



6 March 2025

**Gabriel Peters Shaw**

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Submission via DPHI's Major Projects' Portal

Dear Gabriel.

**Re: Environment Representative (ER) Monthly Report for February 2025**  
**Project: SSD-17647189 – Access Logistics Park, 884-928 Mamre Rd, Kemps Creek**

Condition A36(l) of the Conditions of Approval for the Project requires the ER to:

*...prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, and **Environmental Representative Monthly Report** providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports." ....*

The attached report (Attachment 1) details the activities undertaken by the ER for the nominated month. The report is structured to meet the requirements of the *Environment Representative Protocol*, October 2018.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Ben Bracken", written over a light blue circular stamp.

**Ben Bracken**

Environment Representative  
Access Logistics Park  
BBEnviro Pty Ltd

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**Attachments:**

Attachment 1: Environment Representative (ER) Monthly Report for February 2025  
SSD-17647189 – Access Logistics Park, 884-928 Mamre Rd, Kemps Creek

## Environmental Representative Monthly Report for February 2025 (ERMR\_12)

### Project SSD-17647189 – Access Logistics Park, 884-928 Mamre Rd, Kemps Creek

Ref.	ER Protocol Requirement	ER Response
01	Construction activities carried out during the reporting period	<p>Site activities undertaken during the reporting period included the following:</p> <ul style="list-style-type: none"> <li>• Ongoing topsoil stripping and processing</li> <li>• Removal of processed topsoil from site under a Section 143 Notice</li> <li>• Cut and fill earthworks within Lot 2</li> <li>• Establishment of new site compound and site office located on the norther side of the site, with access off Berriwerri Drive</li> <li>• Commencement of piling works for retaining wall 2B along the northern boundary</li> <li>• Preparation works for retaining wall 2A</li> <li>• Importation of sandstone material for retaining wall 2A</li> </ul>
02	Proposed upcoming construction works (where known)	<p>Anticipated construction works for March 2025 include the following:</p> <ul style="list-style-type: none"> <li>• Continued cut and fill earthworks within Lot 2</li> <li>• Commencement of fill import within Lot 2</li> <li>• Dewatering of Dam C located along the northern boundary of the site at the eastern end</li> <li>• Continuation of retaining wall 2B works</li> <li>• Commencement of retaining wall 2A works</li> <li>• Commencement of retaining wall 5 works</li> <li>• Commencement of Stormwater Works surrounding Lot 2</li> </ul> <p>Note: The above list of activities is indicative only and has the potential to change based on several factors including weather, site progress etc.</p>
03	ER site inspections and audits undertaken during the reporting period	<p>Four (4) ER site inspections were undertaken during the reporting period. A summary of each of the site inspections is provided below:</p> <ul style="list-style-type: none"> <li>• Friday 07/02/2025: Active site works at the time of the inspection included cut/fill activities primarily associated with the topsoil processing and the completion of the backfilling works associated with Dam A which is expected to be completed over the coming days.</li> </ul> <p>Dust management and the implementation of effective mitigation measures and controls remain a key focus for the project. A real-time air quality monitoring network has been established and is now operational, commissioned 28/01/2025.</p> <p>A non-compliance was identified in relation to access to information as required under SSD-17647189 Condition C17, with the Project failing to make the required documentation publicly available on their website.</p> <p>In addition, a single improvement opportunity was been raised in relation to the effectiveness of the polymer dosing rate / concentration of the HES Basin. Refer to the report below for further details.</p> <ul style="list-style-type: none"> <li>• Friday 14/02/2025: Dust management controls continue to be implemented, including the use of a dedicated water cart for the topsoil processing area, management of topsoil conveyor drop-height and screening (shade cloth)</li> </ul>

Ref.	ER Protocol Requirement	ER Response
		<p>along the northern boundary in the vicinity of the topsoil processing.</p> <p>Following the on-site ER inspection, a follow-up inspection was undertaken with the Mirvac environmental representative on the adjacent site. The purpose of the inspection was to review project interface locations and key environmental risks, including sediment tracking and surface water discharge. Additional controls to be considered by Burtons including additional site access stabilisation measures.</p> <p>There were no actions / findings resulting from the site inspection.</p> <ul style="list-style-type: none"> <li>Wednesday 19/02/2025: Active site works at the time of the inspection included cut / fill activities primarily along the western boundary of the site in preparation for long-term onsite detention basin. Topsoil processing continues to be undertaken at two locations, with dust being managed well.</li> </ul> <p>Dust management and sediment tracking onto the local road network remain a key focus of environmental management, with the implementation of several new controls over the past week. Minor localised dust was observed at the time of the inspection, however overall, dust management measures appeared to be working effectively, with no visible off-site impacts.</p> <p>There were no actions / findings resulting from the site inspection.</p> <ul style="list-style-type: none"> <li>Friday 28/02/2025: Active site works at the time of the inspection included excavation activities associated with the on-site detention basin along the western boundary, topsoil processing and piling works along the northern boundary.</li> </ul> <p>Two corrective actions were raised as a result of the inspection. One for the management of a minor hydraulic oil spill on the piling pad along the northern boundary and a second for the management of the Sticky Nightshade weed at two locations on site.</p> <p>In addition, an improvement opportunity was raised for the management of localised dust at the site entrance.</p> <p><i>Improvement opportunities are tracked within the ER inspection reports and are closed out when they have been deemed by the ER to have been satisfactorily addressed.</i></p>
04	Community consultation by ER	Nil
05	Complaints received by project	<p>A single complaint was received by the Project on 11/02/2025 during a rainfall event in relation to uncontrolled turbid water leaving the site from the Berriwerri Drive northern access point.</p> <p>In response to the complaint, Burtons engaged their CPESC to undertake a post rainfall review, including a review of the implementation of the ERSED controls in light of the level of rainfall received.</p> <p>The CPESC post rainfall review concluded the rainfall received (and time of concentration flow) would have exceeded the design criteria and the observed discharge from the site was likely the result of overtopping of the Type D basin adjacent to the site access point. Additional controls measures were also recommended to manage erosion and sedimentation during future rainfall events.</p>
06	Environmental performance including	<p><b><u>Environmental incidents</u></b></p> <p>There were no environmental incidents raised during the reporting period.</p>

Ref.	ER Protocol Requirement	ER Response
	any incidents or non-compliances	<p><b><u>Environmental performance</u></b></p> <p>A single non-compliance (NC-250207-01) as raised following the ER inspection on 07/02/2025 in relation to required information not being made publicly available on the project website as required under Condition C17 of the project approval (SSD-17647189). At the time of preparing this ER monthly report, the ER was aware of substantial progress in relation to this matter, with a draft website complete – awaiting publication. It is expected the issue will be rectified in the coming weeks.</p>
07	Analysis of lessons learnt and opportunities identified for improvement	<p>Two (2) corrective actions and two (2) improvement opportunities were raised during the reporting period. Summary as follows:</p> <ul style="list-style-type: none"> <li>• Corrective Action CA-250228-01: Remove contaminated material from the piling platform and dispose of appropriately. Provide refresher training to site personnel on the need to manage spills on site, including deployment of spill response material and report as an incident to Supervisor.</li> <li>• Corrective Action CA-250228-02: Physically remove the isolated patches of Sticky Nightshade weed prior to topsoil stripping and dispose of as general waste (not green waste). Weeds in other areas not being stripped can be managed by either physical removal or herbicide application.</li> <li>• Improvement Opportunity IO-250207-01: Update to be provided by Burtons with regards to testing of polymer dosing and effectiveness of polymer concentrations.</li> <li>• Improvement Opportunity IO-250228-01: During extended periods of dry weather, ensure that the waters carts are tasked to apply water to the access road as required to prevent generation of nuisance dust.</li> </ul> <p>The above corrective actions and improvement opportunities remained open at the time of preparing this ER Monthly Report. Close-out details to be provided in the March 2025 ER Monthly Report.</p>
08	Any changes to the project, including plans and approvals	Nil
09	Meetings attended by ER	<ul style="list-style-type: none"> <li>• Mamre Road Precinct Working Group Meeting, Thursday 27/02/2025</li> </ul>
10	Documents received by ER for review	<p>Details of documents received during the reporting period as follows:</p> <ul style="list-style-type: none"> <li>• Mamre Road Precinct Working Group meeting minutes for January 2025 issued for review. Received from SLR via email dated 05/02/2025</li> <li>• Various correspondence via email received by ER from Mirvac and Burton Contractors with regards to dust management / mitigation. Initial email issued by Burton Contractors advising of mitigation measures and controls, dated 05/02/2025. Various follow-up emails provided by both parties between 05/2025 and 11/05/2025.</li> <li>• Email received from Mirvac's Environmental Advisor with regards to an issue relating to the uncontrolled release of sediment laden water from the Barings Site following a rainfall event. Email received 12/02/2025. This information was provided to Burton Contractors for inclusion in the complaints register and action as required. Refer to Section 05 above for further details.</li> <li>• Meeting minutes received from Mirvac's Environmental Advisor following an off-site meeting held on 14/02/2025 between Mirvac, Burton Contractors and Barings to review site interface risks and to discuss mitigation measures and controls. Minutes received via email on 15/02/2025.</li> </ul>

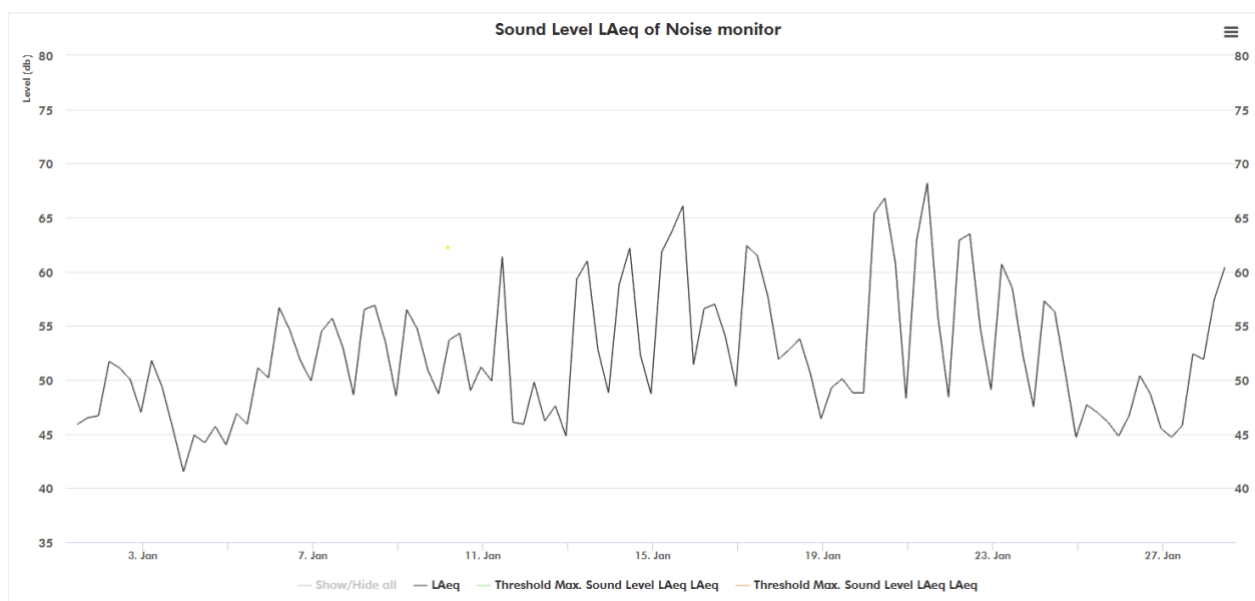
Ref.	ER Protocol Requirement	ER Response
		<ul style="list-style-type: none"> <li>A copy of the final Mamre Road Precinct Working Group meeting minutes for December 2024 and January 2025 received from SLR via email dated 24/02/2025.</li> </ul>
11	Documents issued by ER*	<p>Details of documents issued by ER during the reporting period as follows:</p> <ul style="list-style-type: none"> <li>Provision of ER monthly report for January 2025 and request for Barings to upload to the DPHI Major Projects Portal. Issued via email dated 07/02/2025.</li> <li>Provision of ER monthly report for January 2025 to DPHI (Gabriel Peters Shaw) via email dated 07/02/2025. Provided for information.</li> <li>ER inspection report issued via email on 10/02/2025 for an inspection completed on 07/02/2025.</li> <li>Email correspondence dated 10/02/2025 issued from ER to DPHI regarding identification of non-compliance in relation to Condition C17 (Access to information).</li> <li>ER inspection report x 2 issued via email on 27/02/2025 inspections completed on 14/02/2025 and 19/02/2025.</li> <li>ER inspection report issued via email on 28/02/2025 for an inspection completed earlier on the same day (28/02/2025).</li> </ul>

*\*Including any advice or requests, corrective action requests or non-compliance reports, out of hour work approval(s) or other, such as certifications and minor ancillary facility approvals*

## 12 Review of monitoring results by ER

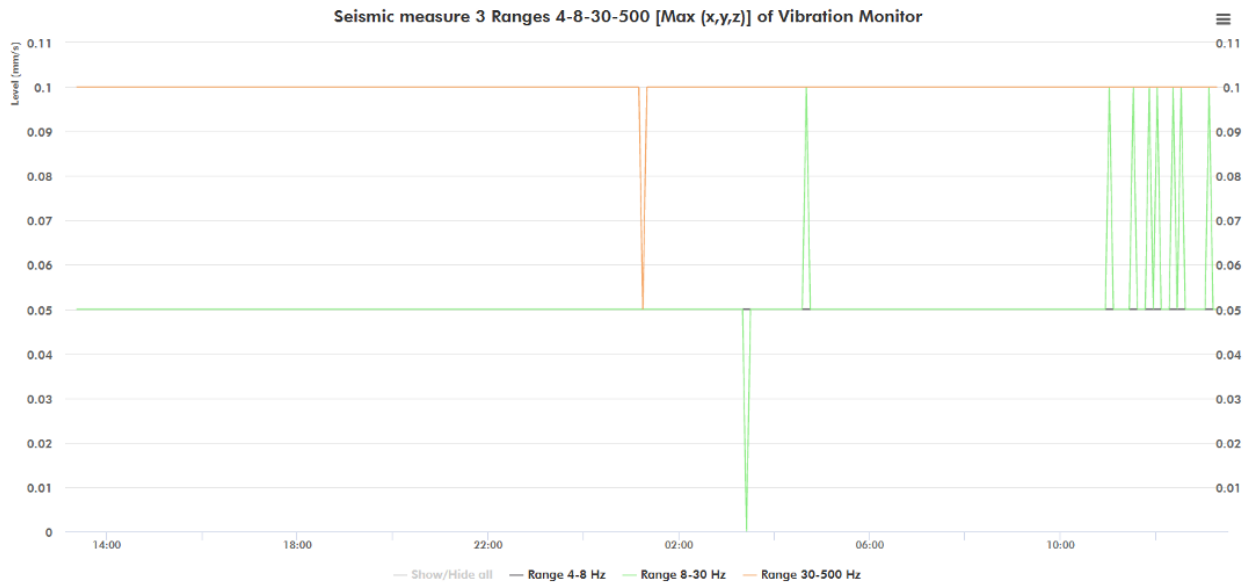
**Realtime noise monitoring results:** Noise levels measured during the reporting period are presented in the graph below, taken from a location on the southern site boundary nearest to the sensitive receiver (930 Mamre Road).

Results indicate noise levels consistent with those predicted in the Construction Noise and Vibration Management Plan (CNVMP) for both the demolition modelled scenario and the bulk earthworks modelled scenario (refer to Table 17 of the CNVMP). The maximum noise level (LAeq) recorded was 74dBA during earthworks at the beginning of the reporting period, and 82dBA at the end of the reporting period during demolition works. These results are compared to a predicted noise level (with no mitigation measures implemented – i.e. noise barrier) of 74 dBA for earthworks and 82 dBA for demolition works. A summary of the real-time noise level data is presented in the screenshot below.



**Vibration monitoring results:** Realtime vibration monitoring results for the reporting period are presented in the graph below.

Vibration levels measured at the site boundary of the nearest sensitive receiver (930 Mamre Road) indicate levels well below the vibration thresholds as detailed in the CNVMP (15mm/s at 4Hz, 20mm/s at 15 Hz and 50mm/s at 40 Hz and above).



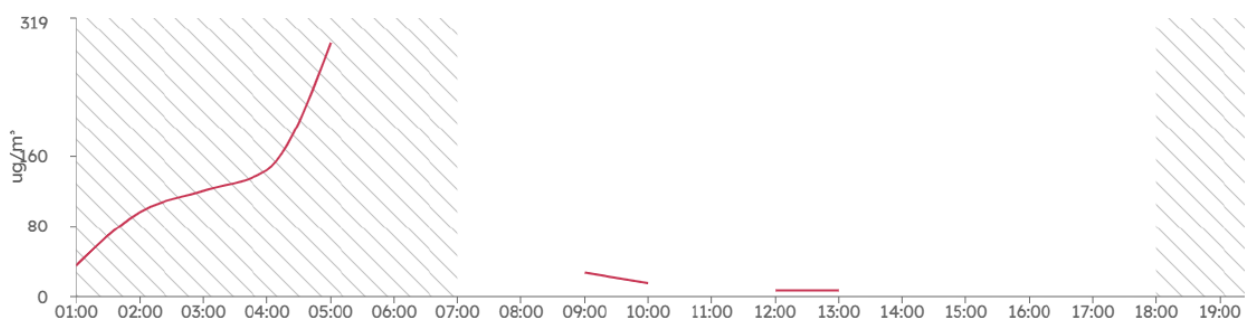
**Real-time air quality monitoring:** Real-time air quality network utilising SiteHive instrumentation has been operational since 28/01/2025.

Available real-time air quality monitoring results for the month of February 2025 are shown below, showing three (3) events where the daily annual average PM10 criteria of 50 $\mu\text{g}/\text{m}^3$  was exceeded.

With regards to the exceedances, Burtons advised the following:

- 07/02/2025 (South): Minor exceedances attributed to high humidity levels overnight and at the start at the day, during times of no site activity. A copy of the real-time PM10 graph was sighted for the 24-hour period which correlates with Burton's advice.
- 07/02/2025 (East): Minor exceedances attributed to high humidity levels overnight and at the start at the day, during times of no site activity. A copy of the real-time PM10 graph was sighted for the 24-hour period which correlates with Burton's advice.
- 12/02/2025 (East): Exceedance attributed to a fault with the monitor during this period resulting only partial readings throughout the 24 period, distorting / misrepresenting the 24-hour average. A copy of the real-time PM10 graph was sighted for the 24-hour period which correlates with Burton's advice. See screen shot below.

#### Particulate Matter Mass Concentrations | PM10



$\mu\text{g}/\text{m}^3$	▼ South		▼ North		▼ West		▼ East	
Daily Averages	PM2.5	PM10	PM2.5	PM10	PM2.5	PM10	PM2.5	PM10
01 Feb 2025	7	18	7	18	7	21	9	22
02 Feb 2025	5	18	5	14	5	18	7	22
03 Feb 2025	7	36	6	39	7	45	6	25
04 Feb 2025	8	41	7	42	9	50	10	41
05 Feb 2025	9	33	9	38	10	39	11	41
06 Feb 2025	10	26	13	51	11	45	12	34
07 Feb 2025	11	55	6	30	9	47	14	59
08 Feb 2025	6	20	5	16	7	26	6	25
09 Feb 2025	5	12	4	10	5	15	6	20
10 Feb 2025	4	15	4	13	7	22	6	24
11 Feb 2025	4	18	5	15	4	19	5	27
12 Feb 2025	6	28	5	25	5	25	15	70
13 Feb 2025	8	24	7	27	10	28	8	26
14 Feb 2025	10	31	9	29	11	37	10	35
15 Feb 2025	4	13	3	10	4	15	4	16
16 Feb 2025	4	14	3	11	4	14	5	17
17 Feb 2025	4	18	7	48	4	21	5	24
18 Feb 2025	7	35	6	42	7	34	6	27
19 Feb 2025	8	43	7	37	7	46	6	36
20 Feb 2025	7	18	9	31	8	30	8	23
21 Feb 2025	6	22	13	47	4	20	8	26
22 Feb 2025	5	14	4	12	1	1	6	16
23 Feb 2025	8	29	4	15	0	1	11	41
24 Feb 2025	10	27	10	39	1	6	11	35
25 Feb 2025	10	31	9	33	1	1	12	34
26 Feb 2025	7	37	6	25	2	4	9	40
27 Feb 2025	7	29	6	29	2	5	7	29
28 Feb 2025	7	37	6	37	1	1	8	43
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**Dust deposition gauges:** Dust deposition results for the month of January 2025 and February 2025 were received during the reporting period, noting a lag in reporting due to laboratory analysis and report turn-around times.

The lab analysis reports include results for four (4) dust deposition gauges established on the site boundary of the active works.

A summary of the dust depositional results for the period of 18/12/2024 – 17/01/2025 (January 2025) and 17/01/2025 – 14/02/2025 (February 2025) is shown in the table below.

**Note:** Elevated dust deposition rates were reported for Monitoring Location 02 (North) during the January 2025 reporting period. Burton Constructions advised that during the monitoring period, site works were minimal with civil and topsoil processing works shutdown over the Christmas period and not recommencing until 13/01/2025 due to rainfall delays.

Dust complaints were received from the adjoining premises to the north of the site during late January 2025. Reported dust deposition rates for the period of 17/01/2025 – 14/02/2025 for the North monitoring location are within normal range.

Ref.	ER Protocol Requirement	ER Response
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#### Dust Depositional Gauge Results

Sample ID	01 (South)	02 (North)	03 (East)	04 (West)
Total insoluble matter (gm/m <sup>2</sup> /month)* - February 2025	1.6	2.4	2.2	2.4
Total insoluble matter (gm/m <sup>2</sup> /month)* - January 2025	1.1	13.2	2.4	0.9
Total insoluble matter (gm/m <sup>2</sup> /month)* - December 2024	0.6	1.1	3.3	5.1
Total insoluble matter (gm/m <sup>2</sup> /month)* - November 2024	1.9	1.0	Nil**	4.1
Rolling 12-month average***	1.3	4.4	2.6	3.1

\*Criteria is an annual average of 4gm/m<sup>2</sup>/month, and no increase greater than 2 gm/m<sup>2</sup>/month on the previous month rolling annual average. These targets are based on the NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (2022).




\*\*No active works near the eastern boundary. Interim dust depositional gauge located immediately adjacent to internal haul-road and not representative of boundary insoluble solid deposits.

\*\*\*Based on average of sampling events completed to date, not a 12-month average.

13	Closing remarks	No further comment.
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14	Photos	Ref	Description
	<b>Photo 01</b> 07/02/2025	<b>Dust management</b>  Backfilling works associated with Dam A was almost complete at the time of the inspection.  The dam had been backfilled and compacted in layers, with only a small strip along the southern edge of the former dam wall remaining,  A water cart was observed at all times applying water at suitable quantities / rates to ensure dust generation was being mitigated, whilst not saturating the ground, making the material unworkable.	
	<b>Photo 02</b> 07/02/2025	<b>Dust management</b>  The internal access road along the northern boundary was monitored closely during the ER site inspection, with no dust generation	
	<b>Photo 03</b> 07/02/2025	<b>Real-time air quality monitoring</b>  A network of four (4) real-time air quality monitoring station was established and commissioned on site on 28/01/2025.  The air quality monitoring stations have been established in accordance with the approved Air Quality Management Plan (AQMP), including a monitor station on each of the four (4) boundaries.	

14	Photos	Ref	Description
	<b>Photo 04</b> 14/02/2025	<b>Topsoil processing</b> <p>Burtions' sub-contractor continues to process topsoil using a trommel screen and load-out conveyors.</p> <p>Environmental controls remain in place including:</p> <ul style="list-style-type: none"><li>• A dedicated water cart specifically for the topsoil processing area</li><li>• Fixed water sprays on the arms of the load-out conveyors</li><li>• Shade-cloth screening along the northern boundary</li><li>• Ongoing use of real-time air quality monitoring around the site perimeter.</li></ul>	
		<b>Photo 05</b> 14/02/2025	<b>High efficiency sediment basin</b> <p>Despite the recent rainfall event, the HES Basin water level still remains very low, noting that Burtions advised they treated and emptied the basin just prior to the rainfall event.</p> <p>The water quality still appears to contain a high sediment load, although Burtions advised they have recently been pumping direct to the large basin, bypassing the forebay / treatment zone, given the poor treatment results achieved to date using this method. Water treatment using a spray polymer is to be applied prior to discharge, ensuring discharge water quality is achieved.</p>
			<b>Photo 06</b> 19/02/2025



14	Photos	Ref	Description
	<b>Photo 07</b> 19/02/2025	<b>Site access controls</b> <p>A chip-sealed surface has been applied to the site access road off Berriwerri Drive.</p> <p>A rumble grid also remains in place in an effort to manage sediment tracking onto the local road networks.</p> <p>In the event that sediment is tracked for wheels of departing vehicles, Burtons have a fulltime streetsweeper operational on the site.</p>	
		<b>Photo 08</b> 28/02/2025	<b>Spill management</b> <p>During the site inspection, an area of fresh oil (presumably hydraulic oil) was observed on the surface of the piling platform / access road. For this observation, a corrective action was raised, requesting the contaminated material be removed / disposed and refresher training provided to site personnel with regards to spill response and incident reporting.</p>
		<b>Photo 09</b> 28/02/2025	<b>Piling works</b> <p>A piling platform has been constructed along the northern boundary of the site.</p> <p>Piling has commenced for the installation of 600mm diameter piles to with average depths of between 7m-10m and a maximum depth of 15m below the ground surface.</p> <p>The issue of concrete truck wash-out was discussed with Burtons who advised they have established a single concrete washout point at present with a second to be constructed over the coming weeks.</p>