

2 June 2023

The Planning Secretary
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Planning Secretary,

SSD-9912 Roseville College Sport and Wellbeing Centre
Response to Independent Environmental Audit Report #2

We write on behalf of the Anglican Schools Corporation with regards to its development at 27-29 and 37 Bancroft Avenue, Roseville, Application Number SSD-9912.

Please find enclosed the second Independent Environmental Audit Report (the 'Audit'), dated 23 May 2022.

We note that the Audit found 3 non-compliances. Section 4 of the Audit sets out Recommendations and Opportunities for Improvement.

Attached at **Appendix A** is our response to the auditor's findings and recommendations.

A copy of the report and this letter of response will be uploaded to the project website in due course in accordance with condition A39 (c).

Yours sincerely,
EPM Projects



Jordan Graham
Associate



APPENDIX A – Proponent Response to Audit Findings

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
Non-compliances					
A32	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	This item is considered noncompliant as the out-of-hours work has not been notified to DPE and the Certifier.	It is recommended that similar out-of-hours occurrence is notified to DPE and Certifier as a non-compliance	Agreed and noted.	N/A
A33	The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	This item is considered noncompliant as the out-of-hours work has not been notified to DPE and Certifier with the details requested in Condition A33 of the SSD 9912.	It is recommended that similar out of hours occurrence is notified to DPE and Certifier as a non-compliance in accordance with the requirements of this condition.	Agreed and noted.	N/A
C4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive	This item is considered non-compliant due to out-of-hours work on 15 November 2022 was triggered by the concrete pouring work delay. It is also noted that contractors commenced work just before 7am on 16 November and 17 December 2022.	- Taylor should consider reinforcing approved work hours to all workers. - Taylor should aim to obtain out of hours work permit on planned out of hours work. - Similar out of hours occurrence should be logged in as a non-compliance. - Taylor should notify DPE as soon as practicable when an unplanned out of hours work is anticipated during the day. Following the occurrence, DPE should be notified.	Agreed and noted.	N/A
Recommendations for Improvement					
A28	At least 48 hours before the commencement of construction until the completion of all works under this	It is noted from EPM and Taylor that the CEMP in the project website is the up-to-	To avoid confusion, it is advisable to upload the	Action to upload the updated sub-plans	9/06/23

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
	<p>consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <p>(i) the documents referred to in condition A2 of this consent;</p> <p>(ii) all current statutory approvals for the development;</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>(iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</p> <p>(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</p> <p>(vi) a summary of the current stage and progress of the development;</p> <p>(vii) contact details to enquire about the development or to make a complaint;</p> <p>(viii) a complaints register, updated monthly;</p> <p>(ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;</p> <p>(x) any other matter required by the Planning Secretary; and</p> <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.</p>	<p>date version.</p> <p>However, as of 2 May 2023, Geosyntec noted that the subplans attached to the CEMP (as Appendices) has a different date to the sub-plans provided as a stand alone link in the project website (e.g. the Construction Traffic and Pedestrian Management Sub-Plan).</p>	<p>CEMP with the most current appendices.</p>	<p>and appendices has been undertaken.</p>	
A30/A31	<p>The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident</p>	<p>The Auditor accepts that the incident on damage of the power pole does not present a significant risk of harm that requires notification to DPE, based on the evidence provided by Ausgrid.</p> <p>While no further evidence was provided on the sediment runoff, rectification has</p>	<p>It is recommended that future similar incident that has the potential to present significant risk of harm should be notified to DPE.</p>	<p>Agreed and noted.</p>	<p>N/A</p>

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
		been conducted onsite, and the basement excavation has been completed, which means that similar incident will be unlikely.			
A36	If necessary to either improve the environmental performance of the development, cater for a modification, or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review. Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	Refer to the recommendation.	Strategies, plans and programs under the development consent that are updated must be submitted to Planning Secretary or Certifier within the timeframe required in Item A36 of the consent condition.	Agreed and noted.	9/06/2023
A38	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements, unless otherwise agreed by the Planning Secretary.	Refer to the recommendation.	A copy of this IEA and EPM response must be submitted to DPE	Agreed and noted.	2/06/2023
A39	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	Refer to the recommendation.	A copy of this IEA and EPM response must be uploaded to the public website following completion of this IEA within 60 days after submitting it to DPE.	Agreed and noted.	2/06/2023
C20	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	The Auditor considers that the complaints on the dust migration to the neighbour's property have been adequately managed through moving the equipment to minimise impact to the neighbour. Additionally, the neighbour has accepted Taylor's offer to clean their property. It is noted that cleaning of the property is yet to be	The neighbour's property is cleaned following the last complaint.	This has been agreed with the neighbour and will be undertaken before the neighbour has their house painted.	TBC pending agreement of a convenient time with the neighbour

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
		conducted on the latest complaint.			
C23	The Applicant must: (a) ensure that only virgin excavated natural material (VENM), excavated natural material (ENM), or other material approved in writing by the EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifier upon request.	Refer to recommendation.	A complete laboratory report and supporting evidences should be obtained for all imported material prior to the material being brought onto the site. Recycled aggregate must be assessed for compliance with Recovered Aggregate Order 2014.	Taylor Construction has confirmed that their supplier of recycled products are complying with the EPA Recovered Aggregate Order 2014. Please refer to Appendix B.	N/A
Section 10.3.9	Chemicals, Oils and Other Contaminants - Prior to commencing work on site, an assessment of the quantities and locations of hazardous substances, chemicals, etc. likely to be held on site must be undertaken. - The location of hazardous substances and other contaminants must be marked on a site map (refer to appendix 5). - The Site Manager will use the assessment when planning the works to minimize the potential for pollution. This includes providing appropriate storage, separation of incompatible materials and bunding, and ensuring that all activities that use or handle these substances are undertaken in an area that will not cause water pollution or land contamination. - Spill kits will be provided wherever substances that could potentially cause pollution are stored and handled. - Relevant site personnel will be trained in spill response and will be familiar with the contents and function of the spill kit materials on site. - All spills, no matter how small, must be cleaned up immediately and be reported as an environmental incident. - Refuelling or maintenance of plant and equipment, or any other activity which may result in the spillage of a chemical, fuel or lubricant on the site, is not permitted without appropriate temporary controls measures. The use and storage of any hazardous substances or other chemicals will be made strictly in accordance with the	Refer to recommendation.	- Fuel containers should not be stored in unpaved areas outside the fuel cabinets.	Recommendations have been implemented.	N/A

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
	<p>manufacturer's instructions and the relevant materials safety data sheets (MSDS).</p> <p>Spill Response:</p> <ul style="list-style-type: none"> - Major spillages must be notified immediately, and all efforts made to contain the spill and prevent escape into storm water drains and waterways, provided it is safe to do so. - If the spill is beyond the capacity of the site personnel to contain and clean up, specialist services must be employed. - Minor spillages must be cleaned up immediately. - If soil or ground is contaminated, the soil is to be removed and placed into a bag or designated waste drum and disposed of appropriately. - If the spill enters drains or waterways, the incident may be required to be reported to the appropriate regulatory authority (local council) as soon as practicable, in accordance with the duty to report under the POEO Act. The decision to report must be discussed with the HSE Manager or a Director prior to making the report. 				
Section 4.3	<ul style="list-style-type: none"> - Major concrete pours and crane/plant erection and dismantle will only take place during school holiday periods where possible. - Fixed cranes, excavation plants as well as piling plants will enter the site after hours via Bancroft Avenue with appropriate traffic control. 	Refer to recommendation.	This item should be amended from the CTPMP to allow concrete pour outside school holiday	Agreed and is currently reviewed to have it changed.	30/6/23

APPENDIX B – Recycled Aggregate Compliance Documentation



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CERTIFICATE OF ANALYSIS 314660-A

Client Details

Client	Concrete Recyclers (Group) Pty Ltd
Attention	Scott Lawson
Address	PO Box 238, Rydalmere, NSW, 1701

Sample Details

Your Reference	<u>CAM & KUR</u>
Number of Samples	additional analysis
Date samples received	18/01/2023
Date completed instructions received	22/02/2023

Analysis Details

Please refer to the following pages for results, methodology summary and quality control data.

Samples were analysed as received from the client. Results relate specifically to the samples as received.

Results are reported on a dry weight basis for solids and on an as received basis for other matrices.

Report Details

Date results requested by 01/03/2023

Date of Issue 28/02/2023

NATA Accreditation Number 2901. This document shall not be reproduced except in full.

Accredited for compliance with ISO/IEC 17025 - Testing. **Tests not covered by NATA are denoted with ***

Results Approved By

Loren Bardwell, Development Chemist

Authorised By

Nancy Zhang, Laboratory Manager

Client Reference: CAM & KUR

Acid Extractable metals in soil						
Our Reference		314660-A-1	314660-A-2	314660-A-3	314660-A-4	314660-A-5
Your Reference	UNITS	CAM318	CAM320	CAM322	CAM324	CAM326
Date Sampled		04/10/2022	28/10/2022	16/11/2022	2/12/2022	21/12/2022
Type of sample		Brick	Brick	Brick	Brick	Brick
Date prepared	-	19/01/2023	19/01/2023	19/01/2023	19/01/2023	19/01/2023
Date analysed	-	20/01/2023	20/01/2023	20/01/2023	20/01/2023	20/01/2023
Arsenic	mg/kg	<4	<4	<4	<4	<4
Mercury	mg/kg	<0.1	<0.1	<0.1	<0.1	<0.1
Nickel	mg/kg	5	5	4	5	5

Acid Extractable metals in soil						
Our Reference		314660-A-6	314660-A-7	314660-A-8	314660-A-9	314660-A-10
Your Reference	UNITS	CAM319	CAM321	CAM323	CAM325	CAM327
Date Sampled		04/10/2022	28/10/2022	16/11/2022	2/12/2022	21/12/2022
Type of sample		Concrete	Concrete	Concrete	Concrete	Concrete
Date prepared	-	19/01/2023	19/01/2023	19/01/2023	19/01/2023	19/01/2023
Date analysed	-	20/01/2023	20/01/2023	20/01/2023	20/01/2023	20/01/2023
Arsenic	mg/kg	<4	<4	<4	<4	4
Mercury	mg/kg	<0.1	<0.1	<0.1	<0.1	<0.1
Nickel	mg/kg	9	11	10	8	10

Acid Extractable metals in soil						
Our Reference		314660-A-11	314660-A-12	314660-A-13	314660-A-14	314660-A-15
Your Reference	UNITS	KUR256	KUR258	KUR260	KUR262	KUR264
Date Sampled		04/10/2022	28/10/2022	16/11/2022	2/12/2022	21/12/2022
Type of sample		Brick	Brick	Brick	Brick	Brick
Date prepared	-	19/01/2023	19/01/2023	19/01/2023	19/01/2023	19/01/2023
Date analysed	-	20/01/2023	20/01/2023	20/01/2023	20/01/2023	20/01/2023
Arsenic	mg/kg	<4	<4	<4	<4	<4
Mercury	mg/kg	<0.1	<0.1	<0.1	<0.1	<0.1
Nickel	mg/kg	7	5	6	6	5

Acid Extractable metals in soil						
Our Reference		314660-A-16	314660-A-17	314660-A-18	314660-A-19	314660-A-20
Your Reference	UNITS	KUR257	KUR259	KUR261	KUR263	KUR265
Date Sampled		04/10/2022	28/10/2022	16/11/2022	2/12/2022	21/12/2022
Type of sample		Concrete	Concrete	Concrete	Concrete	Concrete
Date prepared	-	19/01/2023	19/01/2023	19/01/2023	19/01/2023	19/01/2023
Date analysed	-	20/01/2023	20/01/2023	20/01/2023	20/01/2023	20/01/2023
Arsenic	mg/kg	<4	<4	<4	<4	<4
Mercury	mg/kg	<0.1	<0.1	<0.1	<0.1	<0.1
Nickel	mg/kg	8	7	8	9	9

Acid Extractable metals in soil		
Our Reference		314660-A-21
Your Reference	UNITS	KUR256 - [TRIPLICATE]
Date Sampled		04/10/2022
Type of sample		Brick
Date prepared	-	19/01/2023
Date analysed	-	20/01/2023
Arsenic	mg/kg	<4
Mercury	mg/kg	<0.1
Nickel	mg/kg	5

Client Reference: CAM & KUR

Method ID	Methodology Summary
Metals-020	Determination of various metals by ICP-AES.
Metals-021	Determination of Mercury by Cold Vapour AAS.

Client Reference: CAM & KUR

QUALITY CONTROL: Acid Extractable metals in soil				Duplicate				Spike Recovery %		
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	LCS-1	314660-A-2
Date prepared	-			19/01/2023	1	19/01/2023	19/01/2023		19/01/2023	19/01/2023
Date analysed	-			20/01/2023	1	20/01/2023	20/01/2023		20/01/2023	20/01/2023
Arsenic	mg/kg	4	Metals-020	<4	1	<4	<4	0	106	110
Mercury	mg/kg	0.1	Metals-021	<0.1	1	<0.1	<0.1	0	112	119
Nickel	mg/kg	1	Metals-020	<1	1	5	5	0	107	98

QUALITY CONTROL: Acid Extractable metals in soil				Duplicate				Spike Recovery %		
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	[NT]	[NT]
Date prepared	-			[NT]	11	19/01/2023	19/01/2023		[NT]	[NT]
Date analysed	-			[NT]	11	20/01/2023	20/01/2023		[NT]	[NT]
Arsenic	mg/kg	4	Metals-020	[NT]	11	<4	<4	0	[NT]	[NT]
Mercury	mg/kg	0.1	Metals-021	[NT]	11	<0.1	<0.1	0	[NT]	[NT]
Nickel	mg/kg	1	Metals-020	[NT]	11	7	5	33	[NT]	[NT]

Result Definitions

NT	Not tested
NA	Test not required
INS	Insufficient sample for this test
PQL	Practical Quantitation Limit
<	Less than
>	Greater than
RPD	Relative Percent Difference
LCS	Laboratory Control Sample
NS	Not specified
NEPM	National Environmental Protection Measure
NR	Not Reported

Quality Control Definitions

Blank	This is the component of the analytical signal which is not derived from the sample but from reagents, glassware etc, can be determined by processing solvents and reagents in exactly the same manner as for samples.
Duplicate	This is the complete duplicate analysis of a sample from the process batch. If possible, the sample selected should be one where the analyte concentration is easily measurable.
Matrix Spike	A portion of the sample is spiked with a known concentration of target analyte. The purpose of the matrix spike is to monitor the performance of the analytical method used and to determine whether matrix interferences exist.
LCS (Laboratory Control Sample)	This comprises either a standard reference material or a control matrix (such as a blank sand or water) fortified with analytes representative of the analyte class. It is simply a check sample.
Surrogate Spike	Surrogates are known additions to each sample, blank, matrix spike and LCS in a batch, of compounds which are similar to the analyte of interest, however are not expected to be found in real samples.
Australian Drinking Water Guidelines recommend that Thermotolerant Coliform, Faecal Enterococci, & E.Coli levels are less than 1cfu/100mL. The recommended maximums are taken from "Australian Drinking Water Guidelines", published by NHMRC & ARMC 2011.	
The recommended maximums for analytes in urine are taken from "2018 TLVs and BEIs", as published by ACGIH (where available). Limit provided for Nickel is a precautionary guideline as per Position Paper prepared by AIOH Exposure Standards Committee, 2016.	
Guideline limits for Rinse Water Quality reported as per analytical requirements and specifications of AS 4187, Amdt 2 2019, Table 7.2	

Laboratory Acceptance Criteria

Duplicate sample and matrix spike recoveries may not be reported on smaller jobs, however, were analysed at a frequency to meet or exceed NEPM requirements. All samples are tested in batches of 20. The duplicate sample RPD and matrix spike recoveries for the batch were within the laboratory acceptance criteria.

Filters, swabs, wipes, tubes and badges will not have duplicate data as the whole sample is generally extracted during sample extraction.

Spikes for Physical and Aggregate Tests are not applicable.

For VOCs in water samples, three vials are required for duplicate or spike analysis.

Duplicates: >10xPQL - RPD acceptance criteria will vary depending on the analytes and the analytical techniques but is typically in the range 20%-50% – see ELN-P05 QA/QC tables for details; <10xPQL - RPD are higher as the results approach PQL and the estimated measurement uncertainty will statistically increase.

Matrix Spikes, LCS and Surrogate recoveries: Generally 70-130% for inorganics/metals (not SPOCAS); 60-140% for organics/SPOCAS (+/-50% surrogates) and 10-140% for labile SVOCs (including labile surrogates), ultra trace organics and speciated phenols is acceptable.

In circumstances where no duplicate and/or sample spike has been reported at 1 in 10 and/or 1 in 20 samples respectively, the sample volume submitted was insufficient in order to satisfy laboratory QA/QC protocols.

When samples are received where certain analytes are outside of recommended technical holding times (THTs), the analysis has proceeded. Where analytes are on the verge of breaching THTs, every effort will be made to analyse within the THT or as soon as practicable.

Where sampling dates are not provided, Envirolab are not in a position to comment on the validity of the analysis where recommended technical holding times may have been breached.

Where matrix spike recoveries fall below the lower limit of the acceptance criteria (e.g. for non-labile or standard Organics <60%), positive result(s) in the parent sample will subsequently have a higher than typical estimated uncertainty (MU estimates supplied on request) and in these circumstances the sample result is likely biased significantly low.

Measurement Uncertainty estimates are available for most tests upon request.

Analysis of aqueous samples typically involves the extraction/digestion and/or analysis of the liquid phase only (i.e. NOT any settled sediment phase but inclusive of suspended particles if present), unless stipulated on the Envirolab COC and/or by correspondence. Notable exceptions include certain Physical Tests (pH/EC/BOD/COD/Apparent Colour etc.), Solids testing, total recoverable metals and PFAS where solids are included by default.

Samples for Microbiological analysis (not Amoeba forms) received outside of the 2-8°C temperature range do not meet the ideal cooling conditions as stated in AS2031-2012.



1 May 2023

Sale & Supply of Recycled Products

Compliance to EPA Recovery Order of the Protection of the Environment Operations (Waste) Regulation 2014

Recovered Aggregates Order Exemption

Crystal Pools

Attention: **Rory Oreb**

We confirm that Concrete Recyclers products are manufactured from construction and demolition waste materials such as concrete and brick.

The Environmental Protection Authority (EPA) requires suppliers of recovered aggregates to meet conditions imposed by the EPA to which this Exemption applies, being "The Recovered Aggregates Exemption 2014".

The requirements are:

- The processor must implement procedures to minimize the potential to receive or process waste containing asbestos, and;
- The processor must sample and test recycled products in accordance with column 2 and 3, Table 1, of the exemption document.
<http://www.epa.nsw.gov.au/resources/waste/rre14-aggregate.pdf>
- A copy of the Recovered Aggregates Order is found at:
<http://www.epa.nsw.gov.au/resources/waste/rro14-aggregate.pdf>

Concrete Recyclers have in place very strict inspection and receiving procedure for incoming materials and our products are fully compliant with the Recovered Aggregates Exemption 2014.

The Exemption testing report is also included. Should you require further details please contact the undersigned on 02 8832 7400.

Yours faithfully,

Scott Lawson
Sales Manager

CONCRETE RECYCLERS (GROUP) PTY LTD

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