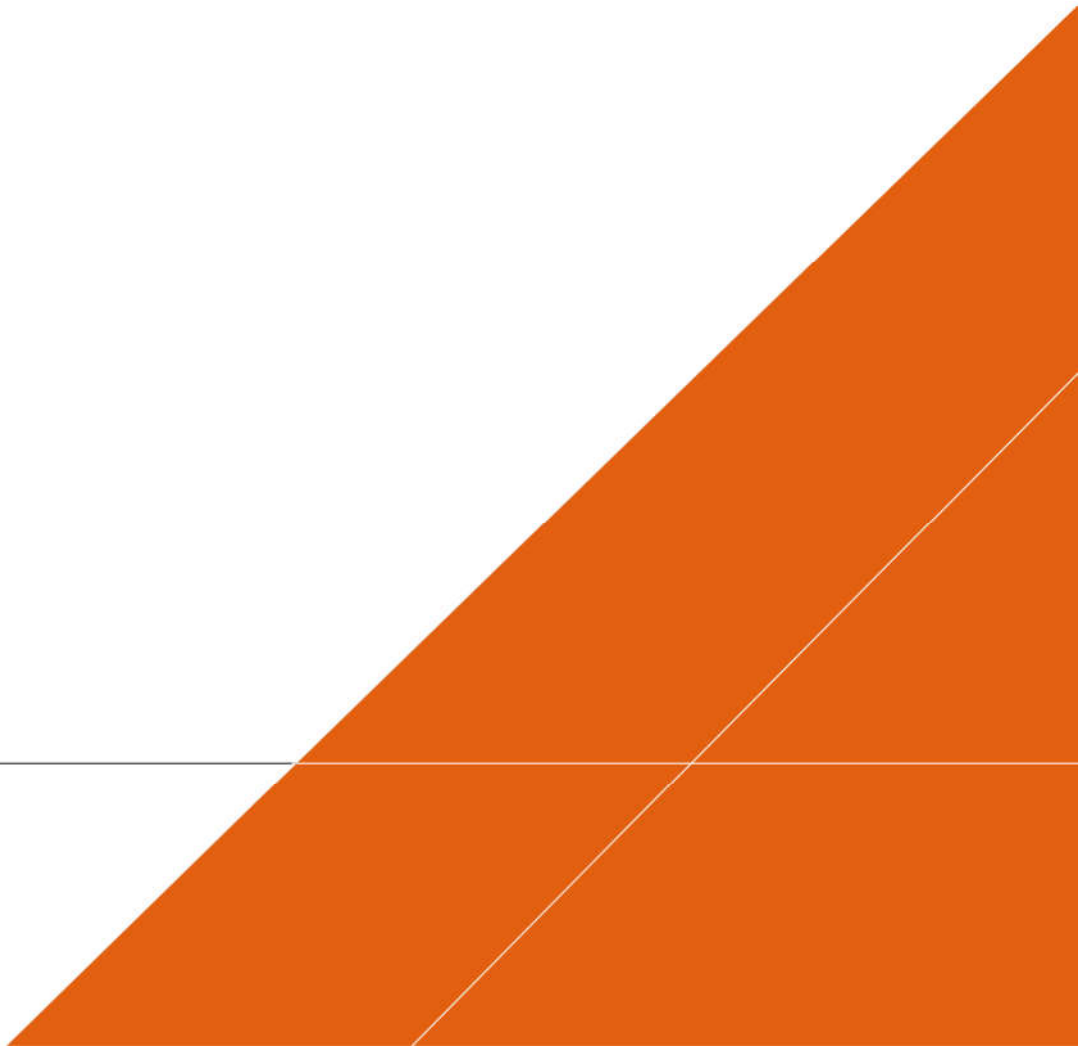
MOOREBANK PRECINCT WEST

6-Monthly Compliance Report

March 2018 – August 2018

12 NOVEMBER 2018



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CONTACT

T
M
E

Arcadis
Level 16/580 George Street,
Sydney | NSW 2000

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TACTICAL GROUP
MOOREBANK PRECINCT WEST

6-Monthly Compliance Report

March 2018 to August 2018

Author _____

Checker _____

Approver _____

Report No	LPWR-ARC-ENV-00002-6-monthly
Date	12/11/2018
Revision Text	002

This report has been prepared for Tactical Group in accordance with the terms and conditions of appointment for Moorebank Precinct West Early Works dated 7 October 2016. Arcadis Australia Pacific Pty Limited (ABN 76 104 485 289) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

REVISIONS

Revision	Date	Description	Prepared by	Approved by
001	26/10/2018	Draft for client review		
002	12/11/2018	Final addressing client's comments		

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ACRONYMS

Acronym	Meaning
CEMP	Construction Environmental Management Plan
CFFMP	Construction Flora and Fauna Management Plan
CoC	Conditions of Consent
CSWMP	Construction Soil and Water Management Plan
CTP	Compliance Tracking Programme
DP&E	Department of Planning and Environment
EEC	Ecologically Endangered Community
EPBC	Environmental Protection and Biodiversity Act 1999
ER	Environmental Representative
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
NOHSC	National Occupational Health and Safety Commission
PFAS	Polyfluoroalkyl Substances
REMMs	Revised Environmental Mitigation Measures
SIMTA	Sydney Intermodal Terminal Alliance
SSD	State Significant Development

1 INTRODUCTION

1.1 Precinct Overview

The Sydney Intermodal Terminal Alliance (SIMTA) and Moorebank Intermodal Company have entered into an agreement to develop the Moorebank Precinct East (MPE) Project and Moorebank Precinct West (MPW) Project into the Moorebank Intermodal Precinct (the Moorebank Precinct).

When completed, the Moorebank Precinct will move 1.5 million shipping containers annually by rail instead of road. It will also feature Australia's largest purpose-built warehouse and distribution precinct serviced by the latest automated technology which will see driverless shuttle carriers collect and transport containers around the precinct to be processed, unpacked and stored on site or distributed in smaller consignments.

Contractors have been appointed to undertake three packages of works under the current approvals across both the MPW and MPE Projects. Figure 1-1 describes the approvals and the relevant contractors appointed under each.

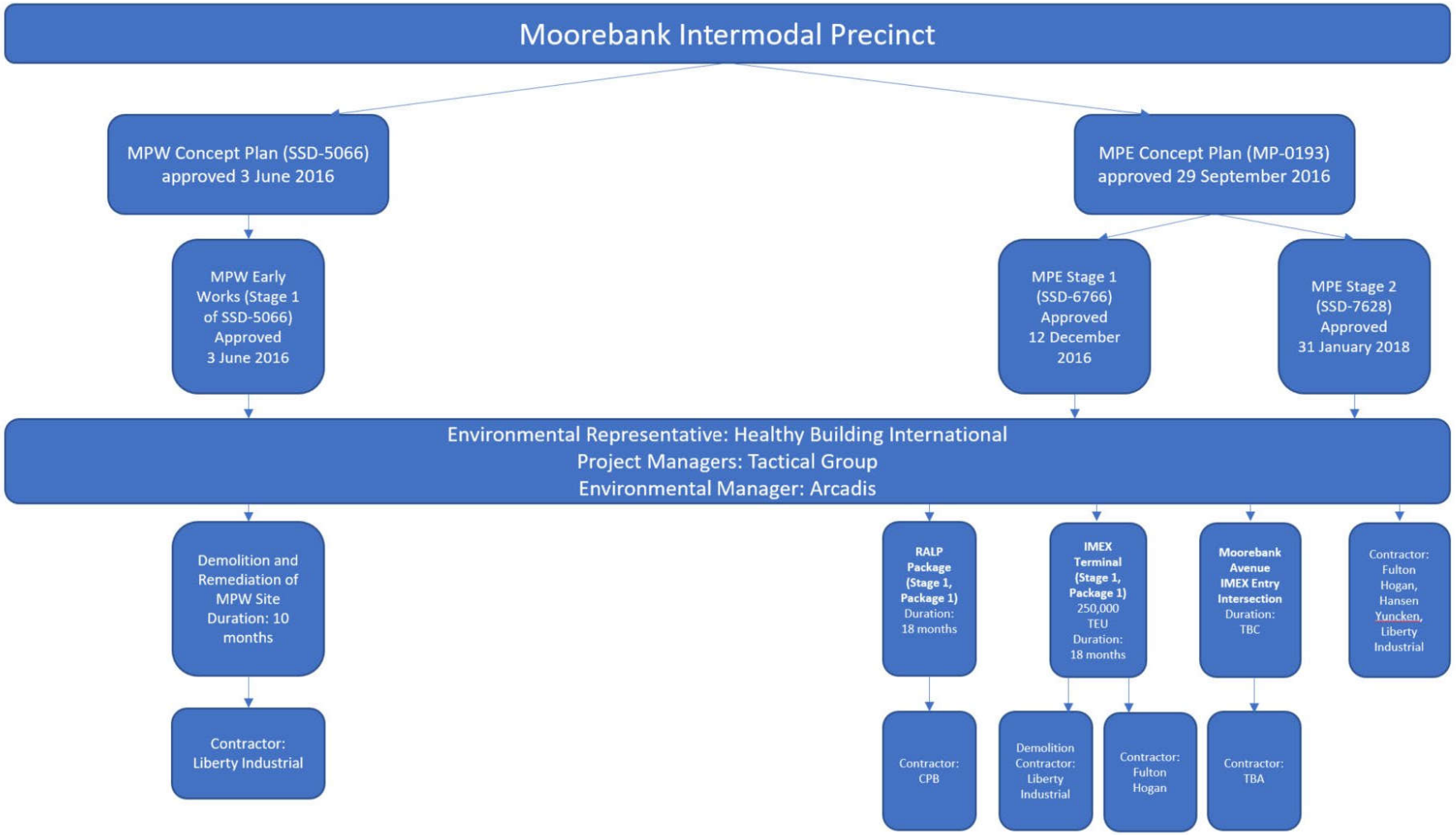

Figure 1-1 Overview of Moorebank Precinct Contract Structure

Liberty Industrial are undertaking the MPW Early Works, under the MPW Concept Approval, granted on 3 June 2016 (State Significant Development (SSD) 5066), i.e. the subject of this report.

The MPW Project will be delivered under the following existing concept plan and staged approvals:

- Development Consent (SSD-5066) granted by the PAC on 3 June 2016 for the 'Concept Plan Approval' of the MPW Project and Stage 1 Early Works under Part 4, Division 4.1 (now Division 4.7 as of 1 March 2018) of the EP&A Act
- *Environmental Protection and Biodiversity Act 1999* (EPBC) Approval (No. 2014/7152) granted in May 2014 for the demobilisation of the Department of Def\ence from the Commonwealth land known formerly as Lot 3001
- EPBC Approval (No. 2011/6086) approved on 27 September 2016 for the impact of the MPW Project on listed threatened species and communities (sections 18 and 18A of the EPBC Act) and Commonwealth land (sections 26 and 27A of the EPBC Act)
- Planning Proposal for the rezoning of the MPW site which was gazetted on 24 June 2016 for an amendment to the Liverpool Local Environmental Plan 2008.

The other approved works to be undertaken within the Moorebank Precinct, namely under the MPE Stage 1 Approval (SSD 6766) and MPE Stage 2 (SSD 7628), will be undertaken as part of separate approvals and a separate construction program, and are not the subject of this report.

1.2 Scope and Purpose

The purpose of this 6-Monthly Compliance Report is to satisfy CoA A2(c)(ii) (see Table 1-1) of the MPW Early Works planning approval (Stage 1 of the MPW Project (SSD 5066)) and to provide to the Department of Planning and Environment (DP&E) a report outlining the status of compliance with the Conditions of Consent (CoC) and Revised Environmental Mitigation Measures (REMMs). This report covers the period between March 2018 and August 2018.

Table 1-1 Requirements for Compliance Reporting (SSD 5066).

CoC No.	Condition	Reference
A2	The Applicant shall prepare and implement a Compliance Tracking Programme (CTP), to track compliance with the requirements of this approval. The Program shall be submitted to the Secretary for approval prior to the commencement of construction and operate for the duration of construction. The Program shall include, but not be limited to:	The CTP has been prepared to satisfy this condition. The CTP was approved by the Secretary on 21 February 2017 prior to the commencement of Early Works.
(c)	provision for periodic reporting of compliance status to the Secretary, including but not limited to: ii. Six-monthly, or other timing as agreed by the Secretary, Construction Compliance Reports, for the duration of construction	This 6-monthly compliance report has been prepared to satisfy this condition and provides a description of the compliance status of the Project for the period from March 2018 to August 2018, and will be provided to the Secretary for information.

1.3 Periodic Review

This compliance report has been prepared in accordance with the CTP requirements with inputs by Arcadis, Liberty Industrial and SIMTA. The CTP was approved by the Secretary on 21 February 2017.

Regular compliance activities, such as progress meetings, inspections, client surveillance and monitoring have been undertaken in accordance with the Construction Environment Management Plan (CEMP) Section 9 and the aspect-specific sub-plans. Environmental controls are inspected regularly to ensure their ongoing suitability and effectiveness as detailed in Section 3 of this report.

2 PROJECT DESCRIPTION

2.1 Site Location and Environmental Constraints

The Moorebank Precinct West (MPW) site is located in the Liverpool Local Government Area in Sydney's South West Sub-Region, approximately 4 km south of the Liverpool city centre. The MPW Site is approximately 30 km south-west of the Sydney Central Business District and approximately 26 km west of Port Botany.

The MPW site is generally bounded by the Georges River to the west, Moorebank Avenue to the east, the East Hills Railway Line to the south and the M5 Motorway to the north. It is located on Moorebank Avenue, Moorebank and forms Lot 1 in Deposited Plan 1197707[1], which is wholly owned by the Commonwealth, and leased by SIMTA. The site also contains Lots 100 and 101 DP1049508, which are located north of Bapaume Road.

The MPW Early Works footprint (i.e. area of impact) is located within the MPW site as shown in

Figure 2-1. The MPW Early Works footprint is predominately located in the central part of the MPW site, however also includes areas of the northern and southern parts of the MPW site.

The MPW Early Works footprint and surrounds include a number of existing environmental constraints, which have been considered as part of the mitigation measures provided within the environmental approvals documentation for the MPW Project. Figure 2-2 shows the extent of the MPW Early Works footprint and key environmental constraints within and outside of the area.

[1] Previously legally described as "Lot 3001, DP 1125930" in the Concept Plan Approval (MP 10_0193), however has since been subdivided.

LEGEND

Moorebank Precinct West (MPW)
MPW site boundary
MPW Stage 1 (Early Works)
Existing railway
Watercourse

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 16, 580 George St | Sydney NSW 2000
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Coordinate System: GDA 1994 MGA Zone 56
Aerial imagery supplied by nearmap (Sept, 2018)

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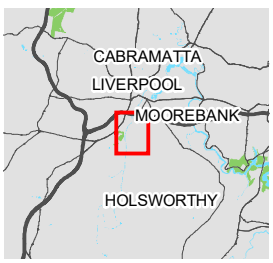
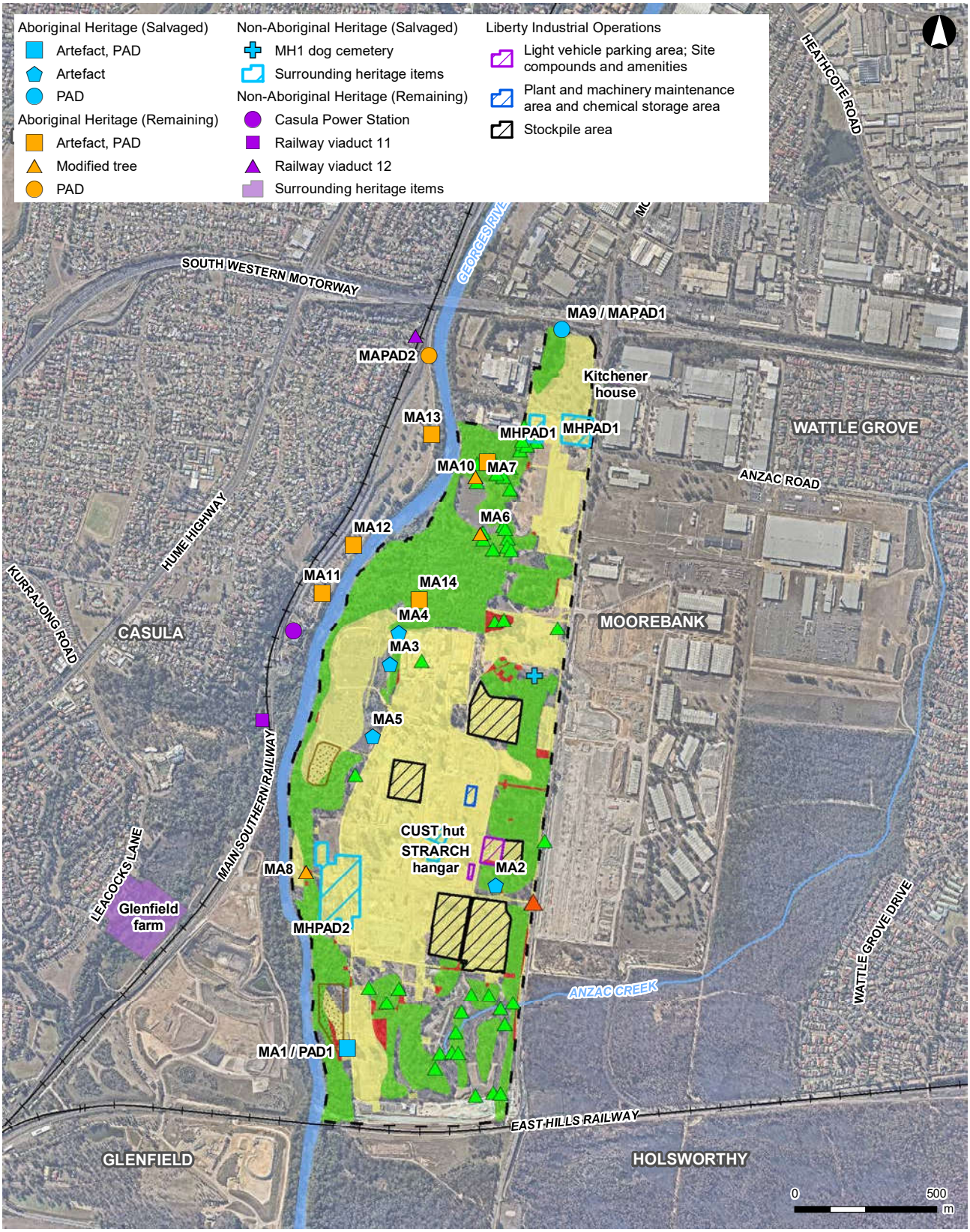


Figure 2-1: The extent of the MPW Early Works footprint



LEGEND

- MPW site boundary
- Site entry and exit
- Hollow bearing tree
- Existing railway
- Watercourse
- Known PFAS Contamination: Exclusion Zone
- Vegetation exclusion area
- Approximate Early Works footprint boundary
- Approximate Early Works (only to occur if no impact to EEC)

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 16, 580 George St | Sydney NSW 2000
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

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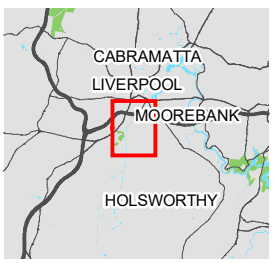

Figure 2-2 Early Works Footprint and Environmental Constraints

2.2 Scope of Works

Liberty Industrial have been appointed to undertake the MPW Early Works Project which is also referred to as Land Preparation Works – Demolition and Remediation in construction documentation. Early Works is defined in the CoC (Development) as:

"the demolition of buildings, including services termination and diversion; rehabilitation of the excavation/ earthmoving training area; remediation of contaminated land; removal of underground storage tanks; heritage impact remediation works; and the establishment of construction facilities and access, including site security."

Based on this approval and the associated approvals documentation, the complete scope of works included within the MPW Early Works Project is as follows:

- The demolition of existing buildings and structures
- Service utility terminations and diversion/relocation
- Removal of existing hardstand/roads/pavements and infrastructure associated with existing buildings
- Rehabilitation of the excavation/earthmoving training area (i.e. 'dust bowl')
- Remediation of contaminated land and hotspots, including areas known to contain asbestos, and the removal of:
  - Underground storage tanks
  - Unexploded ordnance and explosive ordnance waste if found
  - Asbestos contaminated buildings
- Archaeological salvage of Indigenous and European sites
- Establishment of a conservation area along the Georges River
- Establishment of construction facilities (which may include a construction laydown area, site offices, hygiene units, kitchen facilities, wheel wash and staff parking) and access, including site security
- Vegetation removal, including the relocation of hollow-bearing trees, as required for remediation/demolition purposes.

The MPW Concept Development Consent (Definitions), provides the following definition for construction:

"Construction includes all work in respect of the SSD other than:

- *Survey; acquisitions; or building/ road dilapidation surveys; fencing; investigative drilling, excavation or salvage; and work undertaken in accordance with a strategy or salvage operation required by the conditions of this approval; or minor clearing or translocation of native vegetation that does not comprise any EECs (Endangered Ecological Communities).*
- *Establishment of site compounds and construction facilities*
- *Installation of environmental mitigation measures*
- *Utilities adjustment and relocation that do not present a significant risk to the environment, as determined by the Environmental Representative*
- *Other activities determined by the Environmental Representative to have minimal environmental impact."*

Based on the above definition of construction, 'pre-construction works' have been defined as follows:

- Repair of perimeter fencing
- Bushfire protection works (including any necessary minor vegetation clearing outside EEC areas, no clearing permitted in EEC areas)
- EEC and heritage protection fencing/bunting and signage
- Establishment of site compounds. Mobilisation to site to the extent required to undertake pre-construction works
- Soft strip of building interiors and waste management including removal of furniture, cabling, fluorescent light tubes, PCB capacitors, and asbestos and degassing of air conditioning units. Heritage buildings only to be soft stripped once archival recording has been completed
- Servicing potholing/locating, disconnection, capping and relocation of all services
- Establishment of environmental controls
- Building hazardous material assessments and asbestos removal
- Management of unexpected heritage and contamination finds

The risks and mitigation measures associated with the construction activities are managed in accordance with the DP&E approved CEMP.

2.3 Works Undertaken – March 2018 to August 2018

The physical works that have been undertaken during this reporting period are outlined below:

- Demolition and removal of 247 buildings and 119,167 m^2 of hardstand, with 3205 tonnes of steel sent offsite for recycling
- Demolition and salvage of Chatham Avenue Gate 35 Guardhouse
- Backfilling excavations
- Unexpected finds removal
- Remediation works of contaminated soils containing asbestos and Polyfluoroalkyl Substances (PFAS)
- Construction of long-term sediment erosion control works including sediment basins and catch drains
- Weed control of priority weeds to assist establishment of native understorey
- Underground storage tank removal
- Chatham Avenue entry road completion
- Heritage investigations on Lot 100.

3 PROJECT COMPLIANCE

3.1 Inspections

3.1.1 Internal Inspections

Internal inspections are undertaken by Liberty Industrial's Environmental Advisor on a regular basis. These are interspersed by inspections undertaken by the Environmental Representative (ER) as detailed in Section 3.1.2.

Internal inspections found no significant non-compliance issues. However, it was noted that the south-eastern part of the site needed additional polymer for dust suppression. It was also noted that PFAS contamination is still under investigation. The results of these contamination investigations may require additional remedial works.

3.1.2 Environmental Representative Inspections

The ER undertook six inspections generally on a monthly basis. Quarterly reports were submitted to DP&E by the ER in March 2018 and August 2018 within 7 days of the end of the reporting period, as per CoC D2. The dates on which these inspections took place are listed below:

- 15/03/18
- 06/04/18
- 18/05/18
- 15/06/18
- 13/07/18
- 31/08/18

3.2 Other Regulator Inspections

The DP&E completed inspections of the site on 27 March 2018, 16 May 2018 and 31 May 2018. Upon completion it was noted that there were no non-compliance issues.

3.3 Audits Undertaken

No external audits were undertaken during this reporting period.

3.4 Monitoring

3.4.1 Asbestos Air Monitoring

Asbestos air monitoring has been undertaken daily during asbestos remediation works throughout this reporting period. Monitoring is undertaken and reported by JBS&G in accordance with the *National Occupational Health and Safety Commission (NOHSC) Guidance Note on the Membrane Filter Method for the Estimating Airborne Asbestos Fibre, 2nd Edition (NOHSC 2005b).*

This monitoring commenced on 16 March 2017. All results have been below detectable limit of 0.01 fibres/ml of air at boundaries of asbestos removal work areas.

3.4.2 Surface Water Monitoring

There are two water monitoring locations, one downstream and one upstream of the site, which are visually monitored to determine if works onsite are causing increased turbidly or if any visible oil or grease is present at either location. If works are

suspected of causing impacts on the Georges River, this will be investigated and managed in accordance with the Construction Soil and Water Management Plan (CSWMP) and the CEMP.

3.4.3 Discharge Water Monitoring

If water is required to be discharged from sediment basins, testing of parameters such as pH, turbidity and visual inspection for oils and grease is undertaken. In accordance with the requirements of the CSWMP.

No discharge of water was undertaken during this reporting period.

3.5 Environmental Incidents

Five environmental incidents occurred during the reporting period and are outlined in Table 3-1.

As defined in the MPW Early Works EMP Section 10, three incidents were rated Level 3 (moderate severity), one was rated Level 2 (minor severity) and one rated Level 1 (low severity.

Table 3-1 Summary of Environmental Incidents

Date	Incident Description	Immediate Action	Cause	Corrective Actions
29/03/2018	Hydraulic hose leak from moxy truck (Level 3).	Spill kit deployed to contain the leak.	Unexpected hydraulic hose fault.	Maintenance worker on site repairing leak within an hour of notification. Site has been cleaned and rectified by Tom Anderson (Liberty Industrial)
05/04/2018	Nest box inspections not undertaken at the required frequency (Level 3).	Amendment of the weekly inspection pro-forma to ensure weekly inspections are recorded.	Oversight by site project team.	Continue to follow the process outlined in the CFFMP and Nest Box Plan.
14/04/2018	Bushfire across Moorebank site. Smaller spot fires flared up in subsequent days (Level 1).	NSW Fire Brigade called to attend to emergency. Security guard called to site to secure site access cut open by NSW Fire Brigade.	High temperatures and high winds.	Situation monitored in conjunction with emergency services.
03/05/2018	Illegal dumping of material outside Moorebank site boundary (Level 2).	JBS&G tested relevant stockpiles for contamination.	Oversight by site project team.	Material deemed to be uncontaminated and left in situ.
12/07/2018	Water cart leaking oil onto hard stand in lay down yard (Level 3).	Spill kit dispatched to the area to clean up the spill.	Unexpected fault in water cart.	Water cart repaired.