

6 June 2025

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**Gabriel Peters Shaw** 

Senior Compliance Officer
Planning and Assessment
Department of Planning, Housing and Infrastructure
Locked Bag 50122
Parramatta NSW 2124

Submission via DPHI's Major Projects' Portal

Dear Gabriel.

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

Condition A36(I) 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,

Ben Bracken

Environment Representative Access Logistics Park BBEnviro Pty Ltd

Phone: 0410 409 897

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#### Attachments:

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



# Environmental Representative Monthly Report for May 2025 (ERMR\_15) 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	Site activities undertaken during the reporting period included the following:				
		Ongoing earthworks within Lot 2				
		<ul> <li>Continued excavation for retaining wall 5 (located adjacent to the bioretention basin, in Lot 1)</li> </ul>				
		Continued steel fixing for retaining wall 5				
		Pouring of retaining wall 5 base slabs and Dincel walls				
		<ul> <li>Continuation of shotcrete works for retaining wall 2B (concrete piled wall along the northern boundary of Lot 2)</li> </ul>				
		Environmental works due to rainfall				
02	Proposed upcoming construction works (where known)	Anticipated construction works for June 2025 include the following:				
		Completion of earthworks for Lot 2 (delayed due to rainfall)				
		<ul> <li>Completion of shotcrete works for retaining wall 2B (concrete piled wall along the northern boundary of Lot 2)</li> </ul>				
		<ul> <li>Completion of Dincel retaining wall 5A (located adjacent to the bioretention basin, in Lot 1)</li> </ul>				
		Construction of Dincel retaining walls 5B-5F				
		Commencement of Stormwater Works surrounding Lot 2				
		Note: The above list of activities is indicative only and has the potential to change based on several factors including weather, site progress etc.				
03	ER site inspections and audits undertaken during the reporting period	Two (2) ER site inspections were undertaken during the reporting period. A summary of each of the site inspections is provided below:				
		<ul> <li>Tuesday 13/05/2025: The site remains relatively wet due to recent rainfall, restricting certain civil activities on site. The site inspection included review of the HES Basin and erosion / sedimentation controls along the western boundary, in addition to the progress of retaining wall construction along the northern boundary (retaining wall 2B).</li> </ul>				
		Sediment tracking continues to be managed along the adjoining estate road, Berriwerri Drive, with the implementation of internal site controls and an operational streetsweeper.				
		A single improvement opportunity was raised in relation to the reinstatement of erosion and sedimentation controls along the western boundary of site, following the completion of the installation of electrical conduits by an external contractor for a separate project.				
		<ul> <li>Monday 21/05/2025: The site was heavily impacted following the major rainfall event which occurred over a three (3) day period between Wednesday 21/05/2025 and Friday 23/05/2025 inclusive, with reported rainfall totals of more than 130mm during this period.</li> </ul>				
		The rainfall event caused sediment basin volumes to exceed design capacity, and in the case of the Lot 7 sediment basin, the western wall experienced partial failure, resulting in the uncontrolled release of sediment and sediment laden water. Concentrated surface water flows from Lot 2 caused inflow of sediments into the main bay of the HES Basin. The rainfall event and site impacts were reported to the Department via email on the day of occurrence (Friday 23/05/2025). Burton				

# Ref. ER Protocol Requirement

#### ER Response

Contractors in consultation with Barings were quick to respond and implement immediate rectification measures where possible – weather and ground conditions permitting.

Four (4) corrective actions were raised resulting from the inspection in relation to further rectification measures (sediment removal and review of upstream surface flows from the HES Basin), review of sediment basin integrity and management of water build up within the bund of the generator for the main site office.

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.

04 Community consultation by ER

Nil

05 Complaints received by project

Barings advised Burton Contractors on 22/05/2025 that a complaint was received from a Mamre Road resident in relation to water flow through the property.

06 Environmental performance including any incidents or non-compliances

#### **Environmental incidents**

There were no environmental incidents raised during the reporting period.

As noted in the ER site inspection report for 21/05/2025, approximately 130mm of rainfall was received over a three (3) day period between Wednesday 21/05/2025 and Friday 23/05/2025 inclusive. The rainfall event caused sediment basin volumes to exceed design capacity, and in the case of the Lot 7 sediment basin, the western wall experienced partial failure, resulting in the uncontrolled release of sediment and sediment laden water. Concentrated surface water flows from Lot 2 caused inflow of sediments into the main bay of the HES Basin. The rainfall event and site impacts were reported to the Department via email on the day of occurrence (Friday 23/05/2025).

#### **Environmental performance**

There were no environmental performance issues were raised / identified during the reporting period.

# 07 Analysis of lessons learnt and opportunities identified for improvement

## **Corrective Actions raised by the ER:**

There were a total of four (4) corrective actions raised by the ER during the reporting period. Details of the corrective actions and status update are provided below:

 Corrective Action CA-250526-01: Review the condition of the Lot 7 sediment basin wall, particularly along the western edge and ensure the wall dimensions / construction is sufficient to prevent further failure in during another rainfall event.

Email update provided by Burton Contractors on 05/06/2025: The sediment basin breach point has been reinforced with fill and sandbags. The water has been treated to reduce sediment load. Water to be pumped out when suitable water quality is achieved.

Corrective Action CA-250526-02: The CPESC is to review the up-gradient flow paths
and environmental controls to prevent / minimise concentrated water flows impacted
the basin during future heavy rainfall events. The sediment basin is to be reinstated
as per design (i.e. reinstate geofabric) including removal of sediment build-up and
reinstatement of geofabric.

Email update provided by Burton Contractors on 05/06/2025: The water within the HES basin has been treated (to reduce sediment load), tested and dewatered, to allow access for remediation. Remediation of the failed batter is scheduled to take place during the week commencing Monday 09/06/2025.

 Corrective Action CA-250526-03: When ground conditions are suitable, remove the sediment build-up within the southwestern corner of the site to prevent the potential

Ref.	ER Protocol
	Requirement

#### ER Response

for further migration off site.

Email update provided by Burton Contractors on 05/06/2025: The subject area remains too saturated for safe excavator access. Geofabric has been replaced, and the area will continue to be monitored for access suitability.

 Corrective Action CA-250526-04: Remove any hydrocarbons from the surface of the water in the generator bund adjacent to the main office and remove clean water to restore bund capacity.

Email update provided by Burton Contractors on 05/06/2025: The majority of the hydrocarbons and water has been removed. Bund capacity has been restored to approximately 80%.

The above corrective actions and rectification where applicable, will be reviewed during the next ER inspection scheduled to be undertaken during the week commencing Monday 09/06/2025.

#### Improvement Opportunities raised by the ER:

There were no improvement opportunities raised by the ER during the reporting period.

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.

08 Any changes to the project, including plans and approvals Nil

09 Meetings attended by ER

Mamre Road Precinct Working Group Meeting, Wednesday 14/05/2025

10 Documents received by ER for review

Details of documents received during the reporting period as follows:

- Barker Ryan Stewart (BRS) site inspection report received via email on 01/05/2025.
   The site inspection was undertaken on 17/04/2025 targeting review of the implementation of erosion and sedimentation controls as per the approved ESCP.
- Monthly Erosion and Sediment Inspection Report prepared by the Project CPESC for an inspection undertaken on 29/04/2025 was provided by email on 05/05/2025. No issues identified.
- Dust deposition results for the April reporting period provided via on 06/05/2025 for inclusion / consideration in the monthly ER Report for April 2025.
- Revised Erosion and Sedimentation Control plan received via email link on 09/05/2025. Document details: State Significant Development Application – \_Access Logistics Park, 884-928 Mamre Road, Kemps Creek, NSW, 2178: Erosion and Sedimentation Package – \_State Significant Development Application SSD-17647189, Revision G dated 28/01/2025.
- Email notification received from Burton Contractor's on Monday 26/05/2025 advising
  of the recent rainfall event (131mm of rainfall) and the condition of site and
  environment controls, including breach of the HES Basin.
- Email advice received from the Project CPESC on Monday 26/05/2025 with regards
  to sediment basin operations and expectations following heavy rainfall events.
   CPESC advised they would be undertaking a site inspection by the end of the week
  (by 30/05/2025).
- Copy of email correspondence issued by Barings to the Department provided by email on 26/05/2025. Email correspondence was in relation to site conditions following the heavy rain event, including a summary of environmental controls and

# Ref. ER Protocol Requirement

#### ER Response

rectification measures implemented since the rainfall. Photos of site conditions also provided.

- Email advice received from Barings on Thursday 29/05/2025 regarding the pending controlled discharge from the HES Basin following water quality treatment and testing to confirm water quality is compliant with discharge requirements. Water discharge was being undertaken in consultation with the Project CPESC. DPHI representatives included on email distribution list.
- Reply email received from DPHI's Gabriel Peters Shaw on 29/05/2025, advising should any complaints be received in relation to the HES Basin discharge, the complainant will be encouraged to contact the project directly.

# 11 Documents issued by ER\*

Details of documents issued by ER during the reporting period as follows:

- ER inspection report issued via email on 05/05/2025 for an inspection completed on 29/04/2025.
- Provision of ER monthly report for April 2025 and request for Barings to upload to the DPHI Major Projects Portal. Issued via email dated 06/05/2025.
- ER Review letter provided via email on 12/05/2025 following review of the revised Erosion and Sediment Control Plan Document details: State Significant Development Application \_Access Logistics Park, 884-928 Mamre Road, Kemps Creek, NSW, 2178: Erosion and Sedimentation Package \_State Significant Development Application SSD-17647189, Revision G dated 28/01/2025.
- ER inspection report issued via email on 20/05/2025 for an inspection completed on 13/05/2025.
- ER inspection report issued via email on 26/05/2025 for an inspection completed earlier on the same day, 26/05/2025.

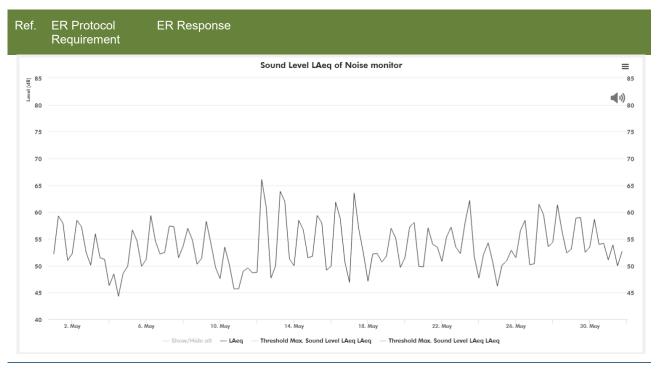
\*Including any advice or requests, corrective action requests or non-compliance reports, out of hour work approval(s) or other, such as certifications and minor ancillary facility approvals

## 12 Review of monitoring results by ER

<u>Realtime noise monitoring results:</u> 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).

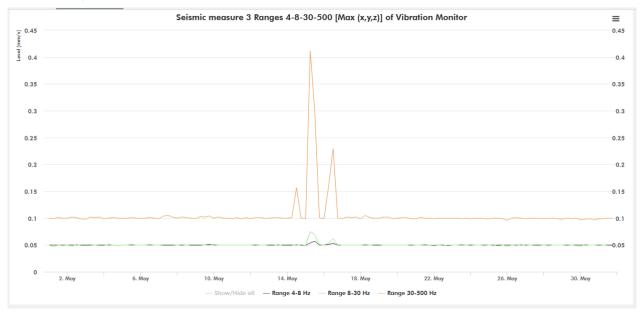
Results indicate noise levels consistent with those predicted in the Construction Noise and Vibration Management Plan (CNVMP) for both the bulk earthworks modelled scenario (refer to Table 17 of the CNVMP). The maximum noise level (LAeq) recorded was 66dBA during earthworks compared to a predicted noise level (with no mitigation measures implemented – i.e. noise barrier) of 74 dBA.

A summary of the real-time noise level data is presented in the screenshot below.



<u>Vibration monitoring results:</u> Realtime vibration monitoring results for the reporting period are presented in the screenshot 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.

Burton Contractors advised that the Northern SiteHive monitor was damaged during the rainfall event. The monitor stopped working on 22/05/2025 and remained offline for the remainder of the month, noting that at the time of preparing this monthly ER report, the monitor has been replaced and is once again operational.

Available real-time air quality monitoring results for the month of May 2025 are shown below, showing exceedances of the daily annual average PM10 criteria of 50ug/m³ highlighted in yellow, with exceedance events recorded on a total of four (4) days during the reporting period. With regards to the exceedance events, Burton Contractors has advised the following:

• Eastern, Western and Southern monitoring locations for 06/05/2025: Minor exceedances attributed to high humidity levels overnight and at the start at the day, during times of low site activity. A copy of the real-time

#### Ref. ER Protocol Requirement

ER Response

PM10 graph and Humidity/Temp/Dew Point graph was sighted for the 24-hour period which correlates with Burton's advice.

- Eastern and Southern monitoring location for 13/05/2025: Minor exceedances attributed to high humidity levels overnight and at the start at the day, during times of low site activity. A copy of the real-time PM10 graph and Humidity/Temp/Dew Point graph was sighted for the 24-hour period which correlates with Burton's advice.
- Northern, Eastern, Southern and Western monitoring locations for 14/05/2025: Minor exceedances attributed to
  high humidity levels overnight and at the start at the day, during times of low site activity. A copy of the real-time
  PM10 graph and Humidity/Temp/Dew Point graph was sighted for the 24-hour period which correlates with
  Burton's advice.
- Northern, Eastern, Southern and Western monitoring locations for 17/05/2025: Minor exceedances attributed to
  high humidity levels overnight and at the start at the day, during times of low site activity. A copy of the real-time
  PM10 graph and Humidity/Temp/Dew Point graph was sighted for the 24-hour period which correlates with
  Burton's advice.

Refer to the ER Monthly Report for March 2025 for further details regarding the impact / interference of high humidity on PM10 results.

<u>Dust deposition gauges:</u> Dust deposition results for the period extending from month of May 2025 (14/04/2025 – 15/05/2025) 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 three (3) dust deposition gauges established on the site boundary of the active works.

Burton Contractors advised that the dust deposition gauge at the Western monitoring location (Location No. 4) was damaged by works associated with an adjoining project – the damage was caused by an external contractor. The gauge has since been replaced.

A summary of the dust depositional results for the period of 14/04/2025 - 15/05/2025 (May 2025) is shown in the table below.

#### **Dust Depositional Gauge Results**

Sample ID	01 (South)	02 (North)	03 (East)	04 (West)	
Total insoluble matter (gm/m²/month)* - May 2025	0.3	2.1	0.7	Damaged dust gauge (No results)	
Total insoluble matter (gm/m²/month)* - April 2025	0.7	0.2	0.2	<0.1	
Total insoluble matter (gm/m²/month)* - March 2025	0.9	2.4	0.8	2.7	
Total insoluble matter (gm/m²/month)* - February 2025	1.6	2.4	2.2	2.4	
Total insoluble matter (gm/m²/month)* - January 2025	1.1	13.2	2.4	0.9	
Total insoluble matter (gm/m²/month)* - December 2024	0.6	1.1	3.3	5.1	
Total insoluble matter (gm/m²/month)* - November 2024	1.9	1.0	Nil**	4.1	
Rolling 12-month average***	1.0	3.2	1.6	2.6	

<sup>\*</sup>Criteria is an annual average of 4 gm/m²/month, and no increase greater than 2 gm/m²/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).

<sup>\*\*</sup>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.

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

							I	
μg/m <sup>3</sup>	South		▼ North		West		<b>V</b> East	
Daily Averages		<b>₩ PM10</b>	∰ PM2.5		∰ PM2.5	<b>₩ PM10</b>	∰ PM2.5	
01 May 2025	3	9	3	8	4	12	4	9
02 May 2025	4	14	3	14	5	23	5	16
03 May 2025	4	12	3	12	4	16	6	17
04 May 2025	7	27	4	12	5	25	14	40
05 May 2025	8	25	6	40	7	34	10	31
06 May 2025	12	55	6	50	9	72	21	62
07 May 2025	4	18	3	18	6	42	6	24
08 May 2025	5	18	5	23	6	34	6	20
09 May 2025	5	19	4	27	6	33	5	17
10 May 2025	6	21	4	12	5	16	10	26
11 May 2025	11	41	5	19	6	35	14	43
12 May 2025	8	24	6	18	5	20	7	26
13 May 2025	12	<mark>54</mark>	5	32	8	50	20	64
14 May 2025	15	55	8	53	9	61	19	<mark>65</mark>
15 May 2025	8	26	4	15	7	35	8	24
16 May 2025	8	20	4	16	7	27	9	22
17 May 2025	21	61	14	<mark>56</mark>	15	63	21	58
18 May 2025	3	9	3	8	3	11	3	9
19 May 2025	6	14	5	13	6	18	7	16
20 May 2025	7	18	6	18	9	27	7	19
21 May 2025	9	24	8	23	9	30	9	26
22 May 2025	13	31			13	36	15	49
23 May 2025	7	16			8	20	9	24
24 May 2025	2	5			2	8	3	8
25 May 2025	2	9			3	12	5	11
26 May 2025	5	16			5	22	5	20
27 May 2025	10	26			10	36	12	34
28 May 2025	2	8			3	12	4	10
29 May 2025	4	12			4	20	4	9
30 May 2025	9	31			8	31	6	19
31 May 2025	10	27			8	26	7	18

## 13 Closing remarks

As reported in the CPESC Post Rainfall ESCP Review letter dated 30/05/2025, the site experienced a significant rainfall event during the period commencing Friday 16/05/2025 and concluding Sunday 25/05/2025. During this period the site received approximately 129mm of rainfall with over 70mm of this received on the afternoon of Friday 23/05/2025.

Several of the sediment basins on site were compromised as a result of the high rainfall received, resulting in localised impacts including uncontrolled release of sediment laden water and accumulation of down-stream sediments.

Burton Contractors were able to demonstrate a rapid response in their clean-up and response efforts, including the immediate removal of down-gradient sediment accumulation and rectification of damaged sediment basins as required. The review and repair of sediment basins and environmental controls remains ongoing and will continue into the month of June 2025.

# 14 Photos Ref Description



# Photo 01 13/05/2025

## Sediment tracking management

Minor discolouration observed in parts along Berriwerri Drive, with no sign of sediment build-up / tracking observed.

Burton Contractors continue to operate a streetsweeper fulltime.

It is also noted that other sites / activities also utilise Berriwerri Drive with the potential to track sediments.



# Photo 02 13/05/2025

# Retaining wall 2B – Northern Boundary

The final depth of excavation has almost been reached at the western extent of the shotcrete retaining wall (retaining wall 2B) along the northern boundary of the site.

Preparation including steel-fixing and drainage installation has been completed for the next level of shotcreting (2.5m section), which will be followed by a final 1.0m section, aligning the base of the retaining wall with the base level of the bioretention basin.

Dust generation was minimal at the time of the inspection.



## Photo 03

## 26/05/2025

## Sediment tracking management

Burton Contractors advised that during the recent rainfall event (reported approximately 135mm over a three (3) day period from 21/05/2025 – 23/05/2025), the sediment basin located to the east and adjacent to the access point failed along the western side, resulting in uncontrolled release of sediment and sediment-laden water onto the access road and out onto Berriwerri Drive.

Immediate rectification of the issue was undertaken, including temporary repair of the sediment basin wall (western side) and physical removal of the sediment from the access point. This was communicated to the Department by Barings on the afternoon of Friday 23/05/2025 via email.

# 14 Photos Ref Description



# Photo 04 26/05/2025

### Sediment basin management -Lot 7 Sediment Basin – adjacent to site access

Whilst is understood that amount the amount of rainfall received exceeded the design capacity of the sediment basin, the failure of the basin wall compounded the issue and rendered the basin less effective during the rainfall event.

For this issue corrective action CA-250526-01 was raised (refer to Section 7 above for further details).



# Photo 05 26/05/2025

# Sediment basin management – HES Basin

due to the high level of rainfall received, it was observed that concentrated water flow entering the HES basin from the northeastern corner has scoured away the embankment at that location and deposited a large volume of sediment within the basin.

For this observation, corrective action CA-250526-02 was raised (refer to Section 7 above for further details).



# Photo 06 26/05/2025

# Sediment basin management – HES Basin

Following the rainfall event, a large deposit of sediment was observed in the south-western corner of the site. It was noted that whilst sediment was evident beyond the site boundary, the extent of the sediment deposit was considered localised with no evidence of associated sediment further down-gradient form site (i.e. adjacent to Mamre Road).

For this observation, corrective action CA-250526-03 was raised (refer to Section 7 above for further details).